

**Sage Grouse Schedule**

**Due Date**

**Days**

Direction to State Directors	1/23/2015	
Subregions revise Chapter 2 with ADPP	2/27/2015	35
<b>Sub-regions send ADPP data to the NOC, reflecting changes from FFM, discussions with the States, and from interagency leadership briefings</b>	2/20/2015	28
<b>NOC QA/QC and data to FWS</b>	2/27/2015	7
NOC completes WAFWA MZ Tier II CEA MZ tables	3/20/2015	21
EMPSi completes Tier II CEA MZ analysis and sends analysis to sub-regions	4/24/2015	35
Teams begin work on ROD template	4/24/2015	
Conduct Direct and Indirect Impact Analysis	4/3/2015	35
BLM/FS ID-teams review of direct and indirect impact analysis ( <i>for those planning efforts using contractors only</i> )	4/17/2015	14
BLM/FS ID-teams review CEA	5/1/2015	7
EMPSi revises CEA based on ID-teams comments	5/8/2015	7
BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	5/1/2015	14
Consistency Review Strike Team Reviews all 14 Draft FEISs.	5/8/2015	7
BLM/FS ID-teams respond to potential issues from Consistency Review Strike Team.	5/15/2015	7
BLM/Contractors incorporate CEAs and make modifications for WO Review versions of the FEIS.	5/20/2015	5
<b>Submit briefing packet to WO/WO Review Kick-off Briefing</b>	5/20/2015	
WO Review (CONCURRENT COOPERATING AGENCY REVIEW)	6/3/2015	14
BLM Consolidate/filter all WO BLM/FS & SOL/OGC comments	6/5/2015	2
Sub-regions respond to WO review comments	6/12/2015	7
WO resolves any pending concerns that arise out of the WO Review	6/14/2015	2
BLM/Contractors make modifications in Public Review versions of the FEIS.	6/19/2015	5
<del>National Policy Team Briefing</del>		
<del>BLM Director's Briefing</del>		
Interagency Leadership Briefing	6/19/2015	
Secretaries of DOI and USDA Briefing - Approval to Print	6/19/2015	0
BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	6/23/2015	4
Camera-ready copy to GPO/PDF for website	6/23/2015	
CD Distribution	6/30/2015	7
Printing and distribution by GPO	7/7/2015	14
<b>Publish Proposed Plan EISs (falls on a Friday per EPA requirements)</b>	6/26/2015	7
ID Teams begin work on Approved RMPs	6/26/2015	
Protest Period Ends (30 day mandatory protest period)	7/27/2015	31
Protest Resolution Process Ends	8/26/2015	30
Governor's Consistency Review Ends (60 day mandatory governor consistency review)	8/25/2015	60
<del>National Policy Team Briefing</del>		

<del>BLM Director's Briefing</del>		
Interagency Leadership Briefing	8/31/2015	6
Secretaries of DOI and USDA Briefing	9/1/2015	1
<b>RODs are signed</b>	9/2/2015	1
Formal Consultation for Utah, Wyoming and Montana revision	8/30/2015	135

## Notes

FWS wants this before March

6 weeks preferred

based on chapter 2

2 weeks - start compiling document - everything except for the CEA

1 week

1 week

2 weeks

1-2 weeks, with FS?

1 week

2-4 weeks; cooperating agencies get 2 weeks

2 days

1 week

2 days

1 week

Tied to Line 21

Assumes approval to print will be granted

1 week - are these duplications?

could send proof copies?

quicker than print

2 weeks - need to negotiate - want 4

One week from approval to print to get to EPA. 6/19/15 target - must be Friday

readable copy of RMPs

30 days

30 days

60 days

start discussions with FWS about this

	Step	Due Date	Days to complete	Notes	Included Steps
1	Direction to State Directors	1/23/2015			
2	ADPP Data to NOC	2/13/2015	21		The Pink and Blue steps are concurrent and develop in the Purple/Final EIS
3	Data to FWS	2/20/2015	7	The next steps are concurrent	
4	Subregions revise Chapter 2 with ADPP	2/20/2015	28	Subregions engage Cooperating Agencies	
5	NOC completes CEA tables	3/13/2015	21		
6	CEA Analysis Complete	4/17/2015	35		
7	Direct and Indirect Analysis Complete	3/27/2015	35		Revise Comment Report; Direct and Indirect Analysis Complete
8	BLM/FS ID Teams Review, Response and Modifications for D/I Analysis	4/3/2015	7		
9	BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	4/10/2015	7	*Begin chapter 2 presentations to cooperators/WO in preparation for reviews	
10	Consistency, policy and initial legal review by IMT	4/17/2015	7	Key staff sequestered -Denver?	
11	Response and Modifications	4/21/2015	4	processing as available - Key staff sequestered	
12	CEA Analysis Review and Modifications	4/24/2015	7	*SOL can start reviewing, but will not have final/clean yet	BLM/FS CEA Coordinator Review; BLM/FS CEA Coordinator revises CEA based on ID-teams comments
13	DRAFT FEIS	4/25/2015	1	Key staff sequestered throughout next steps - M St 4th Floor - on call/responding	Draft Plans; BLM/Contracts compile, format, tech edit, and QA PLUPA/FEIS based on CEA review and IMT review
14	Concurrent WO/(Cooperating Agency Review in subregions)	5/9/2015	14		
15	Reviewed Plans to states for corrections/clean up	5/11/2015	2	key staff sequestered - processing as available	Reviewed Plans to states for corrections/clean up; States respond to Cooperating Agency comments
16	Final SOL Review of clean documents	5/18/2015	7		Final SOL Review; Subregional Teams make edits based on SOL Review
17	BLM/Contractors make modifications in Public Review versions of the FEIS	5/22/2015	4		
18	Interagency Leadership Briefing	5/22/2015			
19	Secretaries of DOI and USDA Briefing - Approval to Print	5/22/2015	0	7 days to printing	
20	Camera-ready copy to GPO/PDF for website	5/26/2015	4		
21	Printing and distribution by GPO	6/9/2015	14		
22	Publish Proposed Plan EISs (falls on a Friday per EPA requirements)	5/29/2015	7	Must be a Friday	
23	Begin work on RODS	5/29/2015			
24	ID Teams begin work on Approved RMPs	5/29/2015			
25	First Draft of RODs	6/26/2015	28		First Draft of RODs; WO Review of Approved RMPs/RODs; Subregional Teams make edits based on WO review
26	Protest Period Ends (30 day mandatory protest period)	6/29/2015	31		
27	SOL Review/Second Draft of RODs	7/10/2015	14		SOL Review/Second Draft of RODs; Subregional Teams make edits based on SOL review
28	Protest Resolution Process Ends	7/29/2015	30		
29	Governor's Consistency Review Ends (60 day mandatory governor consistency review)	7/28/2015	60		
30	Draft ROD for Sec. Review	7/24/2015	14		
31	Interagency Leadership Briefing	7/29/2015	1		Interagency Leadership Briefing; Respond to Governor's Consistency Review comments if any received
32	Secretaries of DOI and USDA Briefing	7/30/2015	1		
33	RODs are signed	7/31/2015	1		Steps not included: respond to Governors Consistency, print/publish RODs/ARMPS
	Formal Consultation for Utah, Wyoming and Montana revision	8/16/2015	135	BO/BA with FWS - 135 days	

**Brent Ralston**

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**From:** Jeffery Foss  
**Sent:** Sunday, December 14, 2014 12:49 PM  
**To:** Timothy Murphy  
**Cc:** Peter Ditton; Jonathan Beck; Brent Ralston  
**Subject:** Re: Schedule

Hope we keep the urgency and get closure  
Jeff

Sent from my iPhone

On Dec 12, 2014, at 8:55 PM, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)> wrote:

Sent from my iPhone

Begin forwarded message:

**From:** Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>  
**Date:** December 12, 2014 at 5:48:10 PM MST  
**To:** Donald A Simpson <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Jamie E Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Amy L Lueders <[alueders@blm.gov](mailto:alueders@blm.gov)>, Ruth L Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Jerry Perez <[jperez@blm.gov](mailto:jperez@blm.gov)>, James G Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, Timothy M Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Ronald L Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Michael D Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>, Celia Boddington <[cbodding@blm.gov](mailto:cbodding@blm.gov)>  
**Cc:** Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>, Joseph Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Jenna Whitlock <[jwhitloc@blm.gov](mailto:jwhitloc@blm.gov)>  
**Subject:** Schedule

Team GSG: Thank you for riding tall this week through much uncertainty regarding the CROmnibus and the sage grouse rider. Steve and Ed will both be back in the office Monday and we'll get a call set up. For now, though, you should know that our schedules and the urgency of the effort are unaffected by the rider. More on that Monday.

Our goal is to get you all the various information you need by mid/late next week for each of your plans so that you can march onward with your analysis. Nevada is going to lag behind (despite Amy's great efforts), but I believe we can get the others moving in a matter of days.

We're almost there! Have a nice weekend...you deserve it.

Neil



**National Greater Sage-Grouse Planning Strategy  
Idaho & Southwestern Montana Sub Region  
Greater Sage-Grouse Effort  
Idaho State Director Update  
August 13, 2012**



## **1. National/Regional Coordination**

### **a. State Director Decision Calls**

Last call was held on August 10<sup>th</sup>, discussing topics including: the process for State Plans to become BLM interim policy; detailed analysis of the no grazing alternative; required design features; and disturbance team recommendations.

On the previous call it was decided that each effort will analyze in detail in at least one alternative a no grazing alternative; the National Policy Team review and approval process was approved and funding for FWS staffing was approved pending final negotiations.

## **2. Contracting Work Efforts**

### **a. EMPSi Document/Process Development Contract**

Work continues on development of the EIS. EMPSi is involved with alternative development, coordination, note taking and administrative record support.

### **b. USGS Cumulative Effects Contract**

USGS is working on a baseline report using range wide data sources. Their initial draft report is expected in August (mid to late) with a final in September (late). An internal version is currently being reviewed by a select team.

### **c. ICF Social and Economic Contract**

ICF continues to work on the social and economic baseline.

### **d. Vegetation Accuracy Mapping**

Leona Svancara with University of Idaho & IDF&G has provided the initial crosswalks between macro groups and the base vegetation maps (LANDFIRE, ReGAP).

## **3. Idaho and Southwestern Montana Sub Regional Effort Coordination**

### **a. Forest Service**

Work continues with the Forest Service to coordinate development of alternatives.

### **b. Montana BLM**

Montana BLM is highly involved in helping to develop alternatives for the plan amendment. The existing Dillon RMP has already completed extensive coordination work with Montana Fish, Wildlife and Parks and much of this direction will be displayed as parts of the alternatives in the plan amendment.



c. Native American Tribes Consultation and Coordination

Coordination occurred through the Wings and Roots Campfire process and the Tribes posed several questions to BLM regarding Air Force activities and their potential to impact sage-grouse: sonic booms killing sage-grouse chicks in the egg prior to hatching and wildfire occurrence as a result of flares. BLM is working with the Air Force to compile relevant existing data to share with the Tribes in August or September.

d. Idaho Governor's Task Force

The Task Force commissioned by Governor Otter has developed a map specific to their proposal which delineates Core, Important and General areas to be addressed in management guidance that they are still working on. This plan has been released for public comment and has received significant interest. The State is working to incorporate comments and is expected to provide BLM a more complete version soon. The State has also requested USFWS's review of their approach. USFWS has responded and indicated that the approach is a good start and could benefit from some additional considerations.

e. Cooperating Agencies

BLM continues to work with local Cooperating Agencies and has approved MOUs with most of the agencies that have expressed interest.

A Cooperating Agency call was held on July 5<sup>th</sup> and another is scheduled for August 9<sup>th</sup>.

f. Resource Advisory Councils

Paul Makela presented PPH maps and process for the Twin Falls RAC group at a recent meeting.

g. Sage-Grouse Local Working Groups

h. Other Coordination

#### 4. EIS Development

a. Chapter 1 – Purpose and Need – Template complete for sub regional efforts.

b. Chapter 2 – Alternatives – Template for chapter in development.

i. ACECs

1. ID/swMT have received several ACEC nominations for consideration in the amendments process:

a. Greater Yellowstone Coalition

i. Dillon, MT Core Areas

ii. Eastern Idaho Uplands Local Working Group Area

iii. Upper Snake Local Working Group Area

b. Wild Earth Guardians

i. Range-wide Priority Habitat – all PPH minus oil and gas existing development; this translates into all PPH in Idaho

c. Western Watersheds Project

- i. Previously submitted Jarbidge Field Office sage-grouse ACEC nominations
      - ii. Previously submitted Bruneau Field Office sage-grouse ACEC nominations
    2. Each Field Office has assessed the potential identification of ACECs and have developed an internal BLM proposal.
    3. Sub-Regional coordination to determine and document Relevance and Importance
      - a. Meetings were held in Twin Falls, Idaho Falls and Boise Districts to discuss and evaluate proposals. Preliminary evaluations found that areas nominated for ACEC consideration met relevance and importance values if they were in areas that have been identified as having the highest conservation value to maintaining greater sage-grouse populations.
  - ii. ID/swMT Alternative
    1. Base Map
      - a. Discussion have been initiated regarding existing rights, leases, activities on BLM lands and potential approaches for addressing these in the EIS. Based on these discussions there will not be any need to adjust PPH/PGH boundaries or delineations from the existing map.
    2. Management Actions/Conservation Measures
      - a. Defining these measures is the next step in development process for the alternative. A series of subcommittees lead out of the State Office with input and support from the Field Offices will be used during initial development of these measures.
    3. Alternative Development
      - a. Several small teams were convened to draft initial guidance for this alternative. An alternative development workshop was held in Boise on July 24<sup>th</sup> to discuss and refine the approaches. As a result of this workshop each team was tasked with some additional refinements or augmentation to the direction which is due back to the State Office on August 8<sup>th</sup>.
- c. Chapter 3 – Affected Environment
  - i. Template developed, NOC is working on the cumulative effects baseline in coordination with USGS which will provide the foundation from which the existing environment will be developed. The ID Team will finish compiling this description by augmenting the baseline description to incorporate other pertinent sub regional information. A draft is being reviewed by a select group currently and the final baseline report is expected by the end of September.
- d. Chapter 4 – Environmental Consequences
  - i. Work on No Action ongoing, ID Teams working on GIS maps and acreage calculations.
  - ii. Reasonably Foreseeable Development Scenarios
    1. Oil and Gas
    2. Geothermal
    3. Renewable – Wind and Solar

## 5. Project Administration

### a. Administrative Support Proposal

There is a need for additional administrative support to assist with ePlanning implementation, administrative record compilation and various word processing/writer-editor duties. A proposal is currently being developed to address this need.

### b. ePlanning

Training has been held for SO users. The Idaho and southwestern Montana EIS project has been set up in ePlanning. EMPSi is currently working on the external website to display through ePlanning. Chapter 1 Template is uploaded and needs finalized with issue statements.

### c. Budget

### d. Sharepoint Sites

This site is finally up and reliable. Most everyone needing access has access.

### e. Website

Jessica is working with EMPSi to update website and information in the ePlanning framework.

### f. FBMS/Contract Administration

## 6. FOIA

## 7. Preliminary Priority Habitat Maps

## 8. Data Needs

- a. Several data needs calls have occurred in the last month and progress is moving forward.

## 9. Schedule

### a. Scoping – Ended March 23, 2012

- i. Scoping Report – Completed May 22, 2012

### b. Alternative Development

- i. ACEC Evaluations

- 1. *Initial Relevance and Importance Findings to be shared and approved with local line officer – August/September 2012.*

- 2. *Evaluation Report to be compiled – August/September 2012.*

- ii. ID/swMT Specific Alternative

- 1. *Management Actions and Conservation Measures have been identified and are currently being refined – August 2012.*

### c. Existing Environment

- i. *Sub Regional work awaiting completion of cumulative effects baseline – September 2012.*

**Brent Ralston**

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**From:** Beck, Jonathan  
**Sent:** Monday, June 02, 2014 8:17 PM  
**To:** Brent Ralston  
**Cc:** Anne Briggs; Kurt Wiedenmann; Anne Briggs  
**Subject:** Re: Nevada section in the Jarbidge RMP planning area

Thanks Brent. Jon

On Mon, Jun 2, 2014 at 3:44 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Jon,

Yes, I've been thinking about this and want to bring in the Jarbidge and Elko Field Managers to discuss. I was going to talk to Bryan Fuell next week when I see him at training. There may be some description needed in the amendment FEIS, but I suspect most will occur in the ROD. Both amendment RODs should be on the same time schedule so the delay for Nevada plan is not a factor currently.

Sent from my iPad

On Jun 2, 2014, at 3:18 PM, "Beck, Jonathan" <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:

Something to think about. BLM administered land in Nevada covered under the Nevada sage grouse effort. I though this was covered under our effort. Brent do you know when the Nevada decision will be ready? Jon

----- Forwarded message -----

From: **Whitlach, Heidi** <[hwhitlach@blm.gov](mailto:hwhitlach@blm.gov)>  
Date: Mon, Jun 2, 2014 at 3:13 PM  
Subject: Nevada section in the Jarbidge RMP planning area  
To: Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Codie Martin <[cjmartin@blm.gov](mailto:cjmartin@blm.gov)>

Jon:

Just wanted to bring this up because we haven't talked about it. We need to remember in the decision-making for the Jarbidge RMP the acres we have in Nevada. If we wait to do the Jarbidge RMP ROD until the ID/SW MT GRSG Amendment ROD is out, we will also have to wait for the NV/CA GRSG Amendment ROD as well. My understanding is that the section we have in the planning area in NV gets managed as per the NV/CA GRSG Amendment ROD.

The Nevada and Northeastern California Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement states "There are approximately 77,800 acres of public lands in Elko County, Nevada, located north of the Humboldt-Toiyabe National Forest and south of the Idaho-Nevada state line, adjacent to the Bruneau and Jarbidge field offices in Idaho. Due to their remoteness from other BLM-administered lands in Nevada and because they are contiguous to major blocks of public lands in Idaho, a Memorandum of Understanding between the BLM Nevada and BLM Idaho State Offices transfers administration of those lands to the BLM Idaho State Office. For purposes of the GRSG LUPAs in Idaho and in Nevada, planning

for these lands will occur through the Nevada and Northeastern California Greater Sage-Grouse LUPA/EIS, and the regulatory measures/decisions that are put in place for the GRSG through the record of decision will be implemented and administered by the Jarbidge and Bruneau field offices in Idaho. Therefore, the mapped decision and analysis area for the Nevada and Northeastern California LUPAs/EIS will include lands administered by the Jarbidge Field Office in Nevada and end at the Nevada state line (see Table ES-1, Land Management within the Planning Area, and Figure ES-1, Nevada and Northeastern California Greater Sage-Grouse Sub-region Planning Area..."

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*Heidi*

Heidi Whitlach  
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## Brent Ralston

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**From:** Roberson, Edwin  
**Sent:** Wednesday, June 04, 2014 6:43 AM  
**To:** Timothy Murphy; Jeffery Foss; Brent Ralston  
**Subject:** Re: Conference Call Prep--re: Response to NPT Guidance

Tim, I had a misstatement in the last line of my email to you all this morning. It should have said: After we discuss these questions and reconcile these issues, we can confirm that the data is ready to send to the NOC for the roll up.,

On Wed, Jun 4, 2014 at 8:35 AM, Roberson, Edwin <[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:  
Tim,

In preparation for our discussion later today, I wanted to provide you with some of the concerns we would like to go over with you and your team regarding the info memo you sent us on 5/29/14. Hopefully you can provide us with some clarification/rationale on a few inconsistencies with the NPT allocation recommendations.

### For Priority Habitat (Core/Important):

What is your rationale for managing medial (important) habitat as a ROW avoidance area, instead of managing it as a ROW exclusion area for wind/solar?

Idaho is only closing areas to fluid mineral development that are low potential. What is the biological rationale for opening moderate and high potential areas for development? Are you applying NSO to any core (priority) areas?

Are core and important areas closed to non-energy leasables?

For mineral materials, what is the rationale for leaving medial (important) areas open? For existing sites, are they subject to the 3% disturbance cap and no net unmitigated loss?

### For General Habitat

What is your rationale for not managing general habitat as a ROW avoidance area for solar/wind?

What is your rationale for not managing general habitat as a ROW avoidance area for high-voltage transmission ROWs?

### Adaptive Management

Is BLM Idaho's adaptive management strategy consistent with the AM sideboards? How does the AM strategy apply to other allocation categories other than ROWs?

### Disturbance

What do you mean when you say that BLM Idaho is "inconsistent with specific biological units." The NPT guidance allowed the sub-regions to provide for their own unit, as long as information could be aggregated up to the PAC level. Also – you state that the cap is only subject to "seasonal habitats of highest concern" – does this mean that you are not applying the cap to all general and priority (core, important, and general)? Who makes the determination of what is of a "highest concern?"

Will the no net unmitigated loss be applied to core, important, and general habitat?

How much medial (important) habitat lies within the PAC boundaries?

### Cross-Jurisdictional Coordination

Are there any inconsistencies with how the Forest Service plans to manage their priority and general habitat areas?

Have you resolved all of the FWS stop-light matrix concerns (shifting reds to yellows or greens)?

I look forward to our discussion. After we discuss these questions and reconcile these issues, we can confirm that the data you sent to the NOC is ready for the roll-up or you can send any changes in data on to the NOC. Thank you. Ed

**Brent Ralston**

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**From:** Pyron, Jason  
**Sent:** Thursday, August 07, 2014 3:42 PM  
**To:** Brent Ralston  
**Subject:** Fwd: Great Basin adaptive management triggers  
**Attachments:** Adaptive Management Triggers draft NEVADA-CA 6-16-14.docx; Adaptive Management Triggers draft OREGON 7-23-14.docx; Adaptive Management Triggers\_draft\_UTAH 8-1-14.docx

For your enjoyment

----- Forwarded message -----

From: **DElia, Jesse** <[jesse\\_delia@fws.gov](mailto:jesse_delia@fws.gov)>  
Date: Mon, Aug 4, 2014 at 4:50 PM  
Subject: Re: Great Basin adaptive management triggers  
To: "Dillon, Jeffrey" <[jeffrey\\_dillon@fws.gov](mailto:jeffrey_dillon@fws.gov)>, Jason Pyron <[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)>  
Cc: Jay Martini <[jay\\_martini@fws.gov](mailto:jay_martini@fws.gov)>, Betsy Herrmann <[Betsy\\_Herrmann@fws.gov](mailto:Betsy_Herrmann@fws.gov)>, Jeff Everett <[jeff\\_everett@fws.gov](mailto:jeff_everett@fws.gov)>, Ronald Baxter <[ronald\\_baxter@fws.gov](mailto:ronald_baxter@fws.gov)>, Pat Deibert <[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)>, Dawn Davis <[dawn\\_davis@fws.gov](mailto:dawn_davis@fws.gov)>

Thanks for the quick response everyone. Jason, I have the State Plan, but if you could add your AM triggers doc to this e-mail string all of the sage-grouse folks in the Great Basin will have all the latest docs. Thanks,

Jesse

On Mon, Aug 4, 2014 at 8:07 AM, Dillon, Jeffrey <[jeffrey\\_dillon@fws.gov](mailto:jeffrey_dillon@fws.gov)> wrote:  
Oops. Replied to Jesse only this morning. Here is the draft Oregon BLM sent out recently. Comments were due last Friday so a clean version should be out this week sometime.

Jeff

~~~~~  
**Jeffrey A. Dillon, Endangered Species Division Manager**

US Fish and Wildlife Service      Phone: 503.231.6179  
Oregon Fish and Wildlife Office      Fax: 503.231.6195  
2600 SE 98th Avenue, Suite 100      Email: [Jeffrey\\_Dillon@fws.gov](mailto:Jeffrey_Dillon@fws.gov)  
Portland, Oregon 97266      <http://www.fws.gov/oregonfwo>  
~~~~~

On Fri, Aug 1, 2014 at 2:15 PM, DElia, Jesse <[jesse\\_delia@fws.gov](mailto:jesse_delia@fws.gov)> wrote:  
Can you let me know if your state BLM folks have drafted adaptive management triggers and what percentages they are using (e.g., 10% soft trigger and 20% hard trigger for both population and habitat). Trying to figure out how closely these match for the Great Basin plans.

Thanks,



Jesse

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**Jesse D'Elia**

*Candidate Species Conservation Coordinator*

Endangered Species Division, Pacific Regional Office

U.S. Fish and Wildlife Service

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**Jesse D'Elia**

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**Jason Pyron**

Sage-Grouse Coordinator - Candidate Conservation

Idaho Fish & Wildlife Office

1387 S Vinnell Way, Room 368

Boise, Idaho 83709

Office (208-685-6958), Fax (208-378-5262)

[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)

**Population Based Triggers**

	<b>SOFT TRIGGER</b>	<b>HARD TRIGGER</b>
<b>INDIVIDUAL LEKS</b>	>50% probability of a 10% change in an individual lek population for 3 years running, between the lek and the average for its lek cluster →	> 50% probability of 10% change in an individual lek population for 5 years running
<b>LEK CLUSTERS</b>	>50% probability of a 10% change in populations for 3 years running, between a lek cluster and its BSA moving average* →	>50% probability of a 10% change in populations for 5 years running, between a lek cluster and its BSA moving average*
<b>BSA (PAC)</b>	A declining moving average at the regional scale (not explained by climatic conditions) for 3 years running →	If the moving average continues its decline for 5 years running
<b>CATASTROPHIC EVENTS</b>	> 50% decline in population of a lek on any given year →	> 50% in the population of lek for 2 years running

\* Duration for the calculation of the moving averages need to be determined... 10 years? 8 years? 5 years?

**Habitat Based Triggers**

	<b>SOFT TRIGGER</b>	<b>HARD TRIGGER</b>
<b>LEK or LEK CLUSTERS</b>	=> 5% disturbance of any individual seasonal habitat type	=>10% disturbance of any individual seasonal habitat type
<b>BSA (PAC)</b>		
<b>25-65% landscape sagebrush cover</b>	=> 2% change in landscape sagebrush cover	=> 5% change in landscape sagebrush cover
<b>&gt; 65% landscape sagebrush cover</b>	=> 5% change in landscape sagebrush cover	=> 10% change in landscape sagebrush cover <b>OR</b> if landscape sagebrush cover falls below 70%

## Chapter 2: Adaptive Management

July 23, 2014

### Adaptive Management

Adaptive Management is a decision process that promotes flexible resource management decision making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps with adjusting resource management directions as part of an iterative learning process. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity. It is not a trial and error process, but rather emphasizes learning while doing. Adaptive management does not represent an end in itself, but rather a means to more effective decisions and enhanced benefits. On February 1, 2008, the Department of the Interior published its Adaptive Management Implementation Policy (522 DM 1). The adaptive management strategy presented within this EIS complies with this policy and direction.

In relation to the BLM and Forest Service's National Greater Sage-grouse Planning Strategy (2012), adaptive management will help identify if GRSG conservation measures presented in this EIS contain the needed level of certainty for effectiveness. Principles of adaptive management will be incorporated into the conservation measures in the plan to ameliorate threats to a species, thereby increasing the likelihood that the conservation measure and plan will be effective in reducing threats to GRSG. The following provides the adaptive management strategy for the Oregon Sub-region RMPA/EIS.

### Adaptive Management and Monitoring

This RMPA/EIS contains a monitoring framework (**Appendix G**, Greater Sage-Grouse Monitoring Framework), which includes an effectiveness monitoring component. The agencies intend to use the data collected from the effectiveness monitoring to identify any changes in habitat conditions related to the goals and objectives of the plan and other range-wide conservation strategies (DOI 2004; Stiver et al. 2006; USFWS 2013a). The information collected through the Monitoring Framework Plan outlined in **Appendix G** would be used by the BLM to determine when adaptive management hard and soft triggers (discussed below) are met.

An adaptive management working group will help BLM to identify the causal factor that may have tripped the adaptive management trigger. A causal factor is a threat that USFWS identified in its 2010 listing determination (USFWS 2010). While one or more causal factors can be linked to a habitat or population decline, this does not assume a cause-and-effect relationship. A plethora of factors has been suggested as affecting sage-grouse populations and habitats throughout the species' range. These factors can interact in a myriad of complex relationships that can be difficult to tease apart. It can be difficult to separate proximate factors from ultimate factors leading to population declines. For example, predation is the most commonly identified cause of mortality for GRSG. However, where

habitat is not limited and is of good quality, predation is not a threat to the persistence of the species. Thus, predation can be a proximate cause for a declining GRSG population, while habitat degradation, landscape fragmentation, and human populations may be the ultimate causal factor.

The adaptive management working group, in addition to assessing causal factors, will provide recommendations to the appropriate BLM authorizing official (decision maker) regarding the adaptive management responses to address the trigger. When organizing the adaptive management working group, the BLM will invite participation from USFWS and ODFW. If necessary, this group can reach out to the USFS, NRCS, and other Federal/state/tribal agencies for added information.

### **Adaptive Management Application Scale**

In Oregon, Core Area habitat encompasses approximately 90 percent of the breeding populations of GRSG on 38 percent of the species' range (Hagen 2011). Core Area and PPMA are equivalent to Priority Areas for Conservation (PACs) identified in the Conservation Objectives Team (COT) report developed by the US Fish and Wildlife Service (USFWS 2013). Retention of GRSG habitats within PACs is the COT's highest priority. However, "sage-grouse habitats outside of PACs may also be essential, by providing connectivity between PACs, habitat restoration and population expansion opportunities, and flexibility for managing habitat changes that may result from climate change" (USFWS 2013: page 36). While this adaptive management strategy is focused on PACs, the identification of lek complexes providing key connectivity habitat between PACs may identify additional areas where adaptive management triggers could be applied.

The ODFW in cooperation with the SageCon Partnership subdivided PACs in Oregon into 21 individual units and gave each unit a unique name. The BLM refers to these units as "Oregon PACs" and will monitor adaptive management triggers at this scale and, for the population trigger, at the finer scale of lek complex. Data from monitoring adaptive management triggers can be aggregated up to larger reporting units including GRSG population and WAFWA Management Zone.

### **Adaptive Management Triggers**

Adaptive management triggers are essential for identifying when potential management changes are needed in order to continue meeting sage-grouse conservation objectives. The BLM will use two types of triggers for specific populations and responses: soft triggers and hard triggers. These triggers are not specific to any particular project, but identify habitat and population thresholds.

#### *Soft Triggers*

Soft triggers represent an intermediate threshold indicating that management changes are needed at the implementation level to address habitat or population losses. If a soft trigger is tripped, the BLM will apply more conservative or restrictive implementation conservation measures to mitigate for the causal factor(s) in the decline of populations and/or habitats, with consideration of local knowledge and conditions. Soft trigger responses can come in the form of design features, BMPs, or site specific mitigation measures.

Examples of soft trigger responses could include (but are not limited to) the following for future BLM/FS implementation level actions:

- Extending seasonal restrictions for seasonal surface disturbing activities (provided as stipulations to a ROW grant or a Condition of Approval to an oil and gas lease),
- Reprioritizing wild horse and burro gathers;
- Applying sequential development after reclamation;
- Temporary area closures related to travel management (2-year maximum);
- Modifying seasons of use for livestock grazing through annual permit authorizations; and/or
- Applying additional restrictions on discretionary activities, or rejecting the application if mitigation criteria cannot be met.

#### *Hard Triggers*

Hard triggers represent a threshold indicating that immediate action is necessary to stop a severe deviation from GRSG conservation objectives set forth in the BLM plans. The response to a hard trigger is essentially “hard-wired”; that is, upon reaching the trigger, a more restrictive alternative, or an appropriate component of a more restrictive alternative will be implemented. After the hard-trigger is tripped, the BLM will determine the causal factor(s) and develop and implement a corrective strategy. In the event that new scientific information becomes available demonstrating that the hard wired response would be insufficient to stop a severe deviation from GRSG conservation objectives set forth in BLM plans, the BLM will immediately implement a formal directive, akin to BLM IM 2012-043, to protect GRSG and its habitat and to ensure that conservation options are not foreclosed. These actions could include one or more of the following (which may require subsequent NEPA):

- Temporary closures (as directed under BLM IM 2013-035)
- Immediate implementation of interim management policies and procedures through the BLM directives system
- Initiation of a new LUPA to consider changes to the existing LUP

#### **Population Trend Triggers**

Trend is measured by the change in the average number of males per active lek, the number of active leks, and the annual rate of change (percent change) in total numbers of males counted on leks between consecutive years. The ODFW used annual percentage change in estimating population size relative to the 2003 population to establish thresholds for management actions (Hagen 2011). Since 1980, statewide population size has fluctuated around an average of 99 percent of the 2003 benchmark. Therefore, habitat amounts and quality available in 2003 is assumed to be sufficient to sustain this population size and distribution into the future.

Population triggers for adaptive management are based on the 5-year moving window average of annual rates of population change. Analysis of long term trend data (between 10 and 40 years) from 22 Oregon leks that experienced a decline indicate a lek may average 4.1 years (SD = 2.6 years) of inactivity and rebound; most of the sample rebounded in a period of 7 years or less. Thus, leks may have no birds present for up to 7 years, but are defined as occupied.

Population trend data will be evaluated at two overlapping scales:

1. Lek Complex :
  - a. If a lek complex is 10 percent or more below the previous 5-year moving window average for the complex for 3 years, then the soft trigger is tripped. If the trend continues for an additional 2 years (for a total of 5 years) then the hard trigger is tripped.
  - b. If a lek complex has >50 percent attendance decline within the first year immediately following a known disturbance (e.g., fire, new authorized activity), then a soft trigger is hit. If it is sustained for a total of 2 years, then a hard trigger is hit.
  - c. The trigger response area would be the seasonal habitat and use locations associated with the lek that is specifically affected by the cause.
2. Oregon PAC. If the 5-year moving window average of annual rates of population change in the PAC indicates an annual population decline of  $\leq 7$  percent for three consecutive years then the soft trigger is tripped. If the population trend indicates an annual decline of  $> 7$  percent for three consecutive years, or a decline of  $< 7$  percent for five or more consecutive years, then the hard trigger is tripped.

### Habitat Trend Triggers

The trigger for habitat trend is the amount of the landscape in sagebrush cover measured at the scale of Oregon PAC. The vegetation management objective for sage-grouse habitat in this EIS is to provide a minimum of 70 percent of the area capable of supporting sagebrush plant communities. Capable habitat is defined as sagebrush cover  $\geq 5$  percent and tree cover  $< 5$  percent. The remaining approximately 30 percent includes areas of juniper encroachment, non-sagebrush shrubland, and grassland that should be managed to increase available habitat within GRSG range. The "70/30" goal is based on a habitat assessment described in BLM Technical Bulletin 417 (Karl and Sadowski 2005).

The habitat trigger will be evaluated at only one scale, Oregon PAC. Sagebrush availability, both existing and potential, will be measured using the procedures outlined in the GRSG Monitoring Framework (Appendix G). In 2005, the ODFW determined sagebrush cover on BLM Districts approximate the 70/30 goal (Hagen 2011). Using a different dataset (ILAP) and measuring capable habitat (i.e., sagebrush cover  $\geq 5\%$  and tree cover  $< 5\%$ ), the BLM found 2 PACs on Burns District and 3 PACs on Vale District had  $< 70$  percent sagebrush cover (range 59.6% to 68.4%; see Table 3-XX Percent Existing and Potential Sagebrush Cover). Understanding that there are natural fluctuations in sagebrush cover types, the 70/30 goal serves as an adaptive management strategy for sage-grouse habitat (Hagen 2011). Short-

term losses of sagebrush (e.g., fire or insect defoliation) are to be expected. However, sagebrush landscape cover  $\leq 25$  percent has a low probability of maintaining sage-grouse leks, while  $>65$  percent sagebrush cover has a high probability of sustaining sage-grouse populations (Aldridge et al. 2008; Wisdom et al. 2011; Knick et al. 2013; Chambers et al. *in press*). Increases in landscape cover of sagebrush have a constant positive relationship with sage-grouse lek probability at between about 25 percent and 65 percent landscape sagebrush cover (Knick et al. 2013). Thus, for purposes of habitat triggers, the categories of the percent landscape sagebrush cover that would apply are 25-65 percent and above 65 percent, as identified in the Matrix Based on Concepts of Resistance and Resiliency (Chambers et al. *in press*).

In Oregon PACs with 25-65 percent sagebrush cover, a soft trigger is tripped. A hard trigger is tripped in these areas if trend monitoring indicates a 5 percent or greater decline of sagebrush cover, or if sagebrush cover falls below 30 percent. In either case, the triggers remain tripped until the percent sagebrush is  $>65\%$ .

### Trigger Responses

When a soft trigger is hit, the causal factor will be identified and management actions would be adjusted to ameliorate the cause by application of project level adaptive management contained in the authorization and for future similar authorizations. Management would be adjusted based on the causal factors at the appropriate scale (lek complex and/or Oregon PAC). GRSG populations and habitat would continue to be monitored annually.

When a hard trigger is hit due to disturbance, more restrictive allocations and/or management actions would be implemented within the Oregon PAC. When a hard trigger is hit due to non-anthropogenic disturbance, pending and new development could continue within the affected Oregon PAC(s) if:

- a) As designed, the project would have no impact on the GRSG population, or
- b) The project has been modified so that it would not have impacts on the GRSG population.

If soft triggers are hit for **both population and for habitat**, this will result in a hard trigger response for the Oregon PAC.

Specific **hard trigger** responses in PPMA are:

Causal Factor (Threat)	Adaptive Management Response
Fire	No broadcast burning (pile burning allowed)
	No sagebrush removal for any reason
	Postpone new ROW authorizations
	Focus restoration effort toward the Oregon PAC

Causal Factor (Threat)	Adaptive Management Response
Invasive Grasses	Focus weed treatments in the Oregon PAC within 3 miles of occupied and pending leks
Energy Development	<i>see ROW/Infrastructure below</i>
Sagebrush Removal/Elimination	Do not allow sagebrush removal or manipulation in sage-grouse breeding or wintering habitats for any reason
Livestock Grazing	Sage-grouse habitat on active allotments within the Oregon PAC must be "suitable" per the BLM's GRSG Habitat Assessment Framework (Stiver et al. 2010) or discontinue grazing until a suitable rating is achieved
	Percent utilization of key herbaceous species cannot exceed 35% by volume (light grazing)
Wild Horse Management	Move horses to pasture outside the PAC
	Reduce AUMs
Juniper Encroachment	Prioritize juniper removal to focus on the Oregon PAC or lek complexes where the adaptive management trigger has been hit
Minerals & Associated infrastructure	Allow no new roads to be sited within 4 miles of the occupied or pending leks in the Oregon PAC or lek complex
Recreation	When an existing high traffic use route (defined as >8 vehicle trips per day) is closer than 2.0 miles to an occupied or pending lek implement a seasonal restriction on the route from March 1 to June 30, annually.
	When an existing road is found to have an effect on GRSG population trends, re-route or close road segments causing the effect.
	Where lek viewing has been documented by BLM and ODFW to be negatively impacting lek attendance by GRSG, close those areas to all uses (pedestrian, motorized, mechanized) from March 1 through June 31 annually.
	When SRMAs managed for high density use negatively affect GRSG populations or behavior modify season of use, location of use, or activities allowed in the SRMA.
Right-of-Ways/Infrastructure	Install perch and nesting deterrents on power poles and other tall features within 4 miles of occupied or pending leks
	Focus juniper removal in the PAC within 4 miles of occupied or



Causal Factor (Threat)	Adaptive Management Response
	pending leks
	Close and re-vegetate roads to reduce road density
	Postpone authorization for new high voltage transmission lines (greater than or equal to 100kv) and major pipelines (greater than or equal to 24 inch)

DRAFT

**Proposed Utah GRSG Adaptive Management Triggers – DRAFT  
August 1, 2014**

Population Soft Triggers (any of 1a, 1b, 1c, or 1d AND 2)

- 1a) 4 years of 10% or greater annual decline in average males/lek, based on “trend leks”;
- 1b)  $\geq$  6 years of declining average males/lek, based on “trend leks”; or
- 1c) 40% decline in any single year; or
- 1d)  $\geq$  50% decline in a 4 year period;

AND

- 2)  $\lambda < 1$  in 4 consecutive years, based on all leks in the population area.

Population Hard Triggers (any one of a-d)

*Short term decline*

- a) 4 years of 20% or greater annual decline in males per lek in each year, based on “trend leks”; or
- b) The average males per lek, on trend leks, drops 75% below the 10-year rolling average males per lek, in any given year; or

*Long term Decline*

- c)  $\lambda < 1$  in 6 of the last 6 years, or
- d)  $\lambda < 1$  in 8 of the last 10, based on all leks within the population area.

Habitat Soft Triggers:

- a) 10% loss of nesting (3 mile buffer around occupied leks) or modeled wintering habitat, within an population area; or
- b) 5% loss of modeled essential winter habitat, within an population area; or,
- c) 10% loss of total sage-grouse habitat within an population area; or,
- d) any one fire that burns 5% of habitat (new BLM proposal to address large catastrophic fires).

Habitat Hard Triggers:

- a) 20% loss of total suitable sage-grouse habitat within an population area; or small scale (b, c, d, or e)
- b) 20% loss of nesting (3 mile buffer around occupied leks) within an population area; or
- c) 20% loss of modeled brood-rearing within an population area; or
- d) 20% loss of modeled winter GRSG habitat within a population area; or
- e) 20% loss of modeled essential GRSG winter habitat within a population area.

## Brent Ralston

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**From:** Lauren Mermejo  
**Sent:** Thursday, July 10, 2014 4:33 PM  
**To:** Kathryn Stangl; David Batts; Melvin (Joe) Tague; Brent Ralston; Joan Suther; Earl (Tom) Rinkes; Robert Mickelsen; Quincy Bahr; Randall Sharp; Johanna Munson; Matthew Magaletti; Michael Pellant; Jeremiah (Jeremy) Sisneros; Seth Flanigan; Renee Chi; Sarah Shattuck; Lauren L. Mermejo; levers@blm.gov; cgoodell@blm.gov  
**Subject:** FW: Consolidated table - proposed plan as of morning of July 10, 2014  
**Attachments:** Use of FIAT information in FEIS - Goodell.docx

Sharing an updated version of Oregon's inserts into this document for discussion for tomorrow. Please use this version.  
Thanks,  
Lauren

**From:** Goodell, Craig [mailto:[cgoodell@blm.gov](mailto:cgoodell@blm.gov)]  
**Sent:** Thursday, July 10, 2014 3:26 PM  
**To:** Evers, Louisa  
**Cc:** Joan Suther; Lauren Mermejo  
**Subject:** Re: Consolidated table - proposed plan as of morning of July 10, 2014

Thanks Louisa,

I have added some additional Oregon VG and WFM goals, objectives and actions to Lauren's Use of FIAT Information comparison doc that are relevant to the FIAT Assessment process.

See the attached document.

Craig Goodell, MS  
Fire Ecologist  
Oregon/Washington BLM  
USFS Pacific Northwest Region  
Portland, OR 97208  
(503) 808-6595 (office)  
(503) 407-7658 (cell)

On Thu, Jul 10, 2014 at 2:42 PM, Evers, Louisa <[levers@blm.gov](mailto:levers@blm.gov)> wrote:  
Craig - Joan thought this would help for the FIAT call tomorrow.

Lauren - Joan asked me to work this up as the document sent out concerning the Use of FIAT Information in FEIS is missing nearly all the relevant actions for Oregon. This version of the proposed plan table should make it easier to spot goals, objectives, and actions that mesh with the FIAT paper. Note that this is still a work in progress as we continue to refine the language on the basis of comments from Districts and cooperating agencies.

Joan - as you requested. Down to only 22 pages in this format.

Louisa Evers

Bureau of Land Management

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## Use of FIAT information in FEIS

### NEVADA

#### Vegetation Management

Action G-VEG 2: Utilize BLM and Forest Service GRSG habitat maps, habitat objectives (Table 2-6 for GRSG habitat objectives), and concepts of resistance and resilience (**Appendix F, Greater Sage-Grouse Wildfire and Invasive Annual Grasses Assessment and Concepts of Resistance and Resilience**) to prioritize habitat restoration projects to address the most limiting GRSG habitat components and to connect seasonal ranges.

Action G-VEG 4: Within PPMA and PGMA, prioritize and implement seeding and planting treatments **based on the concepts of resistance and resilience (Appendix F)**. To the extent feasible or available, use local seed collected from intact stands or greenhouse cultivation. To increase seeding success, consider the use of specialized seed drills or other proven and effective methods that may become available based on new science to ensure effective soil and seed contact.

Action G-VEG 9: For Wyoming, Mountain, and Basin Big Sage Communities in PPMA and PGMA:

- Prioritize treatments that focus on enhancing, reestablishing or maintaining the most limiting GRSG habitat component
- Reestablish sagebrush to meet GRSG habitat objectives (Table 2-6)
- Manage sagebrush communities to achieve age-class, structure, cover, and species composition objectives in GRSG habitat (Table 2-6)
- Restore herbaceous understory in brush dominated areas to meet GRSG habitat objectives (Table 2-6)
- Treat areas with cheatgrass and other invasive or noxious species to minimize competition and favor establishment of desired species (Table 2-6)
- **Treat disturbed areas based on the Greater Sage-Grouse Wildfire and Invasive Species Assessment (Appendix F)**

#### Vegetation Management-Invasive Species

Action G-VEG-ISM 2: Prioritize treatments to remove invasive annual grasses to provide the most benefit to GRSG **habitat conditions using Appendix F**.

Action G-VEG-ISM 3: Treat sites within PPMA and PGMA that contain invasive species infestations through an Integrated Pest Management (IPM) approach using fire, chemical,

mechanical, and biological (e.g., targeted grazing) methods based on site potential in accordance **with Fire and Invasive Assessment (FIAT) matrix.**

### **Wildland Fire Suppression**

Action G-WFM 3: Prioritize PPMA over PGMA for conservation and protection during fire operations and fuels management decision-making. When suppression resources are widely available, maximum efforts would be placed on limiting fire growth in PGMA as well. These priority areas would be further refined following completion of the **GRSG Wildland Fire and Invasive Species Assessment (Appendix F).**

Action G-WFM 3: Prioritize PPMA over PGMA for conservation and protection during fire operations and fuels management decision-making. When suppression resources are widely available, maximum efforts would be placed on limiting fire growth in PGMA as well. These priority areas would be further refined following completion of **the GRSG Wildland Fire and Invasive Species Assessment (Appendix F).**

Objective G-WFM-HFM 1: Apply fuels treatments on a landscape level to modify fire behavior characteristics, fire intensity, fire complexity (fire patchiness), fire size, and fire effects in which fire management efforts are enhanced. Apply fuels treatments over the landscape to restore, maintain and conserve ecological function and increase or maintain the ecological sites' **resistance to invasive species and resilience to disturbance (Appendix F).**

### **Fuels Management**

Action G-WFM-HFM 3: Fuels treatments would be designed through an interdisciplinary team process to expand, enhance, maintain, and protect GRSG habitat. Use green strips and fuel breaks, where appropriate, to protect seeding efforts from subsequent fire events.

**In coordination with USFWS and relevant state agencies, develop a fuels management strategy for the BLM and Forest Service with large blocks of GRSG habitat (using the assessment process described in Appendix F)** that considers an up-to-date fuels profile, land use plan direction, current and potential habitat fragmentation, sagebrush and GRSG ecological factors, and active vegetation management steps to provide critical breaks in fuel continuity where appropriate. When developing this strategy, consider the risk of increased habitat fragmentation from a proposed action versus the risk of large-scale fragmentation posed by wildfires if the action is not taken.

Action G-WFM-HFM 9: **In coordination with the USFWS and relevant state agencies, BLM/Forest Service planning units (Districts/Forests) will identify annual treatment needs for wildfire and invasive species management as identified in local unit level Landscape Wildfire and Invasive Species Assessments (Appendix F).** Annual treatment needs would be coordinated on state and regional scales and across jurisdictional boundaries for long-term conservation of GRSG.

Action G-WFM-HFM 10: Tier implementation actions to the local (District or Field Office/Forest) **GRSG Landscape Wildfire and Invasive Species Assessment (Appendix F), utilizing the best available science related to the conservation of GRSG.**

RDF G-WFM-HFM 7: Design vegetation treatments in areas of high fire frequency to facilitate firefighter safety, reduce the potential acres burned, and reduce the fire risk to GRSG habitat. Develop GRSG habitat maps that display existing fuels treatments that can be used to assist suppression activities. Give priority at the project level for implementing specific GRSG habitat restoration projects in annual grasslands, first to sites adjacent to or surrounded by PPMA or that reestablish continuity between GRSG habitats. Annual grasslands are a second priority for restoration when the sites are not adjacent to but within 2 miles of PPMA. The third priority for annual grassland habitat restoration projects are sites beyond 2 miles of PPMA. **The intent is to focus restoration outward from existing, intact GRSG habitat (Appendix F).**

Action G-WFM-PF 5: BLM and Forest Service planning units (Field Offices/Districts and Forests), in coordination with the USFWS and relevant State agencies, **would complete and continue to update GRSG Landscape Wildfire and Invasive Species Habitat Assessments in coordination with the USFWS and relevant state agencies to prioritize at-risk habitats, and identify fuels management, preparedness, suppression and post-fire treatment priorities** necessary to maintain sagebrush habitat to support interconnecting GRSG populations. These assessments and subsequent assessment updates would also be a coordinated effort with an interdisciplinary team to take into account other GRSG priorities identified in this plan. Appendix F describes a minimal framework example and suggested approach for this assessment

## **Adaptive Management**

### **Habitat Trend Triggers**

Triggers for habitat trends will be evaluated at the lek and BSA units. Lek trends incorporate the project boundary and adjoining GRSG seasonal habitats. Site level habitat trends will be based on changes in habitat components using the methodologies in the HAF. These changes would be compared to the GRSG habitat objectives in table 2-6. The BSA would be based on percent of sagebrush cover across the landscape. The categories of the percent landscape sagebrush cover that would apply are the 25-65 percent level and the above 65 percent level as identified in the **Matrix Based on Concepts of Resistance and Resiliency (Chambers et al. in press).**

## **IDAHO**

### **Greater Sage-Grouse Management Areas**

- 5.4 MA-4: Prioritize activities to protect, enhance and restore GRSG habitats (i.e. suppression activities, fuels management activities, vegetation treatments, invasive species treatments, etc.) first by Conservation Area, if appropriate (CA under adaptive management or at risk of engaging adaptive management), followed by

Core Management Zones, then Important Management Zones then General Management Zones within the Conservation Areas. Local priority areas within these zones will be further refined as a result of completing the GRSG Wildfire and Invasive Species Habitat Assessments as described in Appendix D. This could include projects outside GRSG habitat when those projects would provide a benefit to GRSG habitat.

### **Wildfire Preparedness/Prevention**

- 9.3 WFP-3: Annually incorporate into existing fire management plans results and updates from the Wildfire and Invasive Species Habitat Assessments described in Appendix D, to communicate/explain the resource value of GRSG habitat, including fire prevention messages and actions to reduce human-caused ignitions.
- 9.5 WFP-5: Continue annual coordination meetings held between cooperating agencies that have fire suppression responsibilities. Incorporate Rangeland Fire Protection Associations and other stakeholders into this coordination. Discuss priority suppression areas and distribute maps showing priority suppression areas at both the Conservation Area and the local office levels as based on the adaptive management strategy and Wildfire and Invasive Species Assessments.
- 9.7 WFP-7: As part of the Wildfire and Invasive Species Assessments, identify roads, trails, and recreational use areas with high frequency of human caused fires within or adjacent to the Core or Important Management Zones. Consider these areas during annual fire restriction evaluations, and as appropriate, through site specific management.
- 9.9 WFP-9: Implement activities identified within the Wildfire and Invasive Species Assessments.

### **Wildfire Suppression**

- 10.1 WFS-1: Complete Wildland Fire and Invasive Species Assessments as described within Appendix D within 1 year of the Record of Decision and incorporate results into appropriate Fire Management Plans as they are completed. Wildfire and Invasive Species Habitat Assessments are interdisciplinary evaluations of the threats posed by wildfire and invasive species, as well as identification of priority areas/treatment opportunities for fuels management, fire management, and restoration. These assessments identify priority areas and describe strategies for fuels management, suppression and restoration activities.
- 10.2 WFS-2: As part of the Wildfire and Invasive Species Assessments incorporate a wildfire response time analysis focusing on response time to identified priority areas within Core and Important Management Zones or on those fires that have the potential to impact Core and Important Management Zones. Incorporate findings into Unit Initial Attack program.
- 10.3 WFS-3: As part of the Wildfire and Invasive Species Assessment incorporate a water capacity analysis for suppression purposes, including potential private water



sources. Provide water availability to respond to fire in or threatening CMZ and IMZ during initial attack.

- 10.4 WFS-4: During high fire danger conditions, stage initial attack and secure additional resources closer to priority areas identified in the Wildfire and Invasive Species Assessments, based on anticipated fires and weather conditions, with particular consideration of the West Owyhee, Southern and Desert Conservation Areas to ensure quicker response times in or near GRSG habitat.

### **Fuels Management**

- 11.4 FM-4: Develop a fuels continuity and management strategy to expand, enhance, maintain and protect GRSG habitat informed by the Wildfire and Invasive Species Assessments completed as described in Appendix D.
- 11.5 FM-5: When developing the fuels management strategy as part of the Wildfire and Invasive Species Assessment described in Appendix D consider up-to-date fuels profiles; land use plan direction; current and potential habitat fragmentation; sagebrush and GRSG ecological factors; active vegetation management steps to provide critical breaks in fuel continuity where appropriate; incorporate a comparative risk analysis with regard to the risk of increased habitat fragmentation from a proposed action versus the risk of large scale fragmentation posed by wildfires if the action is not taken.

### **Wildfire Restoration/Rehabilitation – Emergency Stabilization and Rehabilitation**

- 12.1 ESR-1: Utilize the findings and Restoration/Rehabilitation Strategy developed as part of the Wildfire and Invasive Species Assessment process described in Appendix D to determine if rehabilitation actions are needed, based on ecological potential, and direct emergency stabilization and rehabilitation (ESR) (BLM) or Burned Area Emergency Restoration (BAER) (FS) actions after fire.
- 12.2 ESR-2: Incorporate GRSG Habitat Management Objectives into ESR/BAER plans based on site potential and in accordance with the Restoration/Rehabilitation Strategy developed as a result of the Wildfire and Invasive Species Assessments.

### **Habitat Restoration and Vegetation Management**

- 13.2 VEG-2: Implement vegetation rehabilitation or manipulation projects to enhance sagebrush cover or to promote diverse and healthy grass and forb understory to achieve the greatest improvement in GRSG habitat based on Wildfire and Invasive Species Assessments, HAF assessments, other vegetative assessment data and local, site specific factors that indicate sagebrush canopy cover or herbaceous conditions do not meet habitat management objectives (i.e. is minimal or exceeds optimal characteristics). This may necessitate the use of prescribed fire as a site preparation technique to remove annual grass residual growth prior to the use of herbicides in the restoration of certain lower elevation sites (e.g., Wyoming big sagebrush) but

such efforts will be carefully planned and coordinated to minimize impacts to sage-grouse seasonal habitats.

### **Invasive Species**

- 14.1 Invasive Species (INV)-1: Incorporate results of the Wildfire and Invasive Species Assessments into projects and activities addressing invasive species.

### **Monitoring**

- 21.1 Monitoring (MON)-1: Annually complete a review of Wildfire and Invasive Species assessment implementation efforts within GRSG habitat with appropriate USFWS and state agency personnel.

## **Appendix D – Wildfire and Invasive Species Assessments/FIAT Team**

## **UTAH**

### **Wildland Fire Management**

BLM planning units, in collaboration with the USFWS and relevant state agencies, would complete and maintain **GRSG Landscape Wildfire & Invasive Species Habitat Assessments** to prioritize at risk habitats, and identify fuels management, preparedness, suppression and restoration priorities necessary to maintain sagebrush habitat to support interconnecting GRSG populations. These assessments and subsequent assessment updates would also be a collaborative effort with an interdisciplinary team to take into account other GRSG priorities identified in this plan. **Appendix M, Draft Greater Sage-Grouse Wildland Fire and Invasive Species Assessment**, describes a minimal framework example and suggested approach for this assessment.

Implementation actions will be tiered to the local **GRSG Landscape Wildfire & Invasive Species Assessment**, using best available science related to the conservation of GRSG.

In collaboration with USFWS and relevant state agencies, BLM planning units would identify annual treatment needs for wildfire and invasive species management as identified in local unit level **Landscape Wildfire and Invasive Species Assessments**. Annual treatment needs would be coordinated across state/regional scales and across jurisdictional boundaries for long-term conservation of GRSG.

Annually complete a review of **landscape assessment implementation** efforts with appropriate USFWS and state agency personnel.

### **Fuels Management**

In PPMA, fuel treatments will be designed through an interdisciplinary process to expand, enhance, maintain, or protect GRSG habitat.

- In collaboration with USFWS and relevant state agencies, BLM planning units with large blocks of GRSG habitat will develop, **using the assessment process described in Appendix M**, a fuels management strategy which considers an up-to-date fuels profile, LUP direction, current and potential habitat fragmentation, sagebrush and GRSG ecological factors, and active vegetation management steps to provide critical breaks in fuel continuity, where appropriate. When developing this strategy, planning units will consider the risk of increased habitat fragmentation from a proposed action versus the risk of large scale fragmentation posed by wildfires if the action is not taken.

Within GRSG habitat, PPMA are the highest priority for conservation and protection during fire operations and fuels management decision making. PPMA will be viewed as more valuable than PGMA when priorities are established. When suppression resources are widely available, maximum efforts will be placed on limiting fire growth in PGMA polygons as well. These priority areas will be further refined following completion of the **GRSG Landscape Wildfire & Invasive Species Habitat Assessments described in Appendix M**.

## **OREGON**

### Vegetation

Goal VG - 2: Increase the resistance of Greater Sage-grouse habitat to invasive annual grasses and the resiliency of Greater sage-grouse habitat to disturbances such as fire, and to climate change to reduce habitat loss and fragmentation.

Objective VG – X: Reduce juniper cover within 1 mile of all occupied and pending leks to zero within 10 years and to less than 5% within 4 miles of such leks within 20 years.

Objective VG - X: Reduce the area dominated by invasive annual grasses to no more than 5% within 4 miles of all occupied and pending leks within 20 years. Manage vegetation to retain resistance to invasion where invasive annual grasses dominate less than 5% of the area within 4 miles of such leks.

Objective VG - X: A minimum of 70% of the area capable of supporting sagebrush plant communities within each PAC has sagebrush cover of at least 5%. Use ecological site descriptions to determine which sites are capable of supporting sagebrush plant communities.

Objective VG - X: Coordinate vegetation management activities with adjoining landowners even where the boundary is greater than 4 miles from an occupied or pending lek.

Action VG - 1: Priority areas for GRSG habitat restoration and maintenance projects are:

- Sites with a higher probability of success.
- Seasonal habitats thought to be limiting to GRSG populations.

- Connectivity corridors between GRSG populations and subpopulations.
- Following stand-replacing events at least 100 acres in size.

\*Not in priority order\*

Action VG – X: Within 4 miles of occupied or pending leks, priority order for juniper treatment are:

1. Phase I and II juniper.
2. Phase III juniper with a grass-forb understory.

Action VG – X: In priority treatment areas for invasive annual grasses, apply early detection-rapid response principles on:

- New infestations.
- Satellite populations.
- Isolated populations.
- Where invasive annual grasses are still sub-dominant.
- Edges of large infestations
- Where sites are frequently or commonly used for temporary infrastructure such as incident base camps, spike camps, staging areas, and helispots.

\*Not in priority order\*

## Wildfire

Action WFM – X: Complete an interagency landscape-scale assessment (Appendix XX (H)) to prioritize at-risk habitats and identify fuels management, preparedness, suppression, and restoration priorities. Update these assessments ~~every 5 years or~~ as necessary or following a major disturbance event.

Action WFM - 29: Develop a system of fuel breaks to protect larger intact blocks of GRSG habitat. Locate these fuel breaks along existing roads and ROWs, where possible. **[Within GRSG habitat, prioritize suppression and fuels management activities based on an assessment of the quality of habitat at risk.]**

Action WFM - X: Develop annual treatment and fire management programs in coordination with interagency partners and across jurisdictional boundaries based on priorities identified in the local District Landscape Wildfire & Invasive Species Assessment.

Action WFM - X: Complete an annual review of landscape assessment implementation efforts with interagency partners.

**Brent Ralston**

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**From:** phallman@blm.gov on behalf of SOEmail, BLM\_ID  
**Sent:** Monday, July 21, 2014 3:53 PM  
**To:** Jeffery Foss; Kurt Wiedenmann; Sylvia Graves; Eric Mayes; Steven Jirik; Brent Ralston; Terrian Wells; Michael Morcom; Henry, Susanna M; Glen Burkhardt  
**Subject:** Fwd: IM 2014-114, Sage-Grouse Habitat and Wildland Fire Management

This IM was sent to All Field Office Officials.

This Instruction Memorandum (IM) establishes Bureau of Land Management (BLM) guidance for management actions in renewable resource programs, fuels management, fire operations, and emergency stabilization and rehabilitation (ESR) related to habitat protection, conservation, and restoration for all species of sage-grouse (Gunnison and Greater Sage-grouse, including the Bi-State and Columbia Basin distinct population sub-groups).

See the link in the forwarded message.

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**From:** Directives\_Washington, BLM\_WO <[blm\\_wo\\_directives\\_washington@blm.gov](mailto:blm_wo_directives_washington@blm.gov)>  
**Date:** Fri, Jul 18, 2014 at 3:00 PM  
**Subject:** IM 2014-114, Sage-Grouse Habitat and Wildland Fire Management  
**To:** BLM\_States <[blm\\_states@blm.gov](mailto:blm_states@blm.gov)>  
**Cc:** Dea Tovar <[dtovar@blm.gov](mailto:dtovar@blm.gov)>, Lynn Jackson <[ljackson@blm.gov](mailto:ljackson@blm.gov)>, Maylyne Weisenburger <[mweisenb@blm.gov](mailto:mweisenb@blm.gov)>, Kristine King <[kiking@blm.gov](mailto:kiking@blm.gov)>, Joe Freeland <[jfreeland@blm.gov](mailto:jfreeland@blm.gov)>, Beth Gustas <[bgustas@blm.gov](mailto:bgustas@blm.gov)>, Randolph Hayes <[r30hayes@blm.gov](mailto:r30hayes@blm.gov)>, Ronald Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Krista Gollnick <[kgollnick@blm.gov](mailto:kgollnick@blm.gov)>

Good Afternoon to All

The updated version of this IM is now online at:

[http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2014/IM\\_2014-114.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2014/IM_2014-114.html)

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## Brent Ralston

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**From:** Wiedenmann, Kurt  
**Sent:** Monday, July 21, 2014 3:17 PM  
**To:** Brent Ralston; Paul Makela; Steven Jirik; Joseph Adamski; Christopher Robbins; Dominika Lepak; Anne Halford  
**Subject:** Fwd: IM 2014-114, Sage-Grouse Habitat and Wildland Fire Management

fyi

### Kurt Wiedenmann

Resources and Science Branch Chief  
BLM - Idaho State Office  
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**From:** SOEmail, BLM\_ID <[blm\\_id\\_soemail@blm.gov](mailto:blm_id_soemail@blm.gov)>  
**Date:** Fri, Jul 18, 2014 at 2:23 PM  
**Subject:** Fwd: IM 2014-114, Sage-Grouse Habitat and Wildland Fire Management  
**To:** Sylvia Graves <[sgraves@blm.gov](mailto:sgraves@blm.gov)>, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Kurt Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, Terrian Wells <[twells@blm.gov](mailto:twells@blm.gov)>, Paul Makela <[pmakela@blm.gov](mailto:pmakela@blm.gov)>, Michael Morcom <[mmorcom@blm.gov](mailto:mmorcom@blm.gov)>, "Henry, Susanna M" <[shenry@blm.gov](mailto:shenry@blm.gov)>, Thomas Hayes <[thayes@blm.gov](mailto:thayes@blm.gov)>

This IM is addressed to All Field Office Officials. Resources and Sciences and Fire and Aviation share the lead.

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**From:** Directives\_Washington, BLM\_WO <[blm\\_wo\\_directives\\_washington@blm.gov](mailto:blm_wo_directives_washington@blm.gov)>  
**Date:** Fri, Jul 18, 2014 at 2:14 PM  
**Subject:** IM 2014-114, Sage-Grouse Habitat and Wildland Fire Management  
**To:** BLM\_States <[blm\\_states@blm.gov](mailto:blm_states@blm.gov)>  
**Cc:** Dea Tovar <[dtovar@blm.gov](mailto:dtovar@blm.gov)>, Lynn Jackson <[ljackson@blm.gov](mailto:ljackson@blm.gov)>, Kristine King <[kiking@blm.gov](mailto:kiking@blm.gov)>, Maylyne Weisenburger <[mweisenb@blm.gov](mailto:mweisenb@blm.gov)>, Derrick Henry <[djhenry@blm.gov](mailto:djhenry@blm.gov)>, Ronald Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Krista Gollnick <[kgollnick@blm.gov](mailto:kgollnick@blm.gov)>, Joe Freeland <[jfreeland@blm.gov](mailto:jfreeland@blm.gov)>

Good Afternoon to All

IM 2014-114, is now online at:

<http://web.blm.gov/internal/wo-500/directives/dir-14/im2014-114.html>

**Purpose:** This Instruction Memorandum (IM) establishes Bureau of Land Management (BLM) guidance for management actions in renewable resource programs, fuels management, fire operations, and emergency stabilization and rehabilitation (ESR) related to habitat protection, conservation, and restoration for all species of sage-grouse (Gunnison and Greater Sage-grouse, including the Bi-State and Columbia Basin distinct population sub-groups).



UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240  
<http://www.blm.gov/>

July 18, 2014

In Reply Refer To:  
6711/9217 (FA-100) PEMS TRANSMISSION 07/18/2014  
Instruction Memorandum No. WO IM-2014-114  
Expires: 09/30/2015

To: All Field Office Officials

From: Deputy Director for Operations

Subject: Sage-Grouse Habitat and Wildland Fire Management

**Program Areas:** All Renewable Resource and Fire Management Programs**Purpose:** This Instruction Memorandum (IM) establishes Bureau of Land Management (BLM) guidance for management actions in renewable resource programs, fuels management, fire operations, and emergency stabilization and rehabilitation (ESR) related to habitat protection, conservation, and restoration for all species of sage-grouse (Gunnison and Greater Sage-grouse, including the Bi-State and Columbia Basin distinct population sub-groups).**Policy/Action:** This IM reinforces and enhances Washington Office (WO) IM No. 2013-128 (May 23, 2013), Fire and Aviation IM No. 2012-017 (May 14, 2012), and WO-IM No. 2012-043 (December 22, 2011). This direction is in addition to and does not replace more protective measures in existing land use plans (LUPs).

Firefighter and public safety has been, and continues to be, the BLM's highest fire management priority. The management of fire and hazardous fuels in protecting and enhancing sage-grouse habitat is one of the factors that will be considered by the U.S. Fish and Wildlife Service in making a decision regarding whether the Greater Sage-Grouse warrants protection under the Endangered Species Act. Over 50 percent of sage-grouse habitat is located on public lands managed by the BLM. Protecting, conserving, and restoring sage-grouse habitat is BLM fire management's highest natural resource objective.

Wildfire and invasive plants are range-wide threats to sage-grouse habitat and are the primary threats to the sage-grouse populations in the Great Basin. The BLM's management responsibilities include taking actions on public lands to control and manage wildfire and invasive plants in order to protect, conserve, and restore sage-grouse habitat. The BLM's goal is to limit acres burned and damaged within and adjacent to sage-grouse habitat. The BLM will meet this goal through the certain management actions, including those involving renewable resource authorizations, fuels management, fire operations, and emergency stabilization prioritization. Rapid restoration of sage-grouse habitat has proven difficult, requiring the BLM to focus on its pre-fire, fire suppression, and post fire efforts. The BLM will place a high priority on treatments that will aid fire suppression and reduce fire threats within and adjacent to sage-grouse habitat. The following provides guidance to convey leader's intent while recognizing that not all of these actions and activities apply to all affected offices and successful implementation may look different throughout the BLM.

Prior to, during, and following wildland fires, BLM field offices will:

- Protect, conserve, and restore sage-grouse habitat.
- Strive to maintain and enhance resilience of sage-grouse habitat.
- Foster existing relationships with partners and develop new cooperative relationships that will help bolster BLM capacity to protect sage grouse habitat.

With regard to fire operations in sage grouse habitat, BLM field offices will:

- Prioritize firefighter and public safety including following our "Standard Firefighting Orders", mitigate any "Watch-Out Situations", and apply the principles of Lookouts, Communications, Escape Routes, and Safety Zones on all fire assignments.
- Maintain a strong and proactive preparedness capability when conditions indicate potential for multiple ignitions and large fire growth.
- Maintain situational awareness during suppression resource drawdown levels under multiple ignition and large fire growth conditions.
- Boost suppression capability in critical sage grouse habitat when severe fire weather conditions are predicted.
- Generate interest in local residents and public land users becoming a trained and equipped fire response force to work in concert with existing partners.
- Expand the use of Rangeland Fire Protection Association (RFPA) or Volunteer Fire Department (VFD) suppression resources.
- Continue and expand efforts to train and use local, non-federal agency individuals as liaisons in wildland fire detection and suppression operations.

With regard to Renewable Resources Programs, Fuels, Healthy Lands Initiative (HLI), and Emergency Stabilization &amp; Rehabilitation (ES&amp;R), BLM field offices will:

- Consider establishing fuel breaks, such as mowing, tilling, green-stripping, and planting of fire resistant plant species in strategic locations to help protect areas with sagebrush cover.
- Coordinate with State/County/Municipal highway and road departments on road right-of-way maintenance programs to reduce fuel loads and the size and spread of wildfire.
- Coordinate with partners including state, federal and private landowners to design and implement fuels treatments that will minimize fire growth and size.
- Consider reducing the cover of pinyon pine and juniper where it is encroaching on sage-grouse habitat.
- Apply Integrated Vegetation Management (IVM) practices in addressing invasive and non-native species, including cheatgrass treatments and sagebrush management.
- Increase sagebrush, perennial grass and forb cover.

- Protect soil from erosion following disturbance through planting and seeding efforts.
  - § Strive to retain residual and functional post-fire plant species including early seral native perennial grasses.
  - § Favor fire-resistant native or non-native plant species when necessary as a first step toward habitat recovery.
  - § Use locally adapted native seed where available and probability of success and funding allow.
  - § Consider using minimum till drills and multiple seed boxes, where practical and available, to increase seeding success.
- Coordinate funding and planning within fuels, ESR, and renewable resources programs to plan and implement treatments that meet landscape objectives. This may include side-by-side treatments, and utilizing partner funds to cover additions to ESR seed mixes that will conserve and restore sage-grouse habitat.

The Fire Planning and Fuels Management Division (FA-600) hosts the webpage containing updated maps, instruction memoranda, conservation measures, best management practices, and spatial data pertaining to sage-grouse for the fire and fuels management functions. These resources can be accessed at: <http://web.blm.gov/internal/fire/fpfm/sg/index.html>. Using locally-developed data to supplement these resources is encouraged.

**Timeframe:** This IM is effective immediately.

**Budget Impact:** Costs will remain consistent with current budgets. States and offices without sage-grouse habitat may receive less than their usual allocation in some program areas to help achieve these objectives.

**Manual/Handbook Sections Affected:** This IM complements WO IM No. 2013-128, FA IM No. 2012-017, and WO IM No. 2012-043.

**Coordination:** This IM has been coordinated between Fire and Aviation (FA100) and Resources and Planning (WO200).

**Contact:** Questions may be directed to Ron Dunton, Acting Assistant Director, Office of Fire and Aviation, 208-387-5447, or Edwin Roberson, Assistant Director, Resources and Planning, 202-208-4896. Technical contacts are Stephen Small, Division Chief for Fish and Wildlife Conservation at (202) 912-7366 and Krista Gollnick-Waid, Fire Planning and Fuels Management Division at (208) 387-5165.

Signed by:  
Steven A. Ellis  
Deputy Director, Operations

Authenticated by:  
Robert M. Williams  
Division of IRM Governance,WO-860

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## Appendix A – Required Design Features and Best Management Practices

The following required design features (RDFs) and best management practices (BMPs) are included for consideration and use based upon review of current science and effects analysis (circa 2014) (Table A-1). These made be reviewed and updated through plan maintenance as new information and updated scientific findings become available.

The table is organized by program area grouping the RDFs and BMPs most relevant to that program; however, all relevant RDFs and BMPs, regardless of which program they are grouped under, should be considered during project evaluation and applicable RDFs and BMPs should be applied during implementation. The table identifies the specific measure (numbered) and its appropriate application – as an RDF – required all the time everywhere; as a BMP required when the applicable resources are present; and as a BMP when appropriate and application would reduce impacts and not conflict with other RDFs or BMPs. In some cases the BMPs may not all be appropriate based on local conditions and would be assessed in the appropriate site specific NEPA analysis, these all should be considered and were determined to be beneficial to achieving GRSG habitat objectives included as part of the site specific project. In other cases additional project design criteria or best management practices could be incorporated into project implementation to address site specific concerns not fully addressed by the RDFs or BMPs described here.

**Table A-1. Required Design Features and Best Management Practices**

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
<b>General</b>			
1. Solicit and consider expertise and ideas from local landowners, working groups, and other federal, state, county, and private organizations during development of projects.			X
<b>Wildfire Suppression</b>			
2. Compile district-level information into state-wide sage-grouse tool boxes. Tool boxes will contain maps, listing of resource advisors, contact information, local guidance, and other relevant information for each district, which will be aggregated into a state-wide document.	X		
3. Provide localized maps to dispatch offices and extended attack incident commanders for use in prioritizing wildfire suppression resources and designing suppression tactics. The Fire Planning and Fuels Management Division (FA-600) hosts a webpage containing up-to-date maps, instruction memoranda, conservation measures, BMPs, and spatial data specific to fire operations and fuels management/sage-grouse interactions. These resources can be accessed at: <a href="http://web.blm.gov/internal/fire/fpfm/sg/index.html">http://web.blm.gov/internal/fire/fpfm/sg/index.html</a> . Additional BLM sage-grouse information can be	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
found at: <a href="http://www.blm.gov/wo/st/en/prog/more/fish_wildlife_and/sage-grouse-conservation.html">http://www.blm.gov/wo/st/en/prog/more/fish_wildlife_and/sage-grouse-conservation.html</a> .			
4. Assign a resource advisor with sage-grouse expertise, or who has access to sage-grouse expertise, to all extended attack fires in or near sage-grouse habitat areas. Prior to the fire season, provide training to sage-grouse resource advisors on wildfire suppression organization, objectives, tactics, and procedures to develop a cadre of qualified individuals. Involve state wildlife agency expertise in fire operations through: <ul style="list-style-type: none"> <li>• instructing resource advisors during preseason trainings;</li> <li>• qualification as resource advisors;</li> <li>• coordination with resource advisors during fire incidents;</li> <li>• contributing to incident planning with information such as habitat features or other key data useful in fire decision making</li> </ul>	X		
5. At the onset of an emerging wildland fire the Agency Administrators and Fire Management Officers will engage a local Resource Advisor to assess sage-grouse habitat that may be affected by the fire or suppression activities.	X		
6. If complexity of the wildland fire warrants the activation of an Incident Management Team, locally refined information regarding important sage-grouse habitat will be relayed during in brief and continually throughout the incident.		X	
7. On critical fire weather days, pre-position additional fire suppression resources to optimize a quick and efficient response in sage-grouse habitat areas.		X	
8. As appropriate, utilize existing fuel breaks, such as roads or discrete changes in fuel type, as control lines in order to minimize fire spread.		X	
9. During periods of multiple fires, ensure line officers are involved in setting priorities.	X		
10. To the extent possible, locate wildfire suppression facilities (i.e., base camps, spike camps, drop points, staging areas, heli-bases, etc.) in areas where physical disturbance to sage-grouse habitat can be minimized. These include disturbed areas, grasslands, near roads/trails or in other areas where there is existing disturbance or minimal sagebrush cover.	X		
11. Power-wash all firefighting vehicles, to the extent possible, including engines, water tenders, personnel vehicles, and all-terrain vehicles (ATV) prior to deploying in or near sage-grouse habitat areas to minimize noxious weed spread.	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
12. Minimize cross-country vehicle travel during fire operations in sage-grouse habitat.	X		
13. Minimize burnout operations in key sage-grouse habitat areas by constructing direct fireline whenever safe and practical to do so.	X		
14. Utilize retardant, mechanized equipment, and other available resources to minimize burned acreage during initial attack.	X		
15. As safety allows, conduct mop-up where the black adjoins unburned islands, dog legs, or other habitat features to minimize sagebrush loss.		X	
16. Adequately document fire operation activities in sage-grouse habitat for potential follow-up coordination activities.	X		
<b>Fuels Management</b> Unless otherwise specified as part of the land use plan consider the full array of fuels management treatment types (prescribed fire, mechanical, chemical and biological) when implementing the following RDFs and BMP's.			
17. Where applicable, design fuels treatment objectives to protect existing sagebrush ecosystems, modify fire behavior, restore native plants, and create landscape patterns which most benefit sage-grouse habitat.	X		
18. Provide training to fuels treatment personnel on sage-grouse biology, habitat requirements, and identification of areas utilized locally.	X		
19. Use burning prescriptions which minimize undesirable effects on vegetation or soils (e.g., minimize mortality of desirable perennial plant species and reduce risk of annual grass invasion).	X		
20. Ensure proposed sagebrush treatments are planned with full interdisciplinary input pursuant to NEPA and coordination with state fish and wildlife agencies, and that treatment acreage is conservative in the context of surrounding sage-grouse seasonal habitats and landscape.	X		
21. Where appropriate, ensure that treatments are configured in a manner that promotes use by sage-grouse.	X		
22. Where applicable, incorporate roads and natural fuel breaks into fuel break design.		X	
23. Power-wash all vehicles and equipment involved in fuels management activities, prior to entering the area, to minimize the introduction of undesirable and/or invasive plant species.	X		
24. Design vegetation treatments in areas of high fire frequency which facilitate firefighter safety, reduce the potential acres burned, and reduce the fire risk to sage-grouse habitat. Additionally, develop maps for sage-grouse habitat which spatially display existing fuels treatments that can be used to assist suppression	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
activities.			
25. Give priority for implementing specific sage-grouse habitat restoration projects in annual grasslands, first to sites which are adjacent to or surrounded by Core Management Zones or that reestablish continuity between Core Management Zones. Annual grasslands are a second priority for restoration when the sites are not adjacent to Core Management Zones, but within Important Management Zones. The third priority for annual grassland habitat restoration projects are sites within General Management Zones. The intent is to focus restoration outward from existing, intact habitat.	X		
26. As funding and logistics permit, restore annual grasslands to a species composition characterized by perennial grasses, forbs, and shrubs or one of that referenced in land use planning documentation.	X		
27. Emphasize the use of native plant species, especially those from a warmer area of the species' current range, recognizing that non-native species may be necessary depending on the availability of native seed and prevailing site conditions.	X		
28. Remove standing and encroaching trees within at least 110 yards of occupied sage-grouse leks and other habitats (e.g., nesting, wintering and brood rearing) to reduce the availability of perch sites for avian predators, as resources permit.		X	
29. Protect wildland areas from wildfire originating on private lands, infrastructure corridors, and recreational areas.		X	
30. Reduce the risk of vehicle- or human-caused wildfires and the spread of invasive species by installing fuel breaks and/or planting perennial vegetation (e.g., green-strips) paralleling road rights-of-way.			X
31. Strategically place and maintain pre-treated strips/areas (e.g., mowing, herbicide application, etc.) to aid in controlling wildfire, should wildfire occur near CMZ or priority restoration areas (such as where investments in restoration have already been made).	X		
32. Design treatments to provide a break in fuel continuity in large, at-risk, expanses of continuous sagebrush. Use local knowledge of fire occurrence, spread patterns, and habitat values at risk to determine the proper placement and size of the fuel break.	X		
33. Use existing agreements with local, county, and state road departments to improve and maintain existing fuel breaks during routine road maintenance. Examples include: blading, mowing, disking, grading, and spraying roadside vegetation.		X	
34. Form partnerships with linear right-of-way holders to		X	

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
maintain fuel breaks, which reduce fuel continuity and serve to protect at-risk landscapes.			
35. Use existing NEPA documentation and authorities, where possible, when conducting road right-of-way maintenance. In many instances, existing authorizations for roads or linear rights-of-way contain provisions for maintenance activities that could be implemented and incorporated into a vegetation and habitat protection strategy without requiring additional NEPA analysis. Document this with a Determination of NEPA Adequacy (DNA).			X
36. Enter into agreements with road departments which may help fund the construction and maintenance of fuel breaks adjacent to roads, as funding permits.		X	
37. Spatially depict the locations of existing and planned fuel breaks in a landscape fuel break map and label each vegetation polygon for reference. Offices will make these maps available to suppression resources for use in fire operations.	X		
<b>Vegetation Treatment</b>			
38. Utilize available plant species based on their adaptation to the site when developing seed mixes. (Lambert 2005; VegSpec).	X		
39. Utilizing the warmer component of a species' current range when selecting native species for restoration when available (Kramer and Havens 2009).		X	
40. Reduce annual grass densities and competition through herbicide, targeted grazing, tillage, prescribed fire, etc. (Pyke 2011).			X
41. Reduce density and competition of introduced perennial grasses using appropriate techniques to accomplish this reduction (Pellant and Lysne 2005).			X
42. Utilize techniques to introduce desired species to the site such as drill seeding, broadcast seeding followed by a seed coverage technique, such as harrowing, chaining or livestock trampling, and transplanting container or bare-root seedlings.			X
43. Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.		X	
44. Use site preparation techniques that retain existing desirable vegetation.	X		
45. Use "mother plant" techniques or planting of satellite populations of desirable plants to serve as seed sources.		X	
46. Utilize post-treatment control of annual grass and other invasive species.	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
47. Utilize new tools and use of new science and research as it becomes available.	X		
48. Give higher priority to vegetation rehabilitation or manipulation projects that include: <ul style="list-style-type: none"> <li>• Sites where environmental variables contribute to improved chances for project success (Meinke et al. 2009).</li> <li>• Areas where seasonal habitat is limiting GRSG distribution and/or abundance (wintering areas, wet meadows and riparian areas, nesting areas, leks, etc.).</li> <li>• Re-establish sagebrush cover in otherwise suitable GRSG with consideration to local needs and conditions using the general priorities in the following order:                             <ul style="list-style-type: none"> <li>• Recently burned native areas</li> <li>• Native grassland with suitable forb component</li> <li>• Nonnative grassland with suitable forb component</li> <li>• Recently converted annual grass areas</li> <li>• Native grassland</li> <li>• Nonnative grassland</li> </ul> </li> <li>• Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial or other techniques to re-establish them. Examples include but are not limited to, use of a Lawson aerator with seeding, harrow or chain with seeding, drill seeding, hand planting plugs, aerial seeding or other appropriate technique.</li> <li>• Cooperative efforts that may improve GRSG habitat quality over multiple ownerships.</li> <li>• Projects that may provide connectivity between suitable habitats or expand existing good quality habitats.</li> <li>• Projects that address conifer encroachment into important GRSG habitats. In general the priority for treatment is 1) Phase 1 (<math>\leq 10\%</math> conifer cover), 2) Phase 2 (10-30%), and 3) Phase 3 (<math>&gt; 30\%</math>).</li> <li>• Replacing stands of annual grasses within otherwise good quality habitats with desirable perennial species. Other factors that contribute to the importance of the restoration project in maintaining or improving GRSG habitat.</li> </ul>	X		
Lands and Realty			



Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
49. Where technically and financially feasible, bury distribution powerlines and communication lines within existing disturbance.		X	
50. Above-ground disturbance areas would be seeded with perennial vegetation as per vegetation management.	X		
51. Place infrastructure in already disturbed locations where the habitat has not been fully restored.		X	
52. Cluster disturbances, operations (fracturing stimulation, liquids gathering, etc.) and facilities as close as possible.		X	
53. Co-locate linear facilities within one mile of existing linear facilities.		X	
54. Micro-site linear facilities to reduce impacts to sage-grouse habitats.	X		
55. Locate staging areas outside the Core Management Zones to the extent possible.	X		
56. Consider collocating powerlines, flowlines and pipelines under or immediately adjacent to a road or adjacent to other pipelines first, before considering collocating with other ROW.			X
57. Restrict the construction of tall facilities and fences to the minimum number and amount needed.	X		
58. Use free standing structures where possible, to limit the use of guy wires. Where guy wires are necessary and appropriate bird collision diverters would be used, if doing so would not cause a human safety risk.	X		
59. Place new utility developments (power lines, pipelines, etc.) and transportation routes in existing utility or transportation corridors.		X	
60. Construction and development activities should conform to seasonal restrictions.	X		
<b>Fluid Mineral Leasing</b>			
61. Use directional drilling and/or multi well-pads to reduce surface disturbance.	X		
62. Apply a phased development approach with concurrent reclamation.	X		
63. Place liquid gathering facilities outside of CMZs. Have no tanks at well locations within CMZs to minimize truck traffic and perching and nesting sites for ravens and raptors.	X		
64. Use remote monitoring techniques for production facilities and develop a plan to reduce the frequency of vehicle use (Lyon and Anderson 2003).			X
65. Site and/or minimize linear ROWs or SUAs to reduce disturbance to sagebrush habitats.	X		
66. Design or site permanent structures which create movement (e.g. pump jack) to minimize impacts to GRSG.	X		
67. Equip tanks and other above-ground facilities with		X	

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
structures or devices that discourage nesting of raptors and corvids.			
68. Control the spread and effects of non-native plant species (Gelbard and Belnap 2003, Bergquist et al. 2007, Evangelista et al. 2011). (E.g. by washing vehicles and equipment.)		X	
69. Restrict pit and impoundment construction to reduce or eliminate threats from West Nile virus (Doherty 2007).		X	
<p>70. Remove or re-inject produced water to reduce habitat for mosquitoes that vector West Nile virus. If surface disposal of produced water continues, use the following steps for reservoir design to limit favorable mosquito habitat:</p> <ul style="list-style-type: none"> <li>• Overbuild size of ponds for muddy and non-vegetated shorelines.</li> <li>• Build steep shorelines to decrease vegetation and increase wave actions.</li> <li>• Avoid flooding terrestrial vegetation in flat terrain or low lying areas.</li> <li>• Construct dams or impoundments that restrict down slope seepage or overflow.</li> <li>• Line the channel where discharge water flows into the pond with crushed rock.</li> <li>• Construct spillway with steep sides and line it with crushed rock.</li> <li>• Treat waters with larvicides to reduce mosquito production where water occurs on the surface</li> </ul>		X	
71. In CMZ, limit noise from discretionary activities to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season.	X		
72. Require noise shields when drilling during the lek, nesting, brood-rearing, or wintering season.			X
73. The BLM/Forest Service would work with proponents to limit project related noise where it would be expected to reduce functionality of habitats in Core and Important Management Zones.	X		
74. The BLM/Forest Service would evaluate the potential for limitation of new noise sources on a case-by-case basis as appropriate.	X		
75. Limit noise sources that would be expected to negatively impact populations in Core and Important Management Zones and continue to support the establishment of ambient baseline noise levels for occupied leks in Core Management Zones.	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
76. As additional research and information emerges, specific new limitations appropriate to the type of projects being considered would be evaluated and appropriate limitations would be implemented where necessary to minimize potential for noise impacts on sage-grouse core population behavioral cycles.	X		
77. As new research is completed, new specific limitations would be coordinated with the IDFG and MT FWP and partners.	X		
78. Fit transmission towers with anti-perch devices (Lammers and Collopy 2007).			X
79. Require sage-grouse-safe fences.			X
80. Locate new compressor stations outside Core Management Zones and design them to reduce noise that may be directed towards Core Management Zones.	X		
81. Clean up refuse (Bui et al. 2011).	X		
82. Locate man camps outside of priority sage-grouse habitats.	X		
83. Consider using oak (or other material) mats for drilling activities to reduce vegetation disturbance and for roads between closely spaced wells to reduce soil compaction and maintain soil structure to increase likelihood of vegetation reestablishment following drilling.			X
84. Use only closed-loop systems for drilling operations and no reserve pits.	X		
85. Cover (e.g., fine mesh netting or use other effective techniques) all drilling and production pits and tanks regardless of size to reduce sage-grouse mortality.	X		
<b>Roads</b>			
86. Utilize existing roads, or realignments of existing routes to the extent possible.	X		
87. Design roads to an appropriate standard no higher than necessary to accommodate their intended purpose.	X		
88. Do not issue ROWs or SUAs to counties on newly constructed energy or mineral development roads, unless for a temporary use consistent with all other terms and conditions included in this document.	X		
89. Establish speed limits on BLM and FS system roads to reduce vehicle/wildlife collisions or design roads to be driven at slower speeds.			X
90. Coordinate road construction and use among ROW or SUA holders.	X		
91. Construct road crossings at right angles to ephemeral drainages and stream crossings.			X
92. Use dust abatement on roads and pads.	X		
93. Close and reclaim duplicate roads by restoring original landform and establishing desired vegetation.		X	

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
<b>Roads Specific to Core and Important Management Zones</b>			
94. Locate roads to avoid priority areas and habitats as described in the Wildfire and Invasive Species Assessments.	X		
95. Establish trip restrictions (Lyon and Anderson 2003) or minimization through use of telemetry and remote well control (e.g., Supervisory Control and Data Acquisition).	X		
96. Restrict vehicle traffic to only authorized users on newly constructed routes (using signage, gates, etc.)	X		
<b>Reclamation Activities</b>			
97. Include objectives for ensuring habitat restoration to meet sage-grouse habitat needs in reclamation practices/sites (Pyke 2011).	X		
98. Address post reclamation management in reclamation plan such that goals and objectives are to protect and improve sage-grouse habitat needs.		X	
99. Maximize the area of interim reclamation on long-term access roads and well pads, including reshaping, topsoiling and revegetating cut-and-fill slopes.	X		
100. Restore disturbed areas at final reclamation to the pre-disturbance landforms and desired plant community.	X		
101. Irrigate interim reclamation if necessary for establishing seedlings more quickly.		X	
102. Utilize mulching techniques to expedite reclamation and to protect soils.		X	
<b>Grazing Required Design Features</b>			
103. Avoid building new wire fences within 2 km of occupied leks (Stevens 2011). If this is not feasible, ensure that high risk segments are marked with collision diverter devices or as latest science indicates.	X		
104. Place new, taller structures, including corrals, loading facilities, water storage tanks, windmills, out of line of sight or at least one kilometer (preferably 3 km) from occupied leks, where such structures would increase the risk of avian predation.	X		
105. Utilize temporary fencing (e.g., ESR, drop down fencing) where feasible and appropriate to meet management objectives.		X	
106. Fence wetlands (e.g., springs, seeps, wet meadows and/or riparian areas) where appropriate, to maintain or foster progress toward Proper Functioning Condition and to facilitate management of sage-grouse habitat objectives. Where constructing fences or exclosures to improve riparian and/or upland management, incorporate fence marking or other BMPs/RDFs as appropriate.		X	
107. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations)	X		

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
and March 25-May 15 in higher elevations), livestock trailing will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6:00 p.m. and 9:00 a.m. to avoid disturbance to lekking and roosting sage-grouse. Over-nighting, watering and sheep bedding locations on public lands must be at least 1 km from occupied leks during the lekking season to reduce disturbance from sheep, human activity and guard animals.			
108. Work with permittees in locating sheep over-nighting, watering and sheep bedding locations to minimize impacts to sage-grouse seasonal habitats.	X		
109. When trailing livestock during the lekking or nesting season, use roads or existing trails, to the extent possible to reduce disturbance to roosting, lekking or nesting sage-grouse.		X	
110. Design new spring developments in GRS habitat to maintain or enhance the free flowing characteristics of springs and wet meadows. Modify developed springs, seeps and associated pipelines to maintain the continuity of the predevelopment riparian area within priority GRS habitat where necessary.		X	
111. Install ramps in new and existing livestock troughs and open water storage tanks to facilitate the use of and escape from troughs by GRS and other wildlife.		X	
<b>West Nile Virus Required Design Features</b>			
112. Construct water return features and maintain functioning float valves to prohibit water from being spilled on the ground surrounding the trough and/or tank and return water to the original water source, to the extent practicable.	X		
113. Minimize the construction of new ponds or reservoirs except as needed to meet important resource management and/or restoration objectives.	X		
114. Develop and maintain non-pond/reservoir watering facilities, such as troughs and bottomless tanks, to provide livestock water.	X		
115. For most spring developments or wells, mosquito breeding habitat usually is not an issue. Flowing cold (less than 50° Fahrenheit) water and steep sides of the stock tanks are not conducive for egg laying or larvae production. If flows are low, the water is warm, or moss production is an issue in the tank, mosquito breeding habitat could exist in the tank.	X		
116. Maintenance of healthy wetlands at spring sources helps control mosquitoes and their larvae by providing habitat for natural predators such as birds, dragonflies and amphibians. Protecting the wetland at the spring source with a fence is an option to consider.			X

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
117. Clean and drain stock tanks before the season starts. If never cleaned or drained, many tanks will fill with silt or debris causing warmer water and heavy vegetation growth conducive to mosquito reproduction.		X	
118. Draining tanks after the period of use is completed, particularly in warmer weather, also reduces potential habitat by eliminating stagnant standing water.		X	
119. Maintain a properly functioning overflow to prevent water from flowing onto the pad and surrounding area, to eliminate or minimize pooling of water that is attractive to breeding mosquitoes.	X		
120. Clean or deepen overflow ponds to maintain colder temperatures to reduce mosquito habitat.		X	
121. Install and maintain float valves on stock tank fill pipes to minimize overflow	X		
122. Harden stock tank pads to reduce tracks that can potentially hold water where mosquitoes may breed.	X		
123. Build ponds with steep shorelines to reduce shallow water (>60 cm) and aquatic vegetation around the perimeter of impoundments to deter colonizing by mosquitos (Knight et al. 2003, cited in NTT report page 61).	X		
124. Consider removing and controlling trees and shrubs to reduce shade and wind barriers on pit and reservoir shorelines if not needed for wildlife, fish, or recreational values.			X
125. Impoundments that remain accessible to livestock and wildlife can cause tracking and nutrient enrichment from manure which can create favorable mosquito breeding habitat. Where this is a concern, it may be desirable to fence the reservoir and pipe the water to a tank.			X
126. Construct dams or impoundments that minimize down-slope seepage or overflow. Seepage and overflow results in down-grade accumulation of vegetated shallow water areas that support breeding mosquitoes.		X	
127. On ponds and reservoirs with enough depth and volume, introduce native fish species, which feed on mosquito larvae.			X
128. Line the overflow of a dam's spillway with crushed rock and constructing the spillway with steep sides to preclude the accumulation of shallow water and vegetation to reduce mosquito habitat.		X	
129. Where an existing reservoir has filled with silt, consider cleaning to reduce shallow water habitat conducive to mosquito reproduction.		X	
130. During confirmed West Nile virus outbreaks in sage-			X

Measure	Required Design Feature	BMP Required when the resources/values are present	BMP Applied if appropriate
grouse habitat, consider larvicide applications.			
<b>Travel Management Required Design Features</b>			
131. Designate or design routes to direct use away from priority areas identified in Wildfire and Invasive Species Assessments and still provide for high-quality and sustainable travel routes and administrative access, legislatively mandated requirements, and commercial needs	X		
<b>Recreation Required Design Features</b>			
132. Direct use away from GRSG priority areas as described in the Wildfire and Invasive Species Assessments.	X		
133. Eliminate or minimize external food sources for corvids.		X	

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**Appendix B – Seasonal Timing Restriction**

During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6:00 p.m. and 9:00 a.m. to avoid disturbance to lekking and roosting sage-grouse.

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## Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary 06/16/2014 Draft

Compilers: Paul Makela, BLM; Jason Sutter, BLM; Chris Colt, USFS; Don Kemner, IDFG; Jason Pyron, FWS; Katie Powell FWS. BMPs, RDFs, Rationale reflect group consensus on 6/10/2014.

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
<b>Incidental disturbance to individual GRSB within all habitat types during all seasons</b>			
	Public or administrative activities that include incidental foot, aerial, horseback, or other similar travel.	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.
	Livestock grazing activities (except where specifically noted below).	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.
	Public vehicle travel not otherwise restricted in Travel Management Plans; or administrative vehicle travel on existing routes for maintenance of existing infrastructure, facilities, or vegetation projects; or non-organized/non-permitted activities.	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.

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Loss (i.e. death) of nests/eggs, chicks and/or adults that may occur within the nesting <sup>4</sup> habitat during the nesting season			
	Anthropogenic activities such as the use of heavy equipment <sup>2</sup> or targeted grazing in nesting habitat <sup>3</sup> for: 1) implementation of fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events	BMP Core, Important, General: Avoid these activities within nesting habitat during the nesting <sup>3</sup> season.	Application of the seasonal nesting habitat restriction would avoid and minimize the loss of nests/chicks/hens. This is a BMP since the impact is loss of individual grouse and is small scale and not population-scale. Disallowing infrastructure maintenance or construction in nesting habitat outright may not be realistic as an RDF. Impacts may be able to be offset via appropriate mitigation.
	Bedding Sheep & Associated Camps	BMP: Core, Important, General: During the nesting season, locate bedding areas and camps outside of sagebrush areas <sup>3</sup> .	Application of the seasonal nesting habitat restriction would avoid/minimize the loss of nests/chicks by focusing bedding and camps in areas not meeting nest habitat characteristics for sagebrush cover (i.e., use areas less than 15% canopy cover).
	Fences	Existing Fences:  RDF: Core and Important; BMP for General- Where consistent with policy, laws and/or regulations relative to Wilderness, Wilderness Study Areas and Visual Resource Management, move, modify (e.g. lay down fences) or mark existing	Application of these measures would avoid/minimize the loss of birds to fence strikes.

**Comment [PM1]:** Marking fences in Wilderness, WSA, or certain VRM classes is problematic. I added caveat about "where consistent with...". Discussed with Robin F. 6/16/14.

		fences to reduce collision risk within areas that have a high probability of fence strikes (per Stevens et al. 2012 model or latest science).	
		New Fences:  RDF: Core and Important; BMP for General- Do not construct new fences within areas of high collision risk unless marked or modified, consistent with policy, laws and/or regulations relative to Wilderness, Wilderness Study Areas and Visual Resource Management .	
<b>Permanent functional or physical loss of a lek or declining attendance at lek<sup>4</sup></b>			
	Unleased fluid minerals	Stipulation: Core, Important, General: Do not allow wells, pads, facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek.  Stipulation: Core, Important, General: Limit average well pad density to no more than 1 per 640 acres within nesting <sup>3</sup> and winter <sup>3</sup> habitat.	This impact may have a population level effect and trip a population trigger therefore we recommended this be an RDF. Recent literature says 0.25 mile and 0.6 mile buffers are not sufficient (Harju et al. 2010). Hess (2011 MS Thesis) found statistical evidence that oil/well pad influence extended as far as 1.6 km from grouse leks. The 1/640 density per based on consideration of 1) Harju et al. (2010) who found pad density of 1.54 pad/sq km (1 pad/247 ac )

**Comment [PM2]:** Changed Fluid Mineral from RDF/BMP to Stipulation per fluid minerals terminology. Discussed with Karen Porter 6/16/14.

			had 13-74% lower attendance at leks and 2) Doherty (2008 page iii and 79) who noted potential impacts from oil and gas development were indiscernible at ~1 well/640 acres. IDswMT biology team recommended a more conservative approach to minimize risk of tripping a population trigger, hence the 1/640.
	Commercial solar development	<p>RDF: Core-No commercial solar development.</p> <p>RDF: Important- Do not allow new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek<sup>4</sup>.</p> <p>BMP-General: Avoid new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek<sup>4</sup>.</p>	No specific literature available relative to solar development. Recommended buffer is based on recent literature (Harju et al 2010) that 0.6 or 0.25 mile buffers are not. The 2 mile buffer is consistent with Connelly et al. 2000 regarding energy facilities (page 978).
	Roads	BMP: Core, Important, General: Do not construct new paved or high volume traffic gravel roads within 0.8 mile (1.3 km) of leks <sup>4</sup> .	Patricelli et al. 2012 (Recommendations for interim protections in WY) recommended siting roads 0.7 to 0.8 miles from crucial seasonal habitat. We apply it here as a lek-centric BMP because we may need to construct a road near a lek (perhaps for fire operations/access or to allow

			<p>access to private lands or per ROW need). If we buffer roads in the Core or Important Zone via a large lek buffer, it may lead to disturbance of a much larger area of nesting habitat in the course of avoiding the lek and buffers. The BMP would at least allow for siting to avoid the lek, and reducing road noise near the lek, without compromising broader landscapes.</p>
	<p>Commercial/ industrial Pipelines (oil, gas, slurry, and similar)</p>	<p>BMP: Core, Important, General. minimize removal of sagebrush within 0.6 miles of leks<sup>4</sup>.</p>	<p>Application of this measure is designed to minimize loss of sagebrush in the vicinity of the lek. The main concern was with loss of sagebrush in vicinity of lek, that is used by GRSG for cover. The 0.6 mile buffer is based on rationale in the Colorado GRSG Conservation Plan as below:</p> <p>BACKGROUND INFORMATION: From Colorado GRSG Conservation Plan Appendix B: [Lek Habitat (March through mid-May) - The basis and rationale for the first radius, 0.6 miles from a lek (Fig. B-1), is developed by summarizing data from 5 separate studies of daytime movements of adult male sage-grouse during the breeding season (Carr 1967, Wallestad and Schladweiler 1974,</p>

			<p>Rothenmaier 1979, Emmons 1980, Schoenberg 1982), because daytime movements of adult male GRSG during the breeding season do not vary greatly. Wallestad and Schladweiler (1974) found daily movements of adult males ranged between 0.2 and 0.8 miles from leks, with a maximum cruising radius of 0.9 - 1.2 miles. Ellis et al. (1987) reported that dispersal flights of male GRSG (to day-use areas) ranged from 0.3 – 0.5 miles, with the longest flights ranging from 1.2 – 1.3 miles. Carr (1967) recorded a cruising radius for male GRSG that ranged from 0.9-1.1 miles. Rothenmaier (1979) found that 60-80% of male GRSG locations were within 0.6 - 0.7 miles of a lek. Emmons (1980) reported that male dispersal distances to day-use areas of 0.1 miles were common and that 67% of all use areas were greater than 0.3 miles from the lek. In addition, Schoenberg (1982) found that male daily movements averaged 0.6 miles, but ranged from 0.02 - 1.5 miles.</p> <p>Male GRSG activity patterns during the breeding season include strutting during the early morning hours, feeding and</p>
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			<p>loafing during the day, and roosting on the lek during the night. Grouse attending the lek do not always roost on the exact location where the strutting occurs the next morning. Occasionally (this is lek-dependent), grouse roost in adjacent sagebrush cover. Ultimately, male GRSG require an open area for strutting, and sagebrush immediately adjacent for feeding and loafing. Sagebrush adjacent to the lek is also used as escape cover from predators or other types of disturbance. Female GRSG that attend the lek also use the area in this zone in the same fashion as do males (Patterson 1952, Barnett and Crawford 1994, Coggins 1998).]</p> <p>Study locations noted above: Carr-Colorado; Wallestad and Schladweiller- Montana; Emmons-Colorado; Schoenberg- Colorado; Rothenmaier –unable to locate Univ. WY Thesis but study area not defined.</p>
	<p>Miscellaneous anthropogenic structures/ activities (e.g., corrals, water windmills, apiaries, signs, informational kiosks, etc.)</p>	<p>BMP Core, Important, General: Avoid human activities or placement of new structures as noted within 2 miles (3.2 km) mi</p>	<p>This is a catch all to reduce impact of miscellaneous structures where possible (some are tall<sup>5</sup>, such as water windmill, some are small,</p>

		of a lek <sup>4</sup> or ensure they are out of the viewshed of the lek.	but have human activity- such as kiosks) or activities not otherwise addressed in this table. Based on biology team discussion and input, and Connelly et al. 2000 Guidelines that state, "avoid building powerlines and other tall structures that provide perch sites for raptors within 3 km of seasonal habitats" (page 977). Avoiding "seasonal habitats" entirely by 3 km would preclude any of these activities at all in Core, Important or General, but siting 2 miles + from leks as a BMP would nonetheless help protect leks from disturbance. Adding the "viewshed" caveat can help with siting in cases where topography or such screens view of the activity or structure.
	Campgrounds and other developed recreation facilities (trailheads etc.)	BMP: Core, Important, General. Avoid development of new campgrounds or recreation facilities in nesting habitat.	Biology team discussion. No literature specific to this issue. Aldrich (2012) mentions GRSG avoidance threshold 2.5 km from any single development at patch scale.
	OHV Play or Open Areas	RDF-Core and Important; BMP for General. No new Open or Play areas.	Rationale is to reduce risk for further noise, habitat loss, fire risk in the Core, Important and General zones.



	Solid Minerals		These measures for solid minerals are intended to reduce noise and human disturbance to lekking birds. Siting/ avoidance buffers not realistic due to the nature of mineral deposits.
		Locatables-BMP Core, Important, General: Access roads and associated infrastructure not on the mining claim-Avoid disturbance to leks <sup>4</sup> during the lekking season.	Regulations 43 CFR 3809.420 performance standards, speak to T/E, and habitat. As a BMP, it provides an opportunity to work with the developer where we can, such as routing access roads etc., siting of facilities/infrastructure etc., that are off the claim, that we have some discretion with.
		Salables- RDF: Core: Do not construct new salable development within 0.8 mile (1.3 km) of leks <sup>4</sup> .	<u>Salables</u> - No literature specific to salables but buffer distance is based on the noise literature for roads. See Patricelli et al. 2012 (WY recommendations for interim noise protections) that recommended siting roads 0.7 to 0.8 miles from crucial seasonal habitat. Chose RDF for Core and BMP in Important and General habitat since new Salable pits (e.g., gravel) may be necessary to support road maintenance or improvement for access by fire operations or for other locally important factors.

		<p>Leasables-non-energy (e.g., phosphate)-</p> <p>RDF-Core and Important: New phosphate leasing is administratively unavailable.</p> <p>BMP-Core, Important, General- On existing leases avoid disturbance to leks<sup>4</sup> during the lekking season</p>	<p><u>Leasables:</u> None presently known in Core based on current mapping, but Core RDF included in case of a trigger trip and re-delineation of IDswMT subregional management zones.</p> <p>In "Important" there is only one such area with existing lease and Known Phosphate Lease Areas (KPLAs), just west of Bear. It is Federal mineral/private surface. No interest in surface mining but there is interest by a company in underground development. Company is proposing facilities on surface, but working with IDFG locally. Lek within .3 mile.</p> <p>BMP for lek disturbance for all Management Zones in case of trigger trip and IDswMT Management Zone re-delineation and since there are some KPLAs in the General Management Zone. Working with proponent to reduce lek disturbance is realistic and may take on different forms, such as road access, placement of</p>

			facilities, etc.. However, "exclusion" buffers are not realistic given the nature of the location of solid mineral deposits (i.e., cannot site elsewhere). For these, incorporation of appropriate mitigation, in addition to the lek BMP may need to be a primary focus.
	Wind development (commercial)	<p>RDF: Core-No commercial wind development .</p> <p>BMP: Important and General: Avoid wind development in nesting and/or winter habitat.</p>	<p><u>Wind</u>: Labeau et al. (2014) stated that erecting wind turbines at least 5 km from nesting and brood rearing habitat should reduce negative impacts, at least in the short term. However putting a 5 km (3 mile) buffer around leks in Important habitat, would create a defacto closure for the most part, inconsistent with the intent of the Important designation. Hence BMP to avoid placement in nesting or winter habitat.</p>
	Communication Towers	<p>RDF: Core -Do not allow communication tower construction within 3 miles (5 km) of a lek<sup>4</sup> unless needed to address public safety needs.</p> <p>BMP- Important and General-- Avoid communication tower construction within 3 miles (5 km) of a lek<sup>4</sup> unless needed to address public safety needs.</p>	<p>Johnson et al. (2011 pg. 427) noted "Analogously, across all management zones there was a steady downward pattern of trends of lek counts as the number of towers increased, either within 5 km (Fig. 21) or within 18 km (Fig. 22)."</p>

	Transmission Lines	<p>RDF: Core, Important, General: Do not allow transmission line construction within 600 m of a lek.</p> <p>BMP Core, Important, General: Avoid transmission line construction within 2 miles (3.2 km) of a lek.</p>	<p>A 600 m GRSG avoidance zone reported per Gillan et al. (2013). No other spatial buffer supported by literature. While 600 m is a citable buffer, a 2 mile zone as BMP for Transmission is recommended as well. Based on Connelly et al. 2000 Guidelines to avoid tall structures in important seasonal habitats.</p>
	Distribution Lines	<p>BMP: Core, Important and General-Avoid distribution line construction within 600 m of a lek or bury where possible</p>	<p>600 m, based on Gillan et al. BMP as this may not always be feasible.</p>
<b>Temporary functional loss of a lek<sup>4</sup>. SEASONAL RESTRICTION</b>			
	<p>Anthropogenic activities that result in noise or visual disturbance that may lead to sustained avoidance of the lek during a particular lekking season.</p>	<p>RDF: Core and Important- No repeated or sustained behavioral disturbance (e.g., visual, noise, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season<sup>3</sup>.</p> <p>BMP-General: Avoid repeated or sustained behavioral disturbance (e.g., visual, noise, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season<sup>3</sup>.</p>	<p>Recent literature says 0.25 mile and 0.6 mile buffers are not sufficient (Harju et al. 2010). Hess (2011 MS Thesis) found statistical evidence that oil/well pad influence extended as far as 1.6 km (~ 1 mile) from grouse leks. . IDswMT biology team recommended a more conservative approach to managing disturbance to minimize risk of disturbance.</p>

	Sheep Bedding & Sheep Camps	BMP Core, Important, General: Avoid bedding sheep and placing camps within 0.6 mi of a lek during the lekking season.	No literature. BMP based on biology team consensus.
	Organized Recreational Events	RDF Core and Important-Do not schedule disruptive recreational events (e.g., motorized races) within 2.0 miles (3.2 km) of occupied leks during the lekking season.  BMP General- Do not schedule disruptive recreational events (e.g., motorized races) within 2.0 miles (3.2 km) of occupied leks during the lekking season.	Biology team consensus. No specific literature relative to buffers for recreational events but can manage this through avoiding the appropriate season. This threat (organized recreational events) is a short term, typically one-day event, with temporary disruption from noise the main issue.
<b>Permanent functional or physical loss of nesting or winter habitat.</b>			
	Anthropogenic development or activities that result in loss of habitat or constant or repeated noise levels or objects on the landscape that result in permanent avoidance of the habitat.	Ensure > 80% of the landscape is functionally and physically meeting GRSG habitat objectives appropriate to the seasonal habitat <sup>3</sup> .	Impacts resulting from loss of habitat vary depending on the extent of the habitat lost. Minimal loss of habitat (e.g. removal of small amounts of sagebrush cover) would not likely result in any measurable impacts to GRSG individuals or the associated populations.  More extensive loss of habitat may result in increased probability of population level impacts, and trigger trips, through the increased probability that leks will no longer persist.

	Roads	BMP: Core, Important, General: Avoid construction of new paved or high volume traffic gravel roads within 0.8 mile (1.3 km) of nesting habitat.	See citations used for permanent loss of leks, above.
	Unleased Fluid Minerals	Stipulation: Core, Important, General: Limit average well pad density to no more than 1/640 acres within nesting <sup>3</sup> and winter <sup>3</sup> habitat.	See citations used for permanent loss of leks, above.
	Commercial Solar	RDF: Core-No commercial solar development.  RDF: Important: Do not allow facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek <sup>4</sup> .  BMP-Important: Avoid placing new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek <sup>4</sup> .	See citations used for permanent loss of leks, above.
	Campgrounds	BMP-Core, Important, General. Avoid development of new campgrounds or recreation facilities in nesting habitat.	See citations used for permanent loss of leks, above.
	OHV Play and Open areas	RDF-Core and Important. No new Open or Play areas. BMP-General: Avoid new Open or Play areas	See citations used for permanent loss of leks, above.

**Comment [PM3]:** Changed from RDF/BMP to Stipulation per fluid minerals. Discussed with Karen Porter 6/16/14.

	Wind Development (commercial)	RDF Core. No commercial wind development .  BMP: Important: Avoid wind development in nesting habitat	See citations used for permanent loss of leks, above.
<b>Temporary functional loss of winter habitat</b>			
	Anthropogenic activities that result in noise or visual disturbance that may lead to avoidance of a particular wintering area during a particular wintering season.	RDF: Core, Important- No repeated or sustained disturbance from construction activities in winter habitat during the wintering season.  BMP General: Avoid repeated or sustained disturbance from construction activities in winter habitat during the wintering season.	No known buffer. Biology team recommendation.

<sup>1</sup> Land use allocations or activities provided below are examples, but are not limited to those listed.

<sup>2</sup> Heavy equipment includes but is not limited to: tractors, discs, drills, mowers, Lawson aerators, large sprayers, masticators, dozers, graders, large trucks, excavators, backhoes cranes.

<sup>3</sup> As per Habitat Objectives table. Based on local GRSG seasonal use dates. Lekking ~ March 1-May 2<sup>5</sup> depending on elevation; Nesting /early brood ~April 1-June 30; Winter ~December 1-February 28. Source-Modified from ISAC 2006.

<sup>4</sup> Occupied lek as per IDFG definitions (active during at least one of past 5 years). Undetermined status leks will be evaluated on a case by case at the site specific scale during project-level NEPA.

<sup>5</sup> Definition of "tall structure": Any structure that has the potential to disrupt lekking or nesting GRSG and/or decrease the use of an area. This includes but is not limited to communication towers, meteorological towers, electrical transmission or distribution towers, etc.

## Appendix F – Idaho Key Habitat Map Update Process

As directed in IM ID-2013-010, Idaho BLM annually updates the Key Habitat map. The purpose of this Instruction Memorandum (IM) is to request updates to the Idaho Sage-grouse Habitat Planning Map. The update is needed to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. This update is also intended to capture additional edits recommended by the field offices, sage-grouse Local Working Groups (LWG), or agency partners in sage-grouse conservation.

**Factors to Consider During Edits:** The following factors are applicable to land of any ownership status for which the Bureau of Land Management (BLM) data are available, or for which data or other information are provided by non-BLM partners. If such new data are unavailable, or not provided by partners, retain the existing spatial data in the dataset:

1. Wildfires that have occurred in the most recent calendar year fire season on land administered by the BLM and on land not administered by the BLM.
2. Vegetation management projects that have been completed within key habitat or potential restoration areas of sage-grouse planning areas. This includes activities such as burned area rehabilitation seeding projects, sagebrush thinning/reduction, conifer thinning/reduction, restoration of annual grasslands, new fuel breaks, etc. However, only consider those treatment areas completed and where a change in habitat classification has occurred (e.g., from annual grassland to perennial grassland; perennial grassland to key habitat, etc.). Areas planned for treatment or in the process of treatment (e.g., cheatgrass chemical treatment is completed, but seeding is pending) should not be included until an observed change in habitat category is achieved.
3. Changes in habitat status resulting from vegetation succession, such as perennial grasslands that have transitioned to key habitat due to increased sagebrush cover.
4. Habitat mapping errors or omissions that have been identified in the existing Idaho Sage-grouse Habitat Planning Map and other edits recommended by sage-grouse conservation partners, as appropriate. For this item, it is crucial that BLM field office biologists or an alternate staff specialist coordinate closely with their agency partners, especially the UFSFS and the Idaho Department of Fish and Game (IDFG), to actively solicit and resolve additional suggested edits that we may not be aware of. Those edits must also be incorporated into the respective BLM office's update submission. This is vital to ensure that the update is completed efficiently and as collaboratively as possible.
5. Since the Idaho Sage-grouse Habitat Planning Map is intended for use by all conservation partners in Idaho, it is important that we maintain a seamless coverage across land ownerships. In that regard, when editing, do not clip out BLM (or non-BLM land) on the basis of land ownership. Rather, make edits based on vegetation boundaries only, using the best available information and



professional judgment. If you have uncertainties about accuracies for certain areas, document that in the metadata as appropriate.

6. Based on discussions during map updates in recent years, we will again use a 10.0 acre minimum polygon size for wildfires since data are readily available to that scale. For vegetation treatments, we will also use a minimum area of 10 acres. For sagebrush or other vegetation patches (e.g., key habitat, perennial grassland, annual grassland, conifer encroachment), delineate habitat to the extent you have data, recognizing that some offices may have more recent, finer resolution data than others.
7. Areas that have recently burned, for which the field has little or no information as to habitat status, should be classified as “recent burn.” Efforts to document the general habitat status in these areas should be made the following field season if possible, in preparation for the next map update. The field may also attribute 2013 fires as perennial grassland or annual grassland, as appropriate.
8. Sage-grouse habitat polygon descriptions relevant to this IM include key habitat, perennial grassland, annual grassland, and conifer encroachment potential restoration areas.
  - o Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year.
  - o Perennial grassland can be reclassified as key habitat once average sagebrush canopy cover is at least 10 percent.
  - o Annual grassland areas may be reclassified as perennial grassland once a restoration, fuels treatment or related project, such as an Emergency Stabilization and Rehabilitation (ES&R) seeding, is considered successful (i.e., seeded perennial species have successfully established).
  - o Conifer encroachment areas may be reclassified as key habitat following treatment of conifers if sagebrush cover is at least 10 percent and there is a perennial understory. They can also be reclassified as perennial grasslands if native perennial herbaceous species are dominant or if an associated restoration seeding is successful.
9. Field offices must ensure that original project-level data utilized in this update, including Global Positioning System data files, spatial, tabular and metadata associated with specific vegetation treatments, restoration projects, ES&R projects, etc., are archived at the field level and readily accessible in the event of future data calls.

## Appendix G

### Part I – Baseline Map and Description of Development

**Comment [BER1]:** Need to Develop the description and map.

### Part II - Adaptive Management - Soft Trigger Considerations and Implementation Actions

The Sage-Grouse Implementation Task Force would utilize monitoring information to assess when triggers have been tripped. When information indicates that the soft habitat or population trigger may have been tripped, a Sage-Grouse Implementation Task Force - aided by the technical expertise of IDF&G - will assess the factor(s) leading to the decline and identify potential management actions. The Sage-Grouse Implementation Task Force may consider possible changes in management to the CMA. As to the IMA, the Sage-Grouse Implementation Team may review the causes for decline and potential management changes only to the extent those factors significantly impair the state's ability to meet the overall management objective. It is anticipated IDF&G will collect data annually and will make recommendations to the Implementation Team by August 31st for population triggers and January 15th for habitat triggers.

Only where the monitoring information indicates the cause(s) of the decline is not a primary threat will the Sage-Grouse Implementation Task Force analyze the secondary threats to the species and determine whether further management actions are needed.

#### Potential Implementation Level Actions to Consider in the Event Soft Trigger Criteria are Met

- ✓ Increase monitoring and evaluation of sage-grouse populations in Core Management Area (area of concern).
- ✓ Implement Core Management Area management strategy in corresponding Important Management Area of the same Conservation Area.
- ✓ Implement Core Management Area RDFs in corresponding Important Management Area of the same Conservation Area.
- ✓ Not allow any new (large) infrastructure development within the Core Management Area (no exceptions allowed).
- ✓ Reallocate resources to focus on primary threats in the Core Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Reallocate resources to focus on secondary threats in the Core Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Apply Core Management Area criteria for all primary threats, and/or all secondary threats to the Important Management Area.
- ✓ Reallocate resources to focus on primary threats in the Important Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Reallocate resources to focus on secondary threats in the Important Management Area (e.g. direct resources from other parts of the state to the area of concern).

### Part III – Livestock Grazing Management Response

If Livestock Grazing is determined to be a Causal Factor Consider the Following Measures:

1. Employ grazing management systems that ensure adequate nesting and early brood rearing habitat within the breeding landscape.
2. When use-pattern mapping or monitoring demonstrates an opportunity to adjust livestock distribution to benefit occupied sage-grouse breeding habitat, include as appropriate herding, salting, and water-source management (e.g., turning troughs/pipelines on/off, extending pipelines/moving troughs) in grazing programs.
3. If available and feasible, utilize exotic perennial grass seedings and/or annual grasslands to avoid breeding season of use of occupied sage-grouse habitat.
4. Modify authorized seasons of use within grazing permits to provide greater flexibility in managing livestock for the benefit of sage-grouse.
5. Where appropriate, maintain residual herbaceous vegetation at the end of the growing/grazing season to contribute to nesting and brood-rearing habitat during the coming nesting season. Table 5.
6. Insure that permittees are informed of management and movement requirements related to avoidance of recent burns, rehabilitation seedings or other restoration sites.
7. Manage grazing of riparian areas, meadows, springs, and seeps in a manner that promotes vegetative structure and composition appropriate to the site. In some cases enclosure fencing may be a viable option. However, recognize the availability and quality of desired herbaceous species may be improved by periodic grazing use of the enclosure.
8. Implement management actions (grazing decisions, allotment management plan/conservation plan development, or other agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. Employ proper grazing management by providing flexibility in scheduling the intensity, timing, duration and frequency of grazing use over time that best promotes management objectives. During drought periods, prioritize evaluating effects of drought in the CMA relative to grouse needs for food and cover. Ensure that post-drought management allows for vegetation recovery that meets sage-grouse needs in priority sage-grouse habitat areas.
9. When using salt or mineral supplements: a) place them in existing disturbed sites, areas with reduced sagebrush cover—e.g., seedings or cheatgrass sites—to reduce impacts to sage-grouse breeding habitat, b) where feasible use salts or mineral supplements to improve management of livestock for the benefit of sage-grouse habitat.
10. In general, avoid constructing new fences within 2 km of occupied leks. Where feasible, place new, taller structures, such as corrals, loading facilities, water-storage tanks, windmills, etc., at least 2 km from occupied leks to reduce opportunities for perching raptors. Careful consideration, based on local conditions, should also be given to the placement of new fences or structures near other important seasonal habitats (winter-use areas, movement corridors etc.) to reduce potential impacts.
11. New spring developments in sage-grouse habitat should be designed to maintain or enhance the free-flowing characteristics of springs and wet meadows. Analyze developed springs, seeps and associated pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within priority sage-grouse habitat. Make modifications where necessary, considering impacts to other water users when such considerations are neutral or beneficial to sage-grouse.
12. Ensure that new and existing livestock troughs and open water storage tanks are fitted with ramps to facilitate the use of and escape from troughs by sage-grouse and other wildlife. Do not use floating boards or similar objects, as these are too unstable and are ineffective. Use BMPs to mitigate potential impacts from West Nile virus.

13. When placing new water developments in sage-grouse breeding habitat, choose sites and designs that will provide the greatest enhancement for sage-grouse and sage-grouse habitat.
14. Avoid new water developments in higher quality native breeding/early brood habitats that have not had significant prior grazing use except in situations in which water developments may aid in better livestock distribution across the allotment and will not adversely impact the species.
15. Identify and when feasible, establish strategically located forage reserves focusing on areas unsuitable for sage-grouse habitat restoration or lower priority habitat restoration areas.
16. Monitor for, and treat invasive species associated with, existing range improvements.
17. Consider initiating vegetative manipulation projects where sagebrush canopy cover exceeds optimal characteristics to promote grass and forb understory growth. These projects should only be undertaken where it can be achieved without negatively impacting the species.

### Adaptive Grazing Management Response

BLM will individually analyze those allotments and pastures within the relevant Conservation Area. Given limited agency resources, prioritization will be given to areas that have the potential to provide the greatest benefit to sage-grouse. Allocation of resources should be concentrated on allotments within the CMA that have declining sage-grouse populations. Following those permits within the CMA, resources will be further prioritized to allotments within the IMA with breeding habitats that have decreasing lek counts. Sage-grouse populations that are stable or trending upward will be a lower priority for permit renewal and the adaptive assessment process. The assessment/determination process for sage-grouse pursuant to Standard 8 will consider published characteristics of sage-grouse habitat and the Ecological Site Descriptions, existing vegetation, habitat inventories/assessments (Stiver et al. 2010), and where available, state and transition models that describe vegetation and other physical attributes for sage-grouse. The related characteristics within the categories shown below will also be included. These characteristics indicate the ability of a given area to provide sage-grouse habitat.

Category 1: The grazing allotment (or any pasture/significant area therein) has the existing vegetation and existing ecological condition (seral state) to provide sage-grouse habitat

Category 2: The grazing allotment (or any pasture/significant area therein) has the ecological potential to provide sage-grouse habitat.

Where an allotment or pasture meets one of these Categories above, the GRSG Habitat Management Objectives will be incorporated into relevant resource management plans as the desired conditions with the understanding that these desired conditions may not be achievable:

- (a) due to the existing ecological condition, ecological potential or the existing vegetation; or
- (b) due to causal events unrelated to existing livestock grazing.

Allotments will only be managed for the primary seasonal habitat that it has the potential to support. Typically, summer habitats will be managed to provide the conditions described in Table 3; winter Table 4; and breeding habitats in Table 5. Based on these habitat characteristics, BLM will conduct fine and site scale-habitat assessments to help inform grazing management. Where necessary, a determination of factors causing any failure to achieve the habitat characteristics GRSG HMOs will be conducted at a resolution sufficient to document the habitat condition. This determination will include consideration of local spatial and inter-annual variability. A determination of issues

**Comment [BER2]:** This discussion describes the need to describe how ecological site potential is used to determine use of the habitat management objectives. Nika is working on some description of this which would replace this language.

**Comment [BER3]:** This assumes that any individual area only provides a unique seasonal habitat and does not account for the fact that grouse may use a specific area for several portions of their life history and would need a combination of habitat characteristics.

**Comment [BER4]:** See above comment

**Comment [BER5]:** This is what the HAF does – correct?

attributable to livestock grazing management shall not result from one year of data at a specific location within an allotment. If the process and conditions outlined above demonstrate that livestock grazing is limiting achievement of the habitat characteristics GRSG HMOs, renewed permits will include measures to achieve desired habitat conditions. These measures must be tailored to address the specific management issues associated with seasonal habitat limitations identified in the fine-scale assessments.

**Comment [BER6]:** Is this description consistent with determinations under our regulations?

DRAFT

## Appendix J – Mitigation

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### Part I – Regional Mitigation Strategy

The BLM/USFS will achieve no net unmitigated loss for authorized land uses within greater sage-grouse priority and general habitat. No net unmitigated loss means that impacts from authorized land uses will be fully offset to benefit the species. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to fully offset those residual impacts in order to achieve the no net unmitigated loss standard. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy to address impacts within that Zone. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

#### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy to address impacts within that Zone. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance

- Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
- Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- **Minimization**
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- **Compensation**
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - **Residual Impact and Compensatory Mitigation Project Valuation Guidance**
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects.
      - This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
      - For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure may require an upward adjustment of the valuation.
      - The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
    - **Compensatory Mitigation Options**
      - Options for implementing compensatory mitigation should be identified, such as:
        - Utilizing certified mitigation/conservation bank or credit exchanges.
        - Contributing to an existing mitigation/conservation fund.
        - Authorized-user conducted mitigation projects.
      - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
    - **Compensatory Mitigation Siting**
      - Sites should be in areas that have the potential to yield the greatest conservation benefit to the greater sage-grouse, regardless of land ownership.
      - Sites should be durable (see glossary).
      - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be

considered, if those sites have the potential to yield the greatest benefit to greater sage-grouse and are durable.

- **Compensatory Mitigation Project Types and Costs**
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- **Compensatory Mitigation Compliance and Monitoring**
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.
- **Compensatory Mitigation Reporting**
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- **Compensatory Mitigation Program Implementation Guidelines**
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into Land Use Authorization Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for authorized land uses that may impact greater sage-grouse or its habitat.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to achieve the greatest conservation benefit, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).



To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

## Glossary Terms

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** Specific, on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur.

**Durability (protective and ecological):** The administrative, legal, and financial assurances that secure and protect the conservation status of a compensatory mitigation site, and the ecological benefits of a compensatory mitigation project, for at least as long as the associated impacts persist. (BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts from an authorized land use that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The conservation benefits from compensatory mitigation accruing as early as possible or before impacts have begun. (BLM Manual Section 1794).

## **Part II – Idaho Mitigation Framework**

### **FRAMEWORK FOR MITIGATION OF IMPACTS FROM INFRASTRUCTURE PROJECTS ON SAGE-GROUSE AND THEIR HABITATS**

**Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse State Advisory Committee<sup>1</sup>  
December 6, 2010**

#### **INTRODUCTION**

The Conservation Plan for Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006; as amended in 2009) calls for the development of a “proposal for a mitigation and crediting program for sagebrush steppe habitats in Idaho and recommendations for policy consideration” (Measure 6.2.4.). In early 2010, the Idaho Sage-grouse Advisory Committee (SAC) established the Mitigation Subcommittee to complete this task.<sup>1</sup> The Mitigation Subcommittee met several times from the late spring, through the fall of 2010 and found broad areas of agreement among its diverse participants.

This report presents the Mitigation Subcommittee’s consensus recommendations for the creation of an Idaho-based program to compensate for the impacts of infrastructure projects on sagegrouse and their habitats. This program – called the Mitigation Framework – would serve as a science-based “mitigation module” that project developers and government regulators could use to achieve compensatory mitigation objectives called for in project plans and permits. While compensatory mitigation may help offset certain impacts arising from infrastructure projects, mitigation should not be considered a substitute for first avoiding and then minimizing impacts.

In addition, it is important to recognize that federal and state regulatory or land-management agencies, and county or local governments may also require additional stipulations, conditions of approval or other requirements as well as on-site mitigation, in accordance with applicable law, regulation or policy.

This document proposes a general outline or “skeleton” of policies and procedures for such a program. The Mitigation Framework is designed to be transparent, inclusive, and accountable to defined objectives. The Subcommittee’s purpose is to describe the program in enough detail to foster a dialogue among SAC members, spot important issues and points of agreement, and assess the level of support for developing a functioning mitigation program for Idaho sagegrouse and their habitats.

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<sup>1</sup> Subcommittee participants: John Robison and Lara Rozzelle, Idaho Conservation League; Brett Dumas, Idaho Power Company; Paul Makela and Tom Rinkes, BLM; Don Kemner, Idaho Department of Fish and Game; Will Whelan and Trish Klahr, The Nature Conservancy; Rich Rayhill, Ridgeline Energy, LLC; Lisa LaBolle and Kirsten Sikes, Idaho Office of Energy Resources; Nate Fisher, Idaho Office of Species Conservation; John Romero, Citizen at Large.

## **EXECUTIVE SUMMARY**

The state of Idaho is seeing an increasing number of infrastructure projects, such as transmission lines and wind energy facilities, proposed in the state's sagebrush steppe ecosystems. Where federal permits are required, the environmental review process for these projects will analyze how these projects affect sage-grouse and will consider a range of potential mitigation measures to avoid, minimize, or offset any impacts. It is likely that the environmental review process will lead at least some developers and agencies to implement compensatory mitigation.

Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For sage-grouse, this would include, among other things, protecting and restoring sagebrush habitats to offset habitat losses and other effects of infrastructure projects.

This framework describes the general outline for a sage-grouse compensatory mitigation program in Idaho. This program would employ an "in-lieu fee" approach to compensatory mitigation through which a project developer would pay funds into an account managed by the mitigation program for performance of mitigation actions that provide measureable benefits for sage-grouse and their habitats within Idaho.

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, it offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions. It should be emphasized that this program would not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts through appropriate project siting, design and implementation.

Although the initial focus is on sage-grouse, the Mitigation Framework can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associated species. The suitability of the Framework for other species and natural features has not been evaluated.

The objectives of the Mitigation Framework include:

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by actions that benefit the affected species and habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset the impacts of project development and operation on sage-grouse and sage-grouse habitat, and provide a consistent mechanism to offset impacts to the species that can be evaluated in future reviews of the species' status; and
- Evaluate issues based on best available scientific information, while acknowledging and responding to scientific uncertainty.

The Mitigation Framework would be established through a memorandum of agreement (MOA) among entities that have the capacity and commitment to assist in its implementation. Such parties

may include land and wildlife management agencies, counties, tribes, participating private infrastructure development companies, and non-governmental organizations. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program.

The Mitigation Framework envisions a program with the following attributes: (1) a Mitigation Team and program administrator to steer the mitigation program and ensure strong oversight; (2) technically sound and transparent guidelines for estimating compensatory mitigation costs; (3) a science-based statewide strategy to guide the selection of mitigation actions that will receive funding; (4) provisions that the costs of operating the program will be borne by infrastructure developers that use the Mitigation Framework to deliver compensatory mitigation; (5) monitoring the implementation and effectiveness of mitigation actions funded by the Mitigation Framework program; (6) a system to track benefits provided by the Mitigation Framework to sage-grouse habitat in Idaho; and (7) periodic evaluation and adaptation of the Mitigation Framework program.

This framework provides only a general outline of a proposed Idaho-based compensatory mitigation program. It is intended to assess the level of support for crafting the agreements and completing the technical tasks needed to bring the Mitigation Framework into being.

## **DISCUSSION**

### **I. The Role of Compensatory Mitigation in Infrastructure Development and Sage-grouse Conservation**

#### **A. Mitigation Basics**

Broadly defined, “mitigation” refers to a wide range of measures that are taken to avoid, minimize, rectify, reduce, or compensate for the adverse impacts of actions affecting the environment. See 40 C.F.R. § 1508.20 (definition of “mitigation” in National Environmental Policy Act (NEPA) rules). In this general sense, mitigation should be an integral part of all phases of project planning and implementation.

The focus of this report is on compensatory mitigation – also known as “biodiversity offsets” or “offsite mitigation.” Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For instance, a project developer may fund the restoration of a particular type of habitat in order to replace or “offset” similar habitat that is lost as a result of project construction.

This Framework adopts an “in-lieu fee” approach to compensatory mitigation. Under this approach, a project developer provides funding to a compensatory mitigation program administrator who then distributes the funds to the appropriate government agency, foundation or other organization for performance of mitigation actions. In an in-lieu fee program, the responsibility for actually delivering the compensatory mitigation is transferred from the developer to the program administrator once the developer provides the necessary funds to the in-lieu fee program. It is important to emphasize that compensatory mitigation does not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts. This Framework endorses the principle known as the

“mitigation hierarchy,” which holds that decision makers should consider the elements of environmental mitigation in the following order of priority:

1. Avoid environmental impacts through project siting and design;
2. Minimize the impacts during construction, operation, maintenance, and decommissioning by implementing appropriate conservation measures related to timing and conduct of project activities;
3. Restore areas that have been disturbed or otherwise rectify on-site project-related impacts to the greatest extent practicable; and
4. Compensate for residual impacts (direct and indirect effects that are not mitigated on-site) by providing replacement habitats or other benefits.

This means that compensatory mitigation is addressed only after efforts to avoid, minimize, and mitigate the impacts have been addressed. It also should be noted that significant impacts to habitat areas that support special functions and values for sage-grouse may simply not be replaceable through mitigation and therefore the best course may be to avoid those areas altogether.

### **B. Need for an Idaho Compensatory Mitigation Program**

In recent years, the state of Idaho has seen an increase in the number of major infrastructure projects proposed in the state’s sagebrush steppe ecosystems. Several current proposals involve high voltage transmission lines that would cross over hundreds of miles of sage-grouse habitat. Large scale energy infrastructure projects such as wind farms may also affect large areas of sagegrouse habitat. Where these projects are located at least partially on federally managed public lands they will be required by federal law to go through an extensive environmental review process under NEPA before relevant federal permits are issued. The NEPA process requires the permitting agencies to consider the projects’ environmental effects (both positive and negative), alternatives, and potential mitigation measures. Impacts on sage-grouse will be one of the topics analyzed in the NEPA process.

Even after efforts are taken to avoid and minimize impacts, it is possible that some of these infrastructure projects will degrade some sage-grouse habitat, cause direct sage-grouse mortality, or lead to indirect effects such as avoidance of previously occupied habitat. The extent to which project developers and regulators adopt compensatory mitigation as a means to offset these impacts is not fully known. However, it is likely that at least some developers and regulators will seek to implement compensatory mitigation to benefit sage-grouse and their habitats. Energy companies and other developers face daunting challenges in carrying out compensatory mitigation for sage-grouse habitat. Just identifying specific mitigation actions requires a major effort. Actually implementing sagebrush restoration and enhancement projects is even more difficult and expensive – typically involving years of effort and a significant risk of failure. Delivering this type of technically complex environmental mitigation may be well outside the core business of many infrastructure developers.

### **C. Advantages of the Mitigation Framework**

The Mitigation Framework proposes to respond to these challenges by creating a statewide program to deliver scientifically sound compensatory mitigation for multiple projects. Project developers and regulators would no longer have to design, fund and implement their own mitigation programs. Instead, they would have the option of contributing money to a central fund overseen by agencies with expertise in habitat management and non-governmental partners with similar experience. This approach to compensatory mitigation offers three major advantages. The first advantage stems from the increased efficiency of an Idaho-wide mitigation program compared with fragmented, project-by-project mitigation programs. Mitigation efforts require a significant investment in planning, administration, project oversight, and monitoring. The Mitigation Framework would consolidate these functions, thus avoiding needless duplication. The second advantage is that a state mitigation fund can be used for sage-grouse conservation more strategically and at a greater scale than project-by-project mitigation. As described in more detail below, the Mitigation Framework would fund sage-grouse habitat protection and restoration projects in accordance with a statewide strategy that uses landscape-scale analyses to identify the specific measures and habitats that will provide the greatest benefit for Idaho sagegrouse populations. This Idaho-based mitigation strategy will be integrated with other conservation strategies throughout the range of sage-grouse to ensure that actions taken in Idaho benefit the species as a whole. Third, this method can engage the capacity and competence of natural resources agencies, local governments, private companies, and non-governmental organizations. The Mitigation Framework proposes to enlist these entities in shaping Idaho's strategy, developing criteria for use of the fund, and proposing and implementing habitat protection and restoration projects. The benefits of the Mitigation Framework can be summarized as follows:

*Benefits for Project Developers:*

An efficient and reliable mechanism for meeting compensatory mitigation objectives and permit conditions; and Increased certainty regarding project costs.

*Benefits for Regulatory Agencies:*

Increased certainty that in-lieu fees will result in strategic "on-the-ground" mitigation actions that benefit sage-grouse.

*Benefits for Sage-Grouse:*

Increased certainty that scientifically sound mitigation actions that benefit sage-grouse and offset impacts and habitat losses associated with infrastructure development will be implemented.

#### **D. Ensuring Accountability**

In-lieu fee compensatory mitigation does pose one potentially significant drawback that must be acknowledged and addressed: a poorly designed program may lack accountability for delivering meaningful on-the-ground benefits for sage-grouse. Simply having a project developer contribute to an in-lieu fee mitigation account does not by itself compensate for the sage-grouse impacts caused by the project. Actual mitigation is possible only after well-conceived habitat protection and restoration projects are planned, funded, implemented,

monitored, and successful in achieving stated objectives. The Mitigation Framework seeks to ensure accountability by adopting a series of rigorous and transparent procedures. As described below, the Framework would: (1) ensure that program administration and monitoring functions are adequately funded; (2) provide technically sound guidelines for estimating the costs of delivering compensatory mitigation; (3) establish a sciencebased statewide strategy to guide the program; (4) develop project selection criteria and a request for proposals based on the strategy; (5) require monitoring of the implementation and effectiveness of mitigation actions funded by the program; (6) track benefits the Mitigation

Framework program provides to sage-grouse in Idaho; and (7) require periodic evaluation of the program. Taken together, these procedures provide a high degree of certainty that the Mitigation Framework will be able to turn in-lieu fee payments into tangible, lasting compensatory mitigation for sage-grouse. As described in greater detail in Section E, below, project developers that seek to use the Mitigation Framework will need to show two things. First, they will need to show that their projects' impacts on sage-grouse and their habitats have been evaluated using a scientifically sound process. Second, they will need to show that their contributions to the mitigation fund reflect the Mitigation Framework's compensation guidelines to ensure that funding will be adequate to offset project impacts. Having demonstrated those things, the project developers should then be able to rely on their in-lieu fee contribution to the mitigation account as satisfying their compensatory mitigation objectives or obligations.

## **II. Core Elements of Idaho Sage-Grouse Mitigation Program**

### **A. Program Objectives**

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by mitigation actions that benefit the sage-grouse and their habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset project impacts on sage-grouse and sage-grouse habitat, and provide a consistent mitigation mechanism that can be evaluated in future reviews of the species' status; and
- Evaluate issues based on best available scientific information while acknowledging and responding to scientific uncertainty.

### **B. Scope**

The Mitigation Framework proposes to mitigate for impacts to Idaho sage-grouse and their habitats in Idaho. The initial focus of the Mitigation Framework is on sage-grouse. However, this program can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associate species, such as pygmy rabbits, if project developers and regulators call for such mitigation.

Whether this Framework is suited for mitigation of impacts to a broader suite of species or natural features has not been evaluated. It should be noted that some subcommittee members expect to advocate in other forums that compensatory mitigation should extend beyond sagegrouse. The Mitigation Framework focuses on infrastructure projects because this type of development is the most likely to give rise to compensatory mitigation under existing environmental policies. As used here, the term “infrastructure” refers to building structures that significantly disturb sage-grouse habitat, including but not limited to projects for electricity transmission, energy generation, pipeline conveyance, transportation, communications, and similar purposes. The Mitigation Framework is not intended to apply to existing projects that are not changing in scope or to the renewal of on-going activities, such as grazing permits. In addition, the Framework is not suited to projects with minor impacts because their contributions to the mitigation program would be too small to justify the effort needed to establish and administer inlieu fee payments.

### **C. Integration with Environmental Review Procedures**

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, the Framework offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions. The Mitigation Framework is intended to complement the environmental review process conducted pursuant to NEPA and other federal environmental laws as well as county land use planning authorities. Many energy and other infrastructure projects undergo review and approval at the county level. The issues examined and the level of environmental analysis varies widely among individual counties and individual developers. If a county or developer decides to address sage-grouse impacts, it will be able to use the Mitigation Framework as a mechanism for meeting compensatory mitigation objectives that may arise from the county permitting process.

### **D. Mitigation Strategy**

The next step focuses on the Mitigation Team’s task of developing a statewide, science-based strategy that will guide the use of the mitigation fund. The mitigation program strategy would establish priorities for the use of compensatory mitigation funding based on factors/risks identified in the U.S. Fish and Wildlife Service’s 12-Month Findings for Petitions to List Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered (USFWS 2010) and in the Conservation Plan for Greater Sage-grouse in Idaho (2006). The strategy sets mitigation priorities with a landscape view of sage-grouse needs and highlights mitigation opportunities in Idaho based on best available science. In setting priorities, the strategy considers species and community size, landscape condition, and regional context. The strategy is responsive to the threats and risks described in the sage-grouse 12-month findings. The strategy will also generally describe the types of mitigation actions, project specifications, and best practices that are likely to produce measureable benefits for sage-grouse habitat. Finally, the strategy addresses both implementation and effectiveness monitoring requirements for mitigation actions funded through the program. The Mitigation Framework’s strategy will draw heavily from the State of Idaho’s sage-grouse conservation plan but has a narrower focus. It is intended to provide the specific guidance on program priorities, accepted mitigation measures, and geographic areas of emphasis that potential mitigation project sponsors will need to know when they apply for funds. The strategy plays a crucial role in steering mitigation funding to those activities and places that can provide the most effective benefits for Idaho sage-grouse populations consistent



with strategies to increase the viability of the species throughout its range. To this end, the strategy will address one of the major policy questions that arise in the design of compensatory mitigation systems: how closely should the mitigation actions be linked to the type and location of the habitat that was originally affected by the infrastructure project. Stated in the alternative, does removal of the mitigation action from the area of impact improve the effectiveness of or benefit from the action. Some compensatory mitigation systems place a heavy emphasis on this link by favoring “in-kind” and “on-site” compensatory mitigation over “out-of-kind” and “off-site” compensatory mitigation. The subcommittee members generally favor an approach that allows funding to flow to the projects and locations within Idaho that will provide the greatest overall positive impact on sage-grouse populations. The Mitigation Framework calls for a monitoring program that would assess habitat gains provided by mitigation actions and compare them with the mitigation objectives of the participating infrastructure projects. The nature and purpose of this monitoring is described more fully in Mitigation Program Step 4, below.

Once the strategy is complete, the Mitigation Team will develop project ranking criteria and procedures that will guide the selection of the mitigation actions that will receive funding. The goal is to fund projects that provide high quality, lasting benefits based on landscape scale analyses that actually compensate for project impacts.

### **E. Compensation Guidelines**

The Mitigation Framework Program will develop guidelines that may be used by developers and/or regulators to determine the cost of meeting their compensatory mitigation objectives. These compensatory mitigation objectives determine the extent of compensatory mitigation for each project and are generally incorporated into project plans or permits. The compensation guidelines will provide transparent, technically sound principles for determining how much it costs to deliver habitat mitigation for sage-grouse. In other words, the guidelines will represent best estimates of the true cost of implementing the mitigation actions needed to meet each project’s compensatory mitigation objectives. The guidelines may be used by the project developer and the Mitigation Framework Program Administrator to establish the in-lieu fee that the developer will contribute to the mitigation fund. Specific valuation methods will be developed at a later time and will likely draw from compensatory mitigation systems used elsewhere in the West. Although the details have yet to be worked out, the following outline illustrates the core concepts and principles (shown in bold lettering) that are likely to be employed by the MOA parties in setting the Mitigation Framework’s in-lieu fee structure.

- A common unit of measurement would be established for describing and tracking both the project impacts and the benefits of any compensatory mitigation actions. This unit of measurement can be a physical unit such as “acres impacted” or more specifically “acres of summer brood rearing habitat impacted” or “habitat units” lost.
- While the “common unit of measurement” noted above addresses the area of habitat impacted and mitigated, habitat compensation ratios are used to address the quality of the habitat affected by the infrastructure project. These ratios could specify the number of acres of mitigation required per acre of impacted habitat based on the size, habitat quality/condition and function of the impacted habitat; for more critical or important habitat, more mitigation acres might be required. Thus, habitats with higher quality and importance could have higher compensation ratios.

- Several factors are taken into account in calculating how much it will cost to actually compensate for the acres or habitat units. The recommended approach is to evaluate on the costs of implementing a conceptual portfolio of potential mitigation actions or offset activities that provide benefits for sage-grouse. This portfolio of model projects would include a balanced mix of accepted habitat protection and restoration measures reflecting the types of projects expected to be funded by the mitigation program (in accordance with the strategy discussed above). Examples of projects in this portfolio may include such actions as restoring sagebrush canopy and a native understory on recently burned land, improving riparian areas and wet meadows in early brood-rearing habitat, conservation easements to prevent habitat loss, and land management practices that improve sage-grouse habitat. Project costs include the full range of expenses needed to complete all phases of the mitigation action, including administration and monitoring. The average costs of these model mitigation actions per acre or habitat unit is the foundation of the in-lieu fee calculation.
- In addition, the in-lieu fee should also be adjusted to take into consideration the issue of lag time –the time between when habitat is lost at the impacted site relative to when habitat functions are gained at the compensation site.
- The fee also needs to account for contingencies associated with delivering compensatory mitigation, including an estimate of the risk of failure (i.e., the probability that offsite mitigation will not result in any measureable conservation outcomes) for each mitigation site or project.
- In addition to the fee calculated above, costs for establishing and operating the program, including travel, technical consultation and monitoring of program effectiveness must be included. This overhead fee could range from 5-15% depending on the size and complexity of the proposed mitigation program.

## **F. Program Structure and Oversight**

The Mitigation Framework would be established through a memorandum of agreement (MOA) among the entities that would participate in its implementation. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program. The MOA would serve as a joint powers agreement for state and local government parties. The MOA would establish the following administrative structure for the Mitigation Framework:

1. **Core Team:** A core group would oversee the Mitigation Framework program and provide policy-level guidance for the Science Team and Fund Administrator, described below. The Core Team would be composed of three to seven representatives of diverse perspectives among the MOA signatories.
2. **Science Team:** A team of experts drawn from MOA signatories and other targeted organizations will administer the science-based and technical aspects of the program. The Science Team would consist of several individuals with expertise in relevant areas such as habitat protection and restoration, landscape ecology/spatial analysis, wildlife biology, sage-grouse ecology, project development, and mitigation policy.

The Team would focus on developing the policies and statewide strategy that will guide the program, making requests for mitigation project proposals (RFPs), ranking mitigation proposals that will receive funding, tracking monitoring reports and project benefits, and evaluating program success.

3. Program Administrator: A program administrator will be responsible for fund management and administrative tasks. The program administrator will provide administrative support for the Mitigation Team, manage the mitigation account, and administer grants, contracts, and other agreements.

4. Advisory Committee: A broader advisory committee consisting of agencies, companies and organizations with the skills and commitment that will provide useful advice to the Core Team regarding the implementation of the Mitigation Framework. The specific make up of each of these groups will be determined at a later time. Potential participants in the Mitigation Framework include but are not limited to representatives of:

***State of Idaho:***

Department of Fish and Game Management  
Office of Energy Resources  
Office of Species Conservation  
Idaho Department of Lands Service

***United States:***

Bureau of Land  
U.S. Fish and Wildlife Service  
U.S. Forest Service  
Natural Resources Cons.

***Energy Companies:***

Idaho Power  
Ridgeline Energy  
Conservancy  
Idaho Tribes  
Idaho Sage-Grouse Advisory Committee  
Sage-Grouse Local Working Groups

***Non-Governmental Organizations:***

Idaho Conservation League  
The Nature  
Idaho Counties  
Public Land Users (e.g., grazing

interests)

**G. Funding the Mitigation Program**

The costs of administering the program will be sustained by the project developers that seek compensatory mitigation. Therefore, a portion of the in-lieu fee that project developers contribute to the mitigation account will be applied for program administration. As noted above, protecting and restoring sagebrush habitats are time consuming and expensive undertakings. Ensuring that these activities are conducted with strong oversight should be viewed as an exceptionally wise investment.

**III. Mitigation Program Steps**

The Mitigation Framework envisions a five-step process for developing, implementing, and monitoring compensatory mitigation.

### **A. Step 1 – Assessment of Project Impacts and Development of Mitigation Objectives**

Assessment of project impacts should be undertaken by the project developers proposing new infrastructure projects and the government agencies that conduct environmental reviews of those projects. Although the Mitigation Framework process is not responsible for this step, it is nevertheless crucial to the integrity of the mitigation program. Specifically, the Framework's success in achieving its goal of offsetting major infrastructure project impacts on sage-grouse depends on an accurate accounting of those impacts. For many projects, this analysis will be done as part of the environmental review procedures required by NEPA. As noted above, NEPA requires federal agencies to address the full range of direct, indirect and cumulative impacts of the proposed project, alternatives to the proposed action, and potential mitigation before they act on permit applications. Once impacts have been assessed and compensatory mitigation objectives set, the project developer is ready to engage the Mitigation Framework, starting with determining the developer's in-lieu fee contribution.

### **B. Step 2 – Determine the In-lieu Fee Contribution**

The goal of Step 2 is to use valuation techniques, such as the guidelines presented above, to convert the complex range of project impacts, including direct, indirect and cumulative impacts, into monetary terms that become the basis for the in-lieu fee payment. The accepted in-lieu fee compensatory mitigation plan could be a condition of the instrument approving the project (FONSI, ROD, right-of-way grant, conditional use permit, etc.) and thus legally requires the project developer comply with the approved mitigation plan.

### **C. Step 3 – Commitment of Mitigation Funds by Project Developer**

Infrastructure project developers can employ the Mitigation Framework by entering into an agreement with the program administrator with regard to a specific infrastructure project. This project agreement sets forth the parties' respective responsibilities, including the project developer's commitment to pay the in-lieu fee. Importantly, the agreement provides that the project developer's funds can only be used for the purposes set forth in the Mitigation Framework. The agreement may also include "conditions" as requested by regulatory agencies or project developers. For instance, the agreement might provide that the in lieu fee will be used to fund mitigation actions in specific geographic areas in order to meet permit requirements. The program administrator, based on consultation with the MOA parties, may decline to enter into an agreement that is inconsistent with the Mitigation Framework principles or includes conditions that are burdensome or unworkable. Once the agreement specifying the payment structure and schedule is signed, the project developer makes the required in-lieu fee deposits to an interest bearing account managed by the program administrator. After the completion of this step, the project developer is no longer engaged in the Mitigation Framework – unless it has decided to participate as a MOA party.

### **D. Step 4 – Issue Request for Proposals (RFP) and Select, Implement, and Monitor Mitigation Actions**

At least at annual intervals, the Mitigation Team will issue an RFP that invite private companies, non-governmental organizations, and agencies to submit proposals for sage-grouse habitat protection, restoration, and/or enhancement actions. The RFP will provide guidance to mitigation project sponsors on program priorities and criteria. These priorities and criteria will be drawn from the mitigation program strategy including identification of geographic areas where mitigation might provide the greatest benefits as well as identification of the threats that present the highest risk to the species or its core habitat. The Mitigation Team should also reach out to federal, state, and local agencies, non-governmental organizations and the general public in order to facilitate discussion, engage stakeholders, raise awareness of the program and generate responses to the RFP. The RFP will solicit project proposals that contain an operation or implementation plan and address at least the following elements:

- Geographic area;
- Threats addressed and how the mitigation action project will offset impacts resulting from those threats;
- An analysis of current sage-grouse conditions in the area;
- Resource goals and objectives the mitigation action project will seek to provide;
- A description of any coordination with federal, state, tribal and local resource management and regulatory authorities or other stakeholder involvement required to complete the mitigation action (e.g., requirement for NEPA compliance or county permit);
- A description of recent or proposed projects and events in the vicinity of the proposed project, if any, such as fire rehabilitation treatments, restoration or enhancement treatments or other activities that complement the effectiveness or intent of the proposed, mitigation action;
- A description of the long term protection, management, stewardship for the project being implemented, and the entity responsible for these activities; and
- A commitment to periodic evaluation and reporting on the progress of the project in meeting stated goals and objectives, including a process for adaptively redirecting the project if necessary.

When selecting projects, the Mitigation Team will estimate the biological benefits of the projects activities, the likely success of those activities, the duration of benefit expected and measure those benefits in relation to the strategy and RFP objectives. Mitigation Team and the program administrator will work together on continuing program administration and oversight including annual reporting of program activities, expenditures, and benefits. An annual program report will describe program activities, budget, and assessment of whether the mitigation strategy and associated projects are benefitting sage-grouse and at what level or scale. The Mitigation Team and/or Program Administrator should implement a monitoring program to measure and validate whether project-specific objectives have been met. Monitoring is required of all compensatory mitigation actions to determine if the project is meeting its performance standards and objectives. As mentioned above, at regular intervals, the total habitat and/or population gains provided by the programs will be compared with the habitat/population losses associated with the participating infrastructure projects. The purpose of this comparison is to evaluate the mitigation program and make

any necessary program adjustments – particularly if the monitoring shows that the mitigation benefits are not compensating for habitat losses. This comparison will not be a basis for imposing new, unexpected requirements on the infrastructure project developers.

## **CONCLUSION**

The framework of policies, principles and procedures outlined above are meant to start a dialogue among parties engaged in sage-grouse conservation and infrastructure development. If these parties agree with the Mitigation Subcommittee that there is great value in establishing an Idaho-based compensatory mitigation program, then this framework will mark the beginning of an inclusive effort to fill in the details and complete the tasks needed to bring such a program into being. We have confidence in our collective ability to create a compensatory mitigation program that will benefit infrastructure developers, agencies, conservation interests, and – not least – Idaho's sage-grouse.

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**Part III –****IDAHO AND SOUTHWESTERN MONTANA SUBREGION-NO NET UNMITIGATED LOSS PROCESS****Introduction**

The No Net Unmitigated Loss strategy is a means of assuring that proposed anthropogenic activities, when approved and implemented will not result in long-term degradation of Greater Sage-Grouse habitat or population and will have a net conservation benefit to the species. The attached ‘flow chart’ identifies a screening process for review of proposed anthropogenic activities. The goal of the process is to provide a consistent approach regardless of the administrative location of the project and to ensure that authorization of these projects will not contribute to the decline of the species. Though the initial Steps (1-6) are done prior to initiating the NEPA process, the authorized officer must ensure that appropriate documentation regarding the rationale and conclusion for each is included in the administrative record.

The flow chart provides for a sequential screening of proposals. However, Steps 2-6 can be done concurrently. Steps 7-12 are related to project implementation.

**Step 1**

This screening process is initiated upon formal submittal of a proposal for authorization for use of federal lands (BLM or Forest Service). The actual documentation would include, at a minimum, a description of the location, scale of the project, and timing of the disturbance and would be consistent with existing protocol and procedures for the specific type of use. It is anticipated that the proposals would be submitted by a third party.

**Step 2**

This initial review would evaluate whether the proposal would be allowed as prescribed in the Greater-Sage-Grouse Land Use Plan Amendment. For example, certain activities are prohibited in suitable habitat, such as wind or solar energy development. If the proposal is an activity that is specific prohibited, the submitter would be informed that the proposal is being rejected since it would not be consistent with the Land Use Plan, regardless of the design of the project.

In addition to consistency with program allocations, the Land Use Plan identifies a limit on the amount of disturbance that is allowed within a ‘biological significant unit’ (BSU). If current disturbance within the affected unit exceeds this threshold, the project should be deferred until such time as the amount of disturbance within the area has been reduced, through restoration or other management actions.

**Step 3**

In reviewing a proposal, determine if the project will have a direct or indirect impact on population or habitat (PPH or PGH). This can be done by:

1. Reviewing Greater Sage-Grouse Habitat maps.
2. Reviewing the 'Base Line Environment Report' (USGS) which identifies the area of direct and indirect effects for various anthropogenic activities.
3. Consultation with agency, Fish and Wildlife Service, or State Agency wildlife biologist.
4. Reviewing the standard and guidelines in the plan amendments (such as buffer distances for the proposed activity).
5. Other methods

If the proposal will not have a direct or indirect impact on either the habitat or population, proceed with the appropriate process for review, decision, and implementation of the project.

#### **Step 4**

If the project could have a direct or indirect impact of sage-grouse habitat or population, evaluate whether the proposal can be relocated so as to not have the indirect or direct impact and still achieve the intent of the proposal. This Step does not consider redesign of the project as a means of not having direct or indirect impacts but rather authorization of the project in a physical location that will not impact Greater Sage-grouse. If the project can be relocated so as to not have an impact on sage-grouse and still achieve objectives of the proposal, inform applicant and proceed with the appropriate process for review, decision, and implementation of the relocated project.

#### **Step 5**

If the preliminary review of the proposal concludes that there may be impacts to sage-grouse habitat and/or population, and the project cannot be effectively relocated to eliminate these impacts; evaluate whether the agency has the authority to modified or deny the project. If the agency does NOT have the discretionary authority to modify or deny the proposal, proceed with the authorization process (NEPA) and include appropriate mitigation requirements that minimize impacts to sage-grouse habitat and populations. Mitigations could include a combination of actions such as timing of disturbance, design modifications of the proposal, site disturbance restoration, and compensatory mitigation actions.

#### **Step 6**

If the agency has the discretionary authority to deny the project and after careful screening of the proposal (Steps 1-4) has determined that direct and indirect cannot be eliminated, evaluate the proposal to determine if the adverse impacts can be mitigated. If the impacts cannot be effectively mitigated within the BSU, reject or defer the proposal. The criteria for determining this situation would include but not limited to:

- Natural disturbance within the BSU is significant and additional activities within the area would adversely impact the species.
- The current trend within the BSU is down and additional impacts, whether mitigated or not, could lead to further decline of the species or habitat.



- The proposed mitigation has proven to be ineffective or is unproven in terms of science based approach.
- The additional impacts, after applying effective mitigation, would exceed the disturbance threshold for the BSU.
- The project would impact habitat that has been determined, through monitoring, to be a limiting factor for species sustainability within the BSU.
- Other site specific criteria that determined the project would lead to a downward trend to the current species population or habitat with the BSU.

If the project can be mitigated to provide for a net conservation benefit to the species, proceed with the design of the mitigation plan and authorization (NEPA) of the Project. The authorization process could identify issues that may require additional mitigation or denial/deferring of the project based on site specific impacts to the Greater Sage-grouse.

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Appendix K – Lands No Longer Available for Disposal

**Comment [BER1]:** Needs to build this appendix. List of legal descriptions for lands parcels previously identified for disposal now located in Core (Important?) management zones and now longer available for disposal.

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## Appendix L – Travel Management Planning Guidelines:

- Among other designation criteria from 43 CFR 8342.1(b), “areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
- During subsequent travel management planning, all routes would undergo a route evaluation to determine its purpose and need and the potential resource and/or user conflicts from motorized travel. Where resource and/or user conflicts outweigh the purpose and need for the route, the route would be considered for closure or considered for relocation outside of sensitive GRSG habitat.
- During implementation-level travel planning, threats to GRSG and their habitat would be considered when evaluating route designations and/or closures.
- During subsequent travel management planning, routes that do not have a purpose or need would be considered for closure.
- During subsequent travel management planning, routes that are duplicative, parallel, or redundant would be considered for closure.
- During subsequent travel management planning, seasonal restrictions on OHV use would be considered in important seasonal habitats where OHV use is a threat.
- During subsequent travel management planning, OHV timing limitations would be considered in important seasonal habitats where OHV use is a threat.
- During subsequent travel management planning, consider limiting over snow vehicle (OSV) travel to designated routes, consider seasonal closures in GRSG wintering areas from November 1 through March 31 or define Designation Criteria (i.e. minimization criteria) to regulate over snow vehicle traffic.
- During subsequent travel management planning, routes not required for public access or recreation with a current administrative/agency purpose or need would be evaluated for administrative access only.
- During subsequent travel management planning, consider prioritizing restoration of routes not designated in a Travel Management Plan.
- During subsequent travel management planning, consider using seed mixes or transplant techniques that will maintain or enhance GRSG habitat when rehabilitating linear disturbances.
- During subsequent travel management planning, consider scheduling road maintenance to avoid disturbance during sensitive periods and times to the extent practicable. Consider using time of day limits (After 10:00 AM to 7:00 PM) to reduce impacts on GRSG during breeding and nesting periods.

**Comment [GJS1]:** Motorized only? What about mechanized?

**Comment [GJS2]:** Is this redundant with the first bullet above?

**Comment [BER3]:** Differs from national language

**Comment [BER4]:** Differs from national language

Over-snow vehicle – a motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow.

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Appendix M – Functioning of Boards

Comment [BER1]: Need to build this appendix.

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## Idaho and Southwestern Montana Recommendation for Proposed Plan Amendment

### 1. Summary Description of Plan

- 1.1. Maintain and/or increase the abundance, distribution and connectivity of GRSG by conserving, enhancing and restoring GRSG habitat to maintain resilient populations by reducing, eliminating or minimizing threats to GRSG habitats.
- 1.2. Comply with existing laws, regulations and policies.
- 1.3. Recognize valid existing rights.
- 1.4. BLM and FS would coordinate with the States of Idaho and Montana, as appropriate, during implementation activities including the evaluation of disturbance threshold, adaptive management triggers and mitigation.
- 1.5. The Idaho and Southwestern Montana Sub-Region would be divided into 5 Conservation Areas over which the disturbance threshold and adaptive management triggers would apply. These areas are the West Owyhee, Desert, Mountain Valleys, Southern and Southwestern Montana (Map 1).
- 1.6. The Conservation Areas would be categorized into management zones – Core, Important and General, with the exception of the Southwestern Montana Conservation Area which does not contain Important Management Zones (Map 2).
- 1.7. Adaptive Management: Idaho: actions would engage when population decline by 10 percent or a combined 10 percent loss nesting and/or wintering habitat within Core or Important Management Zones within a Conservation Area is lost (Soft Trigger), and when 20 percent of the population or nesting and wintering habitat within Core or Important Management Zones within a Conservation Area is lost (Hard Trigger) Montana: Adaptive management in Montana is linked with the state evaluation framework.
- 1.8. Additional anthropogenic disturbance (AD-1) would be significantly limited in Core Management Zones with specific exceptions (AD-3 & AD-4); it would be limited unless consistent with specific criteria in Important Management Zones (AD-4) and would be avoided in General Management Zones.
- 1.9. Anthropogenic disturbance (AD-1) would be contained within a 3 percent total disturbance cap as applied to the biologically significant unit (the biologically significant unit (BSU) is defined as the nesting and wintering habitat within Core and Important Management Zones within a Conservation Area), including existing anthropogenic disturbance. In Montana surface disturbance will be calculated through the state surface disturbance analysis process on a project by project basis.
- 1.10. Mitigation would be required for all anthropogenic disturbance activities within GRSG habitat. Within Core Management Zones a standard of no net unmitigated loss would be required.
- 1.11. BLM and Forest Service would set up a Mitigation Board at the State level with state involvement to develop a Mitigation Strategy and oversee the application of mitigation at the site-specific level.
- 1.12. BLM and Forest Service would complete Wildfire and Invasive Species Assessments at the local level to identify priority areas of habitat, and wildfire and invasive species concern. These assessments would support and include the development of fuels, restoration and rehabilitation strategies to use during implementation level activities.

**Comment [BER1]:** Cally Younger – Need clear definition and identify what data layers will be used to calculate this; who is responsible for managing data, etc. Maybe this is in Appendix H.  
Response – the data sets are described in the anthropogenic disturbance section and a further description of those data sets is included in Appendix H.

**Comment [BER2]:** Cally Younger – Only applying disturbance within the BSU could significantly affect the functional 3% disturbance threshold. Task Force recommendations are 3% within nesting and wintering habitat of a CA.  
Response -

**Comment [BER3]:** Cally Younger – Are only impacts in BSU are counted towards the 3%?  
Response – Yes, only disturbance activities within the BSU are part of the 3% calculation, even though mitigation would be required for activities inside or outside the BSU.

**Comment [BER4]:** Cally Younger – How will BLM's new mitigation policy be coordinated with the state effort?  
Response -

**Comment [BER5]:** Cally Younger – What is local – BSU or CA?  
Response – Neither, for the purpose of developing Wildfire and Invasive Species Assessments the scale will be BLM Field Office.

**Comment [BER6]:** Don Kemner – Fuel breaks?  
Response -

### Idaho and Southwestern Montana GRSG EIS – Land Allocation Decisions Summary<sup>1</sup>

Solar/Wind/Nuclear/Hydropower		
Core	Important	General
Exclusion (LR-2)	Avoidance (LR-2)	Open (LR-2)
Commercial Service Airports		
Core	Important	General
Exclusion (LR-3)	Avoidance (LR-1)	Open (LR-1)
Landfills		
Core	Important	General
Exclusion (LR-4)	Avoidance (LR-1)	Open (LR-1)
Utility Corridors		
Core	Important	General
Existing designated corridors which are land use plan designations (and include Section 368 Corridors), will remain “open” (subject to the ongoing settlement agreement) and can provide an opportunity to be modified with mitigation. Any new disturbance within these corridors would count towards the disturbance cap. All new, modified, or deleted corridors will require a land use plan amendment. (LR-7)	Same as Core (LR-7)	Same as Core (LR-7)
High-Voltage Transmission and Major Pipeline ROWs		
Core	Important	General
Avoidance (LR-1)	Avoidance (LR-1)	Open (LR-1)
Other (Minor) Rights-of-Way and Land Use Authorizations/Permits		

<sup>1</sup> The Idaho and Southwestern Montana Subregion includes portions of Idaho, Montana and Utah. Where differences exist between direction for Idaho and Montana those are noted in the table and within the management action section. The lands within Utah are part of the Sawtooth National Forest and are managed as such; therefore direction for these lands in Utah is the same as that described for the Sawtooth National Forest in Idaho.

**Comment [BER7]:** Cally Younger – Does this category cover distribution lines? Communication sites?  
 Response – Yes, this includes both distribution lines and communication sites – the NPT guidance separated management of these while the Idaho plan does not make such a distinction, this was included here to aid in communication.

<b>Core</b>	<b>Important</b>	<b>General</b>
Avoidance (LR-1)	Avoidance (LR-1)	Open (LR-1)
<b>Land Tenure Adjustments</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Retention with exceptions for exchange; available for exchange with no net loss of GRSG within Core and Important. Not available for disposal. (LR-13)	Same as Core (LR-13)	Available for exchange subject to existing land use plan conformance (No Action)
<b>Fluid Mineral Resource Allocation (Includes Geothermal)</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Idaho: Low or no potential areas Closed. Moderate to High potential areas Open subject to No Surface Occupancy. Montana: Open subject to No Surface Occupancy. (FLM-1)	Idaho: Open subject to No Surface Occupancy Montana: Not Applicable (FLM-1)	Idaho and Montana: Open subject to Controlled Surface Use and Timing Limitations (FLM-1)
<b>Locatable Minerals</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Areas not previously withdrawn are Open.	Areas not previously withdrawn are Open.	Areas not previously withdrawn are Open.
<b>Non-Energy Leasables</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Known Phosphate Leasing Areas (KPLAs) are Open subject to standard leasing stipulations. Closed to leasing outside KPLAs (NEL-1)	KPLAs are Open subject to standard leasing stipulations. Areas outside KPLAs are Open subject to standard and greater sage-grouse stipulations (required design features, seasonal timing restrictions). (NEL-1)	Open to leasing with standard and greater sage-grouse stipulations (required design features and seasonal timing restrictions) (NEL-1)
<b>Mineral Materials (Salable Minerals)</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Closed to new site authorizations.	Open to new site authorizations subject to	Open to new site authorizations subject to



Existing sites Open to new sales subject to RDFs, buffers and seasonal timing restrictions. (SAL-1)	criteria. Existing sites Open to new sales subject to seasonal timing restrictions. (SAL-1)	RDFs, buffers and seasonal timing restrictions. Existing sites Open to new sales subject to seasonal timing restrictions. (SAL-1)
<b>Travel Management</b>		
<b>Core</b>	<b>Important</b>	<b>General</b>
Limited (TM-1)	Limited (TM-1)	Limited (TM-1)

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## 2. Goals and Objectives

- 2.1. GOAL-1: Maintain and/or increase the abundance, distribution and connectivity of GRSG by conserving, enhancing and restoring GRSG habitat to maintain resilient populations by reducing, eliminating or minimizing threats to GRSG habitats.
- 2.2. GOAL-2: Provide for the needs of GRSG and their habitat while also providing for resource uses in accordance with the agencies' direction for multiple use and sustained yield as described in FLPMA and the NFMA.
- 2.3. GOAL-3: Manage anthropogenic development and human disturbance to minimize the likelihood of adverse population level effects on GRSG.
- 2.4. GOAL-4: Reduce the risk of West Nile Virus or other disease outbreaks from BLM and USFS management actions.
- 2.5. Management Area (MA) - Objective (OBJ)-1: Maintain a resilient population of GRSG in Idaho and Southwestern Montana.
- 2.6. MA-OBJ-2: Designate GRSG management zones and associated management to maintain a resilient population and to designate strategically located adjacent zones to provide a buffer from unpredictable habitat loss such as wildfire to the resilient population areas.
- 2.7. MA-OBJ-3: Identify and strategically protect larger in-tact sagebrush areas and areas of lower fragmentation to maintain GRSG population persistence.
- 2.8. Vegetation (VEG)-OBJ-1: Reconnect and expand areas of higher native plant community integrity/rangeland health to increase the extent of high quality habitat and, where possible, to accommodate the future effects of climate change.
- 2.9. VEG-OBJ-2: Increase the amount and functionality of seasonal habitats by:
  - a. Increasing canopy cover and average patch size of sagebrush in perennial grasslands.
  - b. Increasing the amount, condition and connectivity of seasonal habitats.
  - c. Protecting or improving GRSG migration/movement corridors.
  - d. Reducing conifer encroachment within GRSG seasonal habitats.
  - e. Improving understory (grass, forb) and/or riparian condition within breeding and late brood-rearing habitats.
  - f. Reducing the extent of annual grasslands within and adjacent to Core and Important Management Zones.Decadal treatment objectives by population area are identified in Table 1.
- 2.10. Habitat Management (HM)-OBJ-1: Maintain or make progress toward 70% of lands within CMZs and IMZs capable of producing sagebrush at 10-30% canopy cover and less than 10% conifer canopy cover.
- 2.11. HM-OBJ-2: Incorporate GRSG Seasonal Habitat Objectives (Table 2) into the design of projects or activities, as appropriate, based on site conditions and ecological potential, unless achievement of fuels management objectives require additional reduction in sagebrush cover to meet strategic protection of GRSG habitat and conserve habitat quality for the species.
- 2.12. FUEL-OBJ-1: Design fuel treatments to restore, enhance, or maintain GRSG habitat.
- 2.13. WHB-OBJ-1: Manage wild horse and burro population levels within the established AML ranges to maintain or enhance GRSG habitat.
- 2.14. WHB-OBJ-2: Prioritize gathers and population growth suppression techniques in HMAs in GRSG habitat, unless removals are necessary in other areas to address higher priority environmental issues, including herd health impacts. Additional prioritization would

**Comment [BER8]:** Cally Younger – In a specific CA or should 'in' be deleted?  
Response – 'in' was deleted.

**Comment [BER9]:** Cally Younger – within and adjacent to...  
Response – change made.

**Comment [BER10]:** Tie this value to what is in the table. Paul and Rob to finish table.  
Response – Table has been updated.

**Comment [BER11]:** Use FS language regarding fuels objectives – get from Rob.  
Response – language has been included.

**Comment [BER12]:** Need to incorporate FIAT results.  
Response – these are incorporated into the various applicable sections.

be given for HMAs that are near AML or where a reduction would serve the most beneficial purpose.

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**Table 1. Acres of Treatment within a 10-Year Period to Achieve Vegetation Objectives<sup>2</sup>**

Population Area	Mechanical Conifer Treatment	Prescribed Fire	Annual Grass Treatment
SW Idaho	15000-16000	600-700	30000-32000
S Central Idaho	10000-11000	100-200	16000-17000
Mountain Valleys	1500-1600	500-600	0
N Snake River	0	4000-4500	20000-21000
Bear Lake Plateau	100-150	0	100-200
Montana	300-400	10000-12000	0

**Comment [BER13]:** From Paul - The figures in this table look more like what we would need to treat annually. Treating 15000 acres of juniper a decade in SW Idaho won't make a dent, nor will 500 acres of RX fire in mountain valleys (that is far less than one typical RX fire project acreage.). Double check model outputs with Robb. In comment review meeting NV/CA mentioned they are reporting this info for 50 year timeframe....Should we. Discuss.  
Response -

**Table 2. Seasonal Habitat Desired Conditions for Greater Sage-Grouse**

ATTRIBUTE	INDICATOR	DESIRED CONDITON
Lek Habitat	Proximity of trees <sup>9,16</sup>	<Trees (e.g. juniper) none to uncommon within 3 km of occupied leks
	Proximity of sagebrush to leks <sup>16</sup>	Adjacent protective sagebrush cover within 100 m of an occupied lek <sup>16</sup>
Nesting Habitat	Apply indicators to areas within 10 km of occupied leks, that have the ecological capability to provide sagebrush cover.	
	Seasonal habitat needed <sup>10</sup>	>80% of the landscape in sagebrush cover
	Sagebrush canopy cover <sup>2,10,11,13</sup>	15-25%
	Sagebrush height <sup>10</sup>	
	Arid sites <sup>3</sup>	12-31 inches (30-80cm)
	Mesic sites <sup>4</sup>	16-31 inches (40-80cm)
	Predominant sagebrush shape <sup>16</sup>	>50% in spreading shape <sup>5</sup>
	Perennial grass cover <sup>2,10</sup>	
	Arid sites <sup>3</sup>	≥10%
Mesic sites <sup>4</sup>	≥15%	
Perennial grass height <sup>10,11,13,16</sup>	≥7 inches <sup>10</sup>	
Perennial forb canopy cover <sup>2,10</sup>		
Arid sites <sup>3</sup>	≥5%	
Mesic sites <sup>4</sup>	≥10%	
<b>BROOD-REARING/SUMMER<sup>1</sup> (July-October)<sup>1</sup> (Apply to all habitat outside of nesting/breeding and winter)</b>		
Cover	Seasonal habitat needed <sup>10</sup>	>40% of the landscape in sagebrush cover
	Sagebrush canopy cover <sup>2,10</sup>	10-25%
	Sagebrush height <sup>10</sup>	40-80cm
	Perennial grass canopy cover <sup>2,10</sup>	>15%
	Upland and riparian perennial forb availability <sup>2,16</sup>	Preferred forbs are common with several preferred species present <sup>7,8</sup>

**Comment [LD14]:** Should "tree" be defined? I am just thinking of areas with mountain mahogany or old-growth juniper in limited patches that we would want to preserve, vs. seral juniper. Maybe there is a way to differentiate by saying "as appropriate for existing soils/ecological sites"??

<sup>2</sup> These acreage figures represent and objective for treatment over a ten-year (decadal) timeframe to support achievement or progress toward vegetation and habitat objectives. This accounts for variations in yearly funding availability and does not reflect a maximum acreage for treatment should funding and site specific conditions allow for more or less treatment than described in order to meet vegetation and habitat objectives.

	Riparian meadow habitat function	>80% relative composition <sup>a</sup> of riparian herbaceous species <sup>9</sup>
<b>WINTER<sup>1</sup> November-March<sup>1</sup> (Apply to areas of low snow accumulation)</b>		
Cover and Food	Seasonal habitat needed <sup>10</sup>	>80%
	Sagebrush canopy cover above snow <sup>2,10</sup>	>10%
	Sagebrush height above snow <sup>10</sup>	>25cm

**Comment [LD15]:** Function is kind of a confusing term to use here. That makes me think of PFC, which doesn't look at spp. Composition. Not a deal breaker, just thought I'd mention it

<sup>1</sup> Seasonal dates can be adjusted by local unit according to geographic region.  
<sup>2</sup> Absolute cover is the actual recorded cover and can exceed 100% when recorded across all species and all layers. It is not relative cover, which is the proportions of each species, and equals 100%. Note that cover is reported for only those species (e.g., sagebrush, preferred forbs) that are sampled to determine suitability of habitat for sage-grouse. Overall cover at the site will be greater than that sampled for sage-grouse habitat, due to other species present.  
<sup>3</sup> 10 – 12 inch precipitation zone; *Artemisia tridentata wyomingensis* is a common big sagebrush sub-species for this type site (HAF 2014).  
<sup>4</sup> ≥12 inch precipitation zone; *Artemisia tridentata vaseyana* is a common big sagebrush sub-species for this type site (HAF 2014).  
<sup>5</sup> Sagebrush plants that are more tree or columnar-shaped do not provide the protective cover of sagebrush with a spreading shape (HAF 2014).  
<sup>7</sup> Preferred forbs are listed in HAF Table III-2 (HAF 2014). Overall total forb cover may be greater than that of preferred forb cover since not all forb species are listed as preferred in Table III-2.  
<sup>8</sup> Cover may be higher according to local riparian classifications.

**Reference List**

<sup>9</sup> Baruch-Mordo, S., J. S. Evans, J. P. Severson, D. E. Naugle, J. D. Maestas, J. M. Kiesecker, M. J. Falkowski, C. A. Hagen, and K. P. Reese. 2013. Saving sage-grouse from trees.

<sup>10</sup> Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. E. Braun. 2000. Guidelines to manage sage-grouse populations and their habitats. *Wildlife Society Bulletin* 28:967-985.

<sup>11</sup> Connelly, J. W., K. P. Reese, and M. A. Schroeder. 2003. Monitoring of Greater sage-grouse habitats and populations. University of Idaho College of Natural Resources Experiment Station Bulletin 80. University of Idaho, Moscow, ID.

<sup>12</sup> Doherty, K. 2008. Sage-grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts. Ph.D. Dissertation. University of Montana, Missoula, MT.

<sup>13</sup> Hagen, C. A., J. W. Connelly, and M. A. Schroeder. 2007. A meta-analysis of greater sage-grouse *Centrocercus urophasianus* nesting and brood-rearing habitats. *Wildlife Biology* 13 (Supplement 1):42-50.

<sup>14</sup> Holloran, M. J., and S. H. Anderson. 2005. Spatial Distribution of Greater Sage-grouse nests in relatively contiguous sagebrush habitats. *Condor* 107:742-752.

<sup>15</sup> Holloran, M. J., B. J. Heath, A. G. Lyon, S. J. Slater, J. L. Kuipers, and S. H. Anderson. 2005. Greater sage-grouse nesting habitat selection and success in Wyoming. *Journal of Wildlife Management* 69:638-649.

<sup>16</sup> Stiver, S. J., E. T. Rinkes, D. E. Naugle, P. D. Makela, D. A. Nance, and J. W. Karl. *In Press*. Sage-Grouse Habitat Assessment Framework: Multi-scale Habitat Assessment Tool. Bureau of Land Management and Western Association of Fish and Wildlife Agencies Technical Reference XXXX-X. U.S. Bureau of Land Management, Denver, Colorado.

<sup>17</sup> Boyd, C. S., and T. J. Svejcar. 2009. Managing Complex Problems in Rangeland Ecosystems. Rangeland Ecology & Management: November 2009, Vol. 62, No. 6, pp. 491-499.

**Maximum Allowable Use Levels for GRSG Habitat**

Seasonal Habitat	Allowable Use of Key Species
Nesting/Breeding <sup>1</sup>	Residual perennial grass height: Grazing post nesting/breeding season: 4 in. <sup>15,16</sup> Grazing during nesting/breeding season <sup>a</sup> : 7 in. <sup>10,15,16</sup>
	<sup>a</sup> Average, assuming current vegetation composition has the capability.
Brood-Rearing /Summer	≤35% shrub species
	≤40% herbaceous species <sup>17</sup>
	≤35% woody species
	Average stubble height 4 inches (depending on site capability and potential) for herbaceous riparian vegetation <sup>17</sup>
Winter	≤35% shrub species

1-Grass heights only apply in nesting habitats with sufficient sagebrush cover (15-25%) to support nesting.

**Comment [PM16]:** This is FS language that will be required. Need to discuss BLM's use of these.

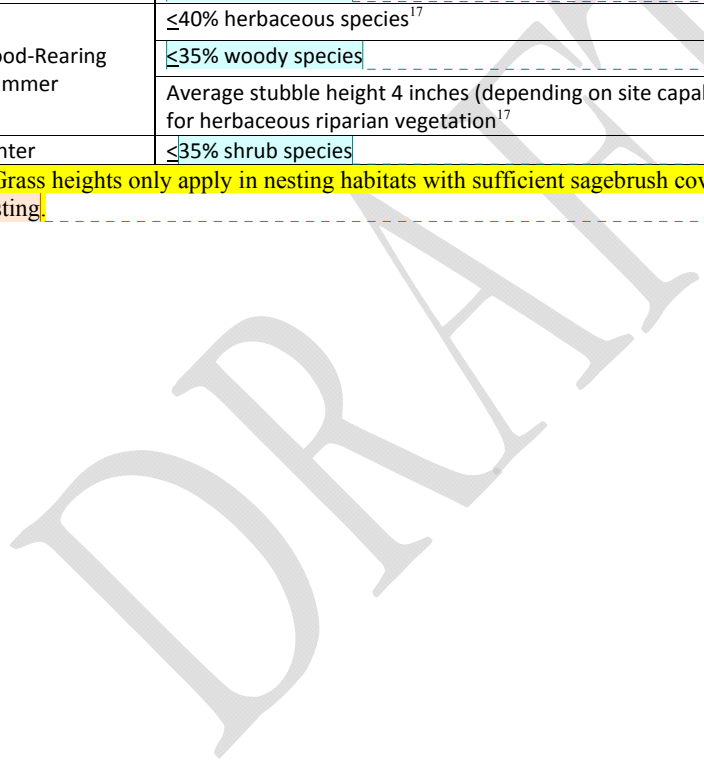
**Comment [LD17]:** Allowable Use is fine for BLM too

**Comment [PM18]:** This is from FS Draft. Assumes we will be monitoring shrub utilization in spring. Need to discuss.

**Comment [PM19]:** This is from FS Draft. Assumes we will be monitoring shrub utilization in summer. Need to discuss.

**Comment [PM20]:** This is from FS Draft. Assumes we will be monitoring shrub utilization in winter. Need to discuss.

**Comment [LD21]:** In the grazing section, we have language about considering ESDs and current site potential as well, so that unrealistic objectives aren't put in place for areas that can't produce 7" every year. May need to spell out how this works if POSE doesn't count towards cover requirements, but it is the main perennial grass out there...



### 3. General Direction (GD)

- 3.1. GD-1: Comply with state and federal laws, regulations, policies, and standards, including FLPMA multiple use mandates and NFMA regulations.
- 3.2. GD-2: Implement actions (day-to-day management, monitoring, and administrative functions) that stem directly from regulations, policy, and law, which are considered in conformance with the LUPA that are not specifically addressed in the plan amendment.
- 3.3. GD-3: Preserve and recognize valid existing rights, which include any leases, claims, or other use authorizations established before a new or modified authorization, change in land designation, or new or modified regulation is approved. Activities on existing mineral leases are managed through terms, conditions and stipulations on the leases, and through specific operating conditions included in operating plan approvals for the duration of the lease.
- 3.4. GD-4: Allowable uses and management actions from the existing LUPs that remain valid and do not require amending are carried forward.
- 3.5. GD-5: Sustain habitat in sufficient quantities and quality for resilient plant and wildlife populations.
- 3.6. GD-6: Provide for human safety and property protection from wildfire.
- 3.7. GD-7: Ensure that existing utility corridors would remain unchanged.
- 3.8. GD-8: Limit all Forest Service-administered lands to designated routes.
- 3.9. GD-9: Existing requirements regarding site-specific environmental analysis, public involvement, consultation with tribes and other agencies, or compliance with applicable laws without waiver are maintained.
- 3.10. GD-10: Appropriate, site-specific analysis as described in NEPA and any requisite site specific decision making (i.e., 43 CFR Subpart 4160, or 36 CFR Part 251) would be conducted prior to approving proposed management actions.
- 3.11. GD-11: Impacts analysis on other sagebrush steppe species and impacts on state endowment trust lands managed by the Idaho Department of Lands would be analyzed during site-specific project NEPA review.
- 3.12. GD-12: Activities not specifically addressed by the plan amendment would still be subject to the allowances and restrictions of the applicable land use plans.
- 3.13. GD-13: Information in the Management Plan and Conservation Strategies for Sage-Grouse in Montana would be considered when designing projects that may affect sensitive species or federally listed species in Montana.
- 3.14. GD-14: Any oil and gas leasing decisions would be consistent with the BLM and Forest Service requirements for leasing decisions as found in 43 CFR Part 3101 and 36 CFR 228.102, respectively.
- 3.15. GD-15: In conjunction with plan evaluation, re-evaluate management zones, required design features and other protective stipulations as new science, information and data regarding the habitats and behavior of the species is obtained. Incorporate these findings as part of plan maintenance.
- 3.16. GD-16: Incorporate required design features (RDFs) as described in Appendix A in the development of project or proposal implementation, reauthorizations or new authorizations and suppression activities.
- 3.17. GD-17: Incorporate best management practices as described in Appendix A, as applicable and appropriate in the design and development of implementation activities and projects.
- 3.18. GD-18: Conduct implementation and project activities consistent with seasonal habitat restrictions described in Appendix B.

**Comment [BER22]:** Paul is compiling.

- 3.19. GD-19: Incorporate appropriate buffers into implementation and project design to avoid and minimize impacts to GRSG described in Appendix C.
- 3.20. GD-20: Consistent with regulations, require a full reclamation bond specific to the site when surface disturbing activities are proposed. Ensure reclamation bonds are sufficient to cover costs that would result in full rehabilitation to restore lost GRSG habitat. Base the reclamation costs on the assumption that contractors for the BLM will perform the work.

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#### **4. Coordination**

- 4.1. CC-1: Collaborate, coordinate and utilize cooperative planning efforts to implement and monitor activities to achieve desired conditions and to maximize the utilization of available funding opportunities. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups and non-governmental organizations.
- 4.2. CC-2: Develop a cooperative MOU between the BLM, Forest Service and State of Idaho to establish the State of Idaho as a cooperating agency during implementation of the final decision. The MOU would identify responsibilities, role and interaction of the BLM, FS and Task Team. Montana BLM will participate as appropriate on Montana's Sage-grouse Oversight Team to facilitate coordinated and implementation of BLM's final decision and Montana's forthcoming sage-grouse conservation strategy.
- 4.3. CC-3: The BLM and Forest Service would consider any recommendations from the Governor of Idaho as a result of evaluation completed by the Sage-Grouse Implementation Task Force.
- 4.4. CC-4: The BLM and Forest Service would coordinate with the State of Idaho and Montana and the Idaho Sage-Grouse Implementation Task Force and Montana Sage-grouse Oversight Team regarding proposed management changes, the implementation of conservation measures, mitigation, and site-specific monitoring, related to adaptive management and livestock grazing (Appendix O).
- 4.5. CC-5: At the state level, BLM and Forest Service would consider recommendations from the Governor in the decision process recognizing that the BLM and Forest Service have the final decision making authority and responsibility on federal lands under their appropriate jurisdiction.
- 4.6. CC-6: At the state level, BLM and Forest Service would coordinate with IDFG, MFWP, USFWS, and other conservation partners in collaborative efforts with adjacent states (Oregon, Nevada, Utah, Montana, Wyoming) in GRSG MZs IV and II to evaluate GRSG habitat and population status and trends within the broader USFWS PACs and make appropriate recommendations for GRSG conservation at broader scales.
- 4.7. CC-7: At the state level, BLM and Forest Service would coordinate with appropriate WAFWA Sage-grouse Technical Committee to develop consistent population and habitat monitoring approaches that facilitate GRSG conservation at the MZ scale.
- 4.8. CC-8: All prescribed burning would be coordinated with state and local air quality agencies to ensure that local air quality is not significantly impacted by BLM and Forest Service activities.

## 5. Greater Sage-Grouse Management Areas

- 5.1. Management Area (MA)-1: Designate five GRSG Conservation Areas within the sub-region to form the geographic basis for achieving population objectives; evaluating the disturbance density and adaptive regulatory triggers; and tailor adaptive management responses. These conservation areas are depicted in Map 1. These areas are referred to as Mountain Valleys, Desert, West Owyhee, Southern and Southwestern Montana Conservation Areas.

### Conservation Area Description:

Mountain Valleys Conservation Area – generally located north of the Snake River Plain, and includes habitat in west-central population area. It extends west from Rexburg, north and west of Highway 33 to Howe, north and west of Highway 33/22 to Arco, north and west of Highway 26/20/93 to Carey, north and west of Highway 20 west to Hill City, north and west of Highway 20 to the Dylan Karaus Road, west to Canyon Creek. Canyon Creek to the confluence with the Snake River form the western boundary.

Desert Conservation Area – located north of the Snake River and south of the Mountain Valleys Conservation Area. It extends from the confluence of Canyon Creek and the Snake River, eastward to Idaho Falls. The Snake River and Henry’s Fork form the eastern boundary.

West Owyhee Conservation Area – located south of the Snake River and west of the Bruneau River.

Southern Conservation Area – located south of the Snake River and east of the Bruneau River, including East Idaho uplands and Bear Lake Plateau, and the Utah portion of the Sawtooth National Forest in Box Elder County.

Southwestern Montana – located in southwestern Montana - encompassing the Dillon and Butte BLM Field Office boundaries.

Additionally, sage-grouse habitats in the Desert and West Owyhee CAs are relatively contiguous, while those in the Mountain Valleys and Southern CAs tend to be more fragmented due to topography, elevational and land use differences.

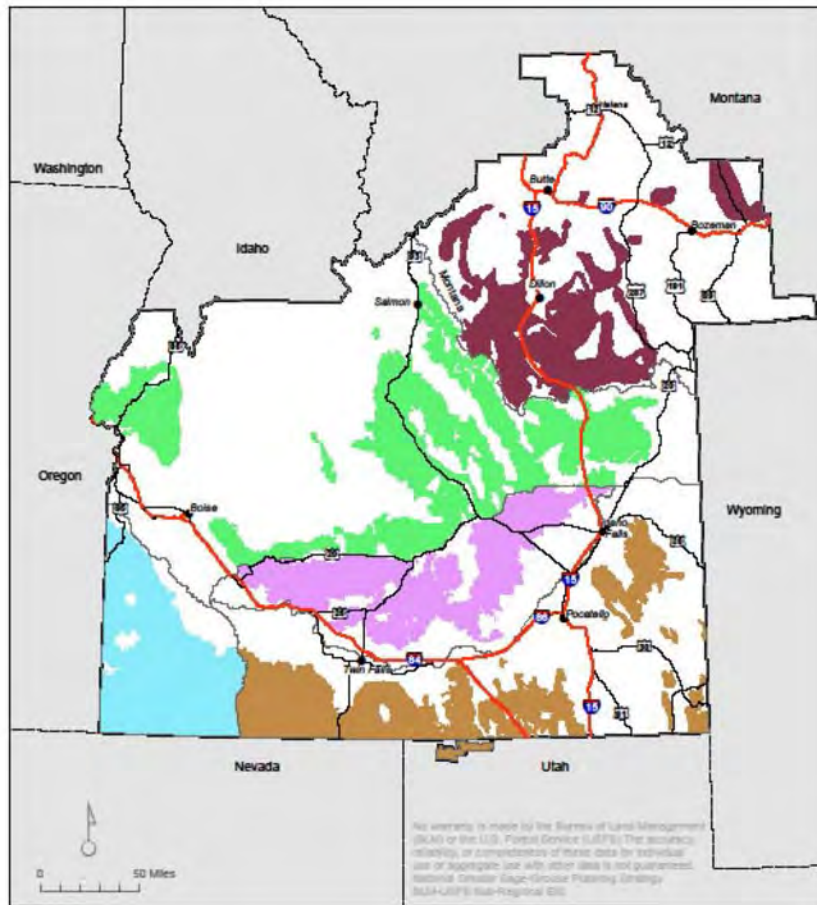
- 5.2. MA-2: Within each Conservation Area (CA) designate GRSG Management Zones: Core, Important and General Management Zones (Map 2). **Core Management Zones (CMZs)** focus on conserving the two key meta-populations in the sub-region. These meta-populations consist of a large aggregation of interconnected breeding subpopulations of GRSG that have the highest likelihood of long-term persistence. The CMZ encompasses areas with the highest conservation value to GRSG, based on the presence of larger leks, habitat extent, important movement and connectivity corridors and winter habitat. Core Management Zones include adequate area to accommodate continuation of existing land uses and landowner activities. **Important Management Zones (IMZs)** contain additional high value habitat and populations that provide a management buffer for the CMZ, connect patches of CMZ. The IMZ encompasses areas of generally moderate to high conservation value habitat and/or populations and in some CAs includes areas beyond those identified by USFWS as necessary to maintain redundant, representative and resilient populations

(Priority Areas for Conservation (PACs)). The IMZs are typically adjacent to CMZs but generally reflect somewhat lower GRSG population status and/or reduced habitat value due to disturbance, habitat fragmentation or other factors. There are no IMZs designated within the Southwestern Montana CA. **General Management Zones (GMZs)** encompass habitat that is outside of CMZs or IMZs. It is generally characterized by more marginal habitat and few, if any, occupied leks or other important seasonal use areas.

- 5.3. MA-3: Annually prioritize Conservation Areas at the state scale considering results of the annual adaptive regulatory trigger evaluations relative to implementation of restoration and mitigation activities.
- 5.4. MA-4: Prioritize activities to protect, enhance and restore GRSG habitats (i.e. suppression activities, fuels management activities, vegetation treatments, invasive species treatments, etc.) first by Conservation Area, if appropriate (CA under adaptive management or at risk of engaging adaptive management), followed by Core Management Zones, then Important Management Zones then General Management Zones within the Conservation Areas. Local priority areas within these zones will be further refined as a result of completing the GRSG Wildfire and Invasive Species Habitat Assessments as described in Appendix D. This could include projects outside GRSG habitat when those projects would provide a benefit to GRSG habitat.
- 5.5. MA-5: The management zone map and biologically significant unit baseline map would be re-evaluated in conjunction with plan evaluation processes (i.e. approximately every 5 years). This re-evaluation could indicate the need to adjust Core, Important or General Management Zones or the habitat baseline. These adjustments could occur upon completion of the appropriate analysis (plan amendment) to review the allocation decisions based on the map.
- 5.6. MA-6: The appropriateness of specific project proposals or management activities within the management zone designations (Core, Important, General) would be assessed individually during project-level NEPA analysis. This evaluation is necessary since designations of Core, Important and General Management Zones were derived at a broad scale with additional refinements relative to boundaries and management consideration; locally GRSG habitat suitability and vegetation characteristics vary.

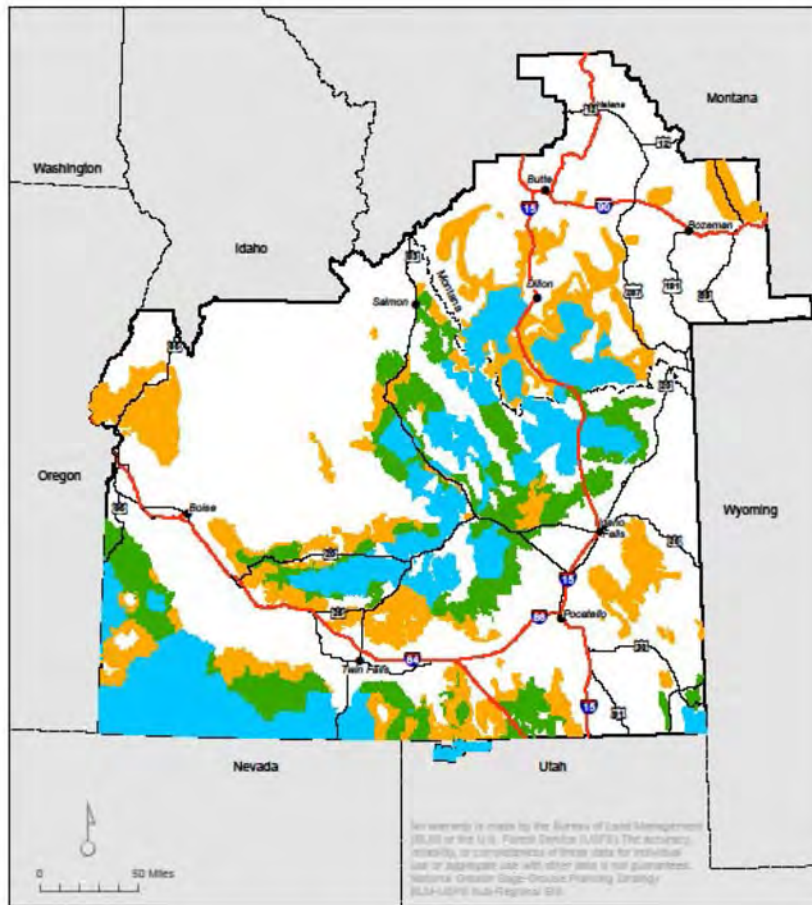
**Comment [BER23]:** From Paul - newly identified habitat use areas that are agreed upon between BLM/FS and IDFG that are outside the boundaries of the FEIS C//G zones, could be managed as "General" during the interim 5 year time frame between map updates?. [This would necessitate a rule set based on telemetry or other verified info showing the area is indeed a seasonal use area and not just a random observation.]

Map 1. Conservation Areas within Idaho and Southwestern Montana Subregion



- |   |                            |
|---|----------------------------|
| <b>Conservation Area with Management Zone</b> | Conservation Area Boundary |
| Idaho Desert Conservation Area                | Analysis Boundary          |
| Idaho Mountain Valleys Conservation Area      |                            |
| Idaho Southern Conservation Area              |                            |
| Idaho West Owyhee Conservation Area           |                            |
| SW Montana Conservation Area                  |                            |

Map 2. Management Zones within Idaho and Southwestern Montana Subregion



- Management Zone**
- Core
  - Important
  - General
  - Analysis Boundary

## 6. Adaptive Management

- 6.1. Adaptive Management (AM)-1: Idaho: Use hard and soft population and habitat triggers, evaluated within a Conservation Area, to determine an appropriate management response.
- 6.2. AM-2: Utilize monitoring information collected through the Monitoring Framework Plan (Appendix E) to determine when adaptive regulatory triggers have been met.
- 6.3. AM-3: Idaho: BLM and Forest Service would maintain GRSG habitat information, through use of the Key Habitat map or latest sagebrush/vegetation map, which would be used to track and identify habitat changes to assess the habitat trigger in the adaptive management approach. Key habitat map updates are made each winter by BLM in coordination with the FS and Idaho Department of Fish and Game (IDFG), using the process described in Appendix F.
- 6.4. AM-4: BLM and Forest Service would utilize population information collected and maintained by the Idaho Department of Fish and Game to track and identify population changes to assess the population trigger in the adaptive management approach...
- 6.5. AM-5: Twice each year the applicable monitoring information would be reviewed to determine if any adaptive management criteria have been met.
- 6.6. AM-6: Adaptive regulatory triggers would be individually calculated across all ownerships within the biologically significant units (BSU). The BSU is defined as the nesting and wintering habitat within Core and Important Management Zones within a Conservation Area.
- 6.7. AM-7: Adaptive Regulatory Criteria for Hard Habitat Triggers are defined as:  
A 20 percent combined loss of nesting and/or wintering habitat within CMZ within a CA compared to the 2011 biologically significant unit (BSU) baseline (Map 3) (The BSU is defined as the nesting and wintering habitat within Core and Important Management Zones within a Conservation Area, inclusive of all ownerships and is used in the evaluation of the adaptive regulatory triggers and the anthropogenic disturbance threshold); or  
A 20 percent combined loss of nesting and/or wintering habitat within IMZ within a CA compared to the 2011 BSU baseline.
- 6.8. AM-8: Adaptive Regulatory Criteria for Soft Habitat Triggers are defined as:  
A 10 percent combined loss of nesting and/or wintering habitat within CMZ within a CA compared to the 2011 BSU baseline; or  
A 10 percent combined loss of nesting and/or wintering habitat within IMZ within a CA compared to the 2011 BSU baseline.
- 6.9. AM-9: Adaptive Regulatory Criteria for Hard Population Triggers are defined as:  
A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within CMZ within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline; or  
A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within IMZ within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline.
- 6.10. AM-10: Adaptive Regulatory Criteria for Soft Population Triggers are defined as:  
A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within CMZ within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011; or

**Comment [BER24]:** Describe Project Level Adjustments.

**Comment [BER25]:** From Paul - Confirm if this should read "average maximum" (avg max no. per lek) or is it the total max number of birds. Important distinction.

A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within IMZ within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011.

- 6.11. AM-11: When any of the Adaptive Regulatory Criteria for Soft Triggers have been met then the Implementation Team would engage to identify implementation level actions that may be appropriate to consider.
- 6.12. AM-12: When any of the Adaptive Regulatory Criteria for Soft Triggers have been met the Implementation Team would evaluate causal factors and recommend additional potential implementation level activities Appendix G.
- 6.13. AM-13: When any of the Adaptive Regulatory Criteria for Hard Triggers have been met due to loss of habitat then CMZ management actions would be applied to the IMZ within that CA.
- 6.14. AM-14: If an adaptive regulatory trigger is tripped and livestock grazing is identified as a probable limiting factor then adjustments would follow the Adaptive Grazing Management Response described in Appendix G.
- 6.15. AM-15: Remove any adaptive management response when the habitat or population information shows a return to or an exceedance of baseline values within the associated CA.
- 6.16. **Montana Adaptive Management:**

**Comment [BER26]:** John Carlson to provide template of language.

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## 7. Anthropogenic Disturbance

- 7.1. Anthropogenic Disturbance (AD)-1: Limit anthropogenic disturbance to 3 percent as calculated within the biologically significant unit (BSU) (Map 3). The BSU is defined as the nesting and wintering habitat within Core and Important Management Zones within a Conservation Area, inclusive of all ownerships. Anthropogenic disturbance excludes habitat disturbance from wildfire and includes activities described in Table X. For Idaho this disturbance is measured by direct footprint or by ROW width for linear features. For Montana this disturbance is measured utilizing the Disturbance Density Calculation Tool process described in Appendix I.
- 7.2. AD-2: New anthropogenic disturbances within winter and nesting habitat within Core or Important management zones within a CA where the disturbance threshold is already exceeded from any source or where the proposed development would result in the threshold being exceeded would not be allowed until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights).
- 7.3. AD-3: Core Management Zone: Anthropogenic Disturbance Exception Criteria – in addition to the Core and Important Management Zone Anthropogenic Disturbance Development Criteria (AD-4), the following criteria must all be met in the screening and assessment process:
  - a. The population trend for the GRSG within the associated Conservation Area is stable or increasing over a three-year period and the population levels are not currently engaging the adaptive management triggers (this applies strictly to new authorizations; renewals and amendments of existing authorizations would not be subject to this criteria when it can be shown that long-term impacts from those renewals or amendments would be substantially the same as the existing development);
  - b. The development with associated mitigation would not result in a net loss of GRSG habitat and would provide a net conservation benefit of the respective Core Management Zone;
  - c. The project would not likely result in a net loss of GRSG habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant CA;
  - d. The project is developed pursuant to a valid existing authorization;
  - e. The project is an incremental upgrade/capacity increase of existing development;
  - f. Cannot be reasonably accomplished outside of the Core Management Zone;
  - g. Can be co-located within the footprint of existing infrastructure (proposed actions would not increase the 2011 authorized footprint and associated impacts more than fifty percent (50%), depending on industry practice.
  - h. Development would follow the required design features (RDF) and best management practices (BMPs) as described in Appendix A;
  - i. The project would not exceed the disturbance threshold (AD-1).
  - j. The project has been reviewed by the State Implementation Team and recommended for consideration by the Idaho Governor.
- 7.4. AD-4: Core and Important Management Zone: Anthropogenic Disturbance Development Criteria – the following criteria must be met in the screening and assessment process:
  - a. The project cannot reasonably be achieved, technically or economically, outside of this management zone; and



- b. The project is co-located within the footprint for existing infrastructure, to the extent practicable. In the event co-location is not practicable, the siting should best reduce cumulative impacts and/or impacts on other high value natural, cultural, or societal resources; and
- c. The project does not result in a net loss of GRSG habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant CA; and
- d. The project design mitigates unavoidable impacts through appropriate compensatory mitigation; and
- e. The project complies with the applicable RDFs and BMPs as described in Appendix A.
- f. The project would not exceed the disturbance threshold (AD-1).

**7.5. AD-5: Co-locating new infrastructure within existing ROWs and maintaining and upgrading ROWs is preferred over the creation of new ROWs or the construction of new facilities in all management zones. Colocation for various activities is defined as:**

Communication Sites – The installation of new equipment/facilities on or within or adjacent to existing authorized equipment/facilities or within a communication site boundary as designated in the Communication Site Plan.

Electrical Lines – Installation of new rights-of-way (ROWs) adjacent to current ROWs boundaries, not necessarily placed on the same power poles.

Other Rights-of-Way – The installation of new rights-of-way (ROWs) within the existing footprint of an approved ROW boundary or adjacent to an approved ROW boundary.

Designated Corridors – The installation of new rights-of-way within the existing corridor or adjacent to the existing corridor.

**7.6. AD-6: Construction activities and other short-term anthropogenic disturbances would be carried out subject to seasonal and timing restrictions Appendix B.**

Table X

Datasets as Described in the Monitoring Framework <sup>3</sup>	Additional Local Datasets (need definitions)
Oil and Gas Wells and Development Facilities	Underground Pipelines
Coal Mines	Coal Bed Methane Ponds
Wind Towers	Meteorological Towers
Solar Fields	Nuclear Energy Facilities
Geothermal Development Facilities	Airports
Active Locatable, Leasable and Saleable Developments	Military Ranges (ground based?)
Roads	Hydropower plants
Railroads	Recreation Areas
Powerlines	

<sup>3</sup> As described in the Monitoring Framework

Communication Towers	
Other Vertical Structures	
Other Developed Rights-of-way	

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## **8. Mitigation**

- 8.1.** Mitigation (MIT)-1: BLM and USFS would establish an inter-agency GRSG Conservation Board at the state level (both Idaho and Montana) to oversee GRSG Conservation.
- 8.2.** MIT-2: The BLM and USFS, in coordination with the GRSG Conservation Board would develop a State Mitigation Strategy. In Idaho this strategy would be consistent with the Idaho Mitigation Framework (Appendix J).
- 8.3.** MIT-3: Mitigate impacts from anthropogenic developments (Appendix H) to GRSG habitats by first avoidance of impacts, minimizing impacts and then compensating for impacts.
- 8.4.** MIT-4: Mitigate anthropogenic development (Appendix H) impacts to CMZs to a no net loss standard (Appendix K) through application of appropriate mitigation in accordance with the Mitigation Framework (Appendix L), referred to as no unmitigated loss.
- 8.5.** MIT-5: Mitigate anthropogenic development (Appendix H) impacts to GRSG habitat through application of appropriate mitigation in accordance with the Mitigation Framework (Appendix L).

## **9. Wildfire Preparedness/Prevention**

- 9.1. Wildfire Preparedness (WFP)-1: Support development and implementation of Rangeland Fire Protection Associations (RFPAs) in coordination with the State of Idaho.
- 9.2. WFP-2: Develop a consistent approach to fire restrictions within GRSG habitat through the existing coordinated inter-agency approach to fire restrictions based upon National Fire Danger Rating System thresholds (fuel conditions, drought conditions, and predicted weather patterns).
- 9.3. WFP-3: Annually incorporate into existing fire management plans results and updates from the Wildfire and Invasive Species Habitat Assessments (FIAT Assessments) described in Appendix D, to communicate/explain the resource value of GRSG habitat, including fire prevention messages and actions to reduce human-caused ignitions.
- 9.4. WFP-4: Continue to participate with the Wildland Fire Leadership Council, a cooperative, interagency organization dedicated to achieving consistent implementation of the goals, actions, and policies in the National Fire Plan and the Federal Wildland Fire Management Policy.
- 9.5. WFP-5: Continue annual coordination meetings held between cooperating agencies that have fire suppression responsibilities. Incorporate Rangeland Fire Protection Associations and other stakeholders into this coordination. Discuss priority suppression areas and distribute maps showing priority suppression areas at both the Conservation Area and the local office levels as based on the adaptive management strategy and FIAT Assessments.
- 9.6. WFP-6: Ensure firefighter personnel receive annual orientation regarding GRSG habitat and sagebrush management issues as related to wildfire suppression.
- 9.7. WFP-7: As part of the FIAT Assessments, identify roads, trails, and recreational use areas with high frequency of human caused fires within or adjacent to the Core or Important Management Zones. Consider these areas during annual fire restriction evaluations, and as appropriate, through site specific management.
- 9.8. WFP-8: Coordinate with Federal, State and local jurisdictions on fire and litter prevention programs to reduce human caused ignitions.
- 9.9. WFP-9: Implement activities identified within the FIAT Assessments.

## **10. Wildfire Suppression**

- 10.1.** WFS-1: Complete Wildland Fire and Invasive Species Assessments (FIAT Assessments) as described within Appendix D and incorporate results into appropriate Fire Management Plans as they are completed. FIAT Assessments are interdisciplinary evaluations of the threats posed by wildfire and invasive species, as well as identification of priority areas/treatment opportunities for fuels management, fire management, and restoration. These FIAT Assessments identify priority areas and describe strategies for fuels management, suppression and restoration activities.
- 10.2.** WFS-2: As part of the FIAT Assessments incorporate a wildfire response time analysis focusing on response time to identified priority areas within Core and Important Management Zones or on those fires that have the potential to impact Core and Important Management Zones. Incorporate findings into Unit Initial Attack program
- 10.3.** WFS-3: As part of the FIAT Assessment incorporate a water capacity analysis for suppression purposes, including potential private water sources. Provide water availability to respond to fire in or threatening CMZ and IMZ during initial attack.
- 10.4.** WFS-4: During high fire danger conditions, stage initial attack and secure additional resources closer to priority areas identified in the FIAT Assessments, based on anticipated fires and weather conditions, with particular consideration of the West Owyhee, Southern and Desert Conservation Areas to ensure quicker response times in or near GRSG habitat.
- 10.5.** WFS-5: Utilize a full range of fire management strategies and tactics through strategic wildfire suppression planning consistent with appropriate management response and within acceptable risk levels, to achieve resource objectives for GRSG habitat consistent with land use plan direction. Utilizing both direct and indirect attack as appropriate to limit the overall amount of GRSG habitat burned. This could include suppressing fires in intact sagebrush habitats; limiting fire growth in General Management Zones when suppression resources are available or managing wildfire for resource benefit in areas of conifer (juniper) encroachment.
- 10.6.** WFS-6: Suppression priorities: Firefighter and public safety followed by property are the highest priority for protection during suppression activities. Maintaining GRSG habitat will be prioritized immediately after human life and property, commensurate with threatened and endangered species habitat or other critical habitats to be protected.
- 10.7.** WFS-7: Ensure close coordination with federal and state firefighters including the Rangeland Fire Protection Associations during suppression activities.

## **11. Fuels Management**

- 11.1.** FM-1: Design and implement fuels treatments that would reduce the potential start and spread of unwanted wildfires and provide anchor points or control lines for the containment of wildfires during suppression activities with an emphasis on maintaining, protecting, and expanding sagebrush ecosystems and successfully rehabilitated areas and strategically and effectively reduce wildfire threats in the greatest area.
- 11.2.** FM-2: Enhance (or maintain/retain) sagebrush canopy cover and community structure to match expected potential for the ecological site and consistent with GRSG habitat objectives unless fuels management objectives requires additional reduction in sagebrush cover to meet strategic protection of GRSG habitat. Closely evaluate the benefits of the fuel management treatments against the additional loss of sagebrush cover on the local landscape in the NEPA process.
- 11.3.** FM-3: Apply appropriate seasonal restrictions for implementing fuels management treatments according to the type of seasonal habitats present. Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around and/or in the winter range and would protect, maintain, increase, or enhance winter range habitat quality. Ensure chemical applications are utilized where they would assist in success of fuels treatments. Strategically place treatments on a landscape scale to prevent fire from spreading into Core Management Zones or WUI.
- 11.4.** FM-4: Develop a fuels continuity and management strategy to expand, enhance, maintain and protect GRSG habitat informed by the FIAT Assessments completed as described in Appendix D.
- 11.5.** FM-5: When developing the fuels management strategy as part of the FIAT Assessment described in Appendix D consider up-to-date fuels profiles; land use plan direction; current and potential habitat fragmentation; sagebrush and GRSG ecological factors; active vegetation management steps to provide critical breaks in fuel continuity where appropriate; incorporate a comparative risk analysis with regard to the risk of increased habitat fragmentation from a proposed action versus the risk of large scale fragmentation posed by wildfires if the action is not taken.
- 11.6.** FM-6: Fuel treatments will be designed though an interdisciplinary process to expand, enhance, maintain, and protect GRSG habitat which considers a full range of fuel reduction techniques, including: grazing, targeted grazing, prescribed fire, chemical, biological and mechanical treatments.
- 11.7.** FM-7: Existing and proposed linear ROWs could be considered for use and maintenance as vegetated fuel breaks in appropriate areas.
- 11.8.** FM-8: Fuel breaks would incorporate existing vegetation treatments (seedings) or be located adjacent to existing linear disturbance areas where appropriate. Fuel breaks should be placed in areas with the greatest likelihood of compartmentalizing a fire and/or to foster suppression options to protect existing intact habitat.
- 11.9.** FM-9: Strategically pre-treat areas to reduce fine fuels.
- 11.10.** FM-10: Protect seeding efforts from subsequent fire events.
- 11.11.** FM-11: Targeted grazing as a fuels treatment to adjust the vegetation conditions to reduce the potential start and spread of unwanted wildfires may be implemented within existing grazing authorizations if feasible such as through temporary non-renewable authorizations, or through contracts, agreements or other appropriate means separate from existing grazing authorizations and permits.

- 11.12. FM-12: Targeted grazing to achieve fuels management objectives should conform to the following criteria:
- Targeted grazing should be implemented strategically on the landscape, and directly involve the minimum footprint and grazing intensity required to meet fuels management objectives.
  - Allow conformance to the applicable Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho or Montana) at the assessment scale.
  - Where feasible and applicable coordinate with the grazing permittee to strategically reduce fuels through livestock management within the Mandatory Terms and Conditions of the applicable grazing authorizations
- 11.13. FM-13: Prioritize the use of native seeds for fuels management treatment based on availability, adaptation (site potential), and probability of success. Where probability of success or native seed availability is low or non-economical, nonnative seeds may be used to meet GRSG habitat objectives to trend toward restoring the fire regime. When reseeding, use fire resistant native and nonnative species, as appropriate, to provide for fuel breaks.
- 11.14. FM-14: Maintain effectiveness of fuels projects to ensure long-term success, including persistence of seeded species and/or other treatment components while maintaining the integrity of adjacent vegetation.

**12. Wildfire Restoration/Rehabilitation – Emergency Stabilization and Rehabilitation**

- 12.1. ESR-1: Utilize the findings and Restoration/Rehabilitation Strategy developed as part of the FIAT Assessment process described in Appendix D to determine if rehabilitation actions are needed, based on ecological potential, and direct emergency stabilization and rehabilitation (ESR) (BLM) or Burned Area Emergency Restoration (BAER) (FS) actions after fire.
- 12.2. ESR-2: Incorporate GRSG Habitat Management Objectives into ESR/BAER plans based on site potential and in accordance with the Restoration/Rehabilitation Strategy developed as a result of the FIAT Assessments.
- 12.3. ESR-3: Adjust management activities, as appropriate to ensure successful establishment of vegetation from ESR and rehabilitation informed through the evaluation of measurable groundcover and vegetation objectives such as plant vigor, seed production and growing season conditions.
- 12.4. ESR-4: Adjust, as appropriate, livestock management on adjacent unburned areas to mitigate the effect of the burn on local GRSG populations.



### 13. Habitat Restoration and Vegetation Management

- 13.1. VEG-1: Implement habitat rehabilitation or restoration projects in areas that have potential to improve GRSG habitat using a full array of treatment activities as appropriate, including chemical, mechanical and seeding treatments.
- 13.2. VEG-2: Implement vegetation rehabilitation or manipulation projects to enhance sagebrush cover or to promote diverse and healthy grass and forb understory to achieve the greatest improvement in GRSG habitat based on FIAT Assessments, HAF assessments, other vegetative assessment data and local, site specific factors that indicate sagebrush canopy cover or herbaceous conditions do not meet habitat management objectives (i.e. is minimal or exceeds optimal characteristics). This may necessitate the use of prescribed fire as a site preparation technique to remove annual grass residual growth prior to the use of herbicides in the restoration of certain lower elevation sites (e.g., Wyoming big sagebrush) but such efforts will be carefully planned and coordinated to minimize impacts to sage-grouse seasonal habitats.
- 13.3. VEG-3: Require use of native seeds for restoration based on availability, adaptation (ecological site potential), and probability of success (Richards et al. 1998). Non-native seeds may be used as long as they support GRSG habitat objectives (Pyke 2011) to increase probability of success, when adapted seed availability is low or to compete with invasive species especially on harsher sites.
- 13.4. VEG-4: Implement management changes in restoration and rehabilitation areas, as necessary, to maintain suitable GRSG habitat, improve unsuitable GRSG habitat and to ensure long-term persistence of improved GRSG habitat (Eiswerth and Shonkwiler 2006). Management changes could be considered during livestock grazing permit renewals, travel management planning, and renewal or reauthorization of rights-of-way.
- 13.5. VEG-5: Consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) to provide a reliable source of locally adapted seed to use during rehabilitation and restoration activities.
- 13.6. VEG-6: Allocate use of native seed to GRSG or ESA listed species habitat in years when preferred native seed is in short supply. This may require reallocation of native seed from ESR (BLM) and/or BAER (Forest Service) projects outside of Core or Important Management Zones to those inside it. Where probability of success or native seed availability is low, nonnative seeds may be used as long as they meet GRSG habitat conservation objectives (Pyke 2011). Re-establishment of appropriate sagebrush species/subspecies and important understory plants, relative to site potential, shall be the highest priority for rehabilitation efforts.
- 13.7. VEG-7: During land health assessments evaluate the compatibility of existing nonnative seedings for GRSG habitat to keep as a component of a grazing system, development of a forage reserve, or to be used as a fuelbreak (Davies et al. 2011) or during restoration development. If nonnative seedings do not contribute to a grazing system, are not suitable for a forage reserve, and are not suitable fuelbreaks, evaluate the nonnative seedings in and adjacent to CMZ to determine if they should be diversified with or converted to native grasses, forbs, and shrubs, including sagebrush.
- 13.8. VEG-8: Utilize conifer (juniper) removal treatments to reduce the extent of conifer encroachment areas. Refrain from using prescribed fire and conducting removal

projects in old-growth juniper stands. Old-growth juniper trees are characterized by rounded tops and spreading canopies, often containing dead limbs and/or spike tops, large branches near the base of the tree, as well as furrowed, fibrous bark, and are typically host to arboreal lichens. Leader growth in the upper quarter of the tree is usually less than one inch. These trees are generally distributed on rock outcrop or rubble land soils, or other soils with coarse fragments in the soil-surface and/or slopes over 12-25%, where juniper vegetation type is the climax plant community (IDFG 2000; Miller et al 2005; USDI and USGS 2007).

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## **14. Invasive Species**

- 14.1. Invasive Species (INV)-1: Incorporate results of the FIAT Assessments into projects and activities addressing invasive species.
- 14.2. INV-2: Implement noxious weed and invasive species control using integrated weed management actions per national guidance and local weed management plans for Cooperative Weed Management Areas in cooperation with State and Federal agencies, affected counties, and adjoining private lands owners.
- 14.3. INV-3: Conduct integrated weed management actions for noxious and invasive weed populations that are impacting or threatening GRSG habitat quality using a variety of eradication and control techniques including chemical, mechanical and other appropriate means.
- 14.4. INV-4: Require project proponent to ensure that treatments of noxious weeds and invasive species on disturbed project construction areas are completed for at least 3 years.

## **15. Lands and Realty / Infrastructure**

- 15.1.** Lands and Realty (LR)-1: Core: Designate and manage Core Management Zones as ROW avoidance areas subject to RDFs, BMPs, buffers and seasonal timing restrictions (Appendix A, B & C). Important: Designate and manage Important Management Zones as ROW avoidance areas subject to RDFs, BMPs, buffers and seasonal timing restrictions. General: Designate and manage General Management Zones as open with proposals subject to RDFs, BMPs, buffers and seasonal timing restrictions.
- 15.2.** LR-2: Core: Designate and manage Core Management Zones as exclusion areas for utility scale (20 MW) Wind and Solar testing and development, nuclear and hydropower energy development. Important: Designate and manage Important Management Zones as avoidance areas for Wind and Solar testing and development, nuclear and hydropower development. General: Designate and manage General Management Zones as open for Wind and Solar testing and development and nuclear and hydropower development subject to RDFs, BMPs, buffers and seasonal timing restrictions.
- 15.3.** LR-3: Core: Development of commercial service airports and facilities (as defined by FAA 2014 – publically owned airports that have at least 2,500 passenger boardings each calendar year and receive scheduled passenger service) would not be allowed within Core Management Zones. Important and General Management Zones are Avoidance and Open respectively for these types of ROW applications as described in LR-1.
- 15.4.** LR-4: Core: Development of new landfills would not be allowed within Core Management Zones. Important and General Management Zones are Avoidance and Open respectively for these types of ROW applications as described in LR-1.
- 15.5.** LR-5: Core Management Zones: Rights-of-way for development of new or amended ROWs and land use authorizations, not excluded, would only be considered when consistent with the Anthropogenic Disturbance Exception Criteria (AD-3). Important: Rights-of-way for development of new or amended ROWs and land use authorizations, not excluded, could be considered consistent with the Important Management Zones Anthropogenic Disturbance Development Criteria. (AD-4). General: New ROW and land use authorizations could be considered.
- 15.6.** LR-6: If the project is an incremental upgrade/capacity increase of existing development - the existing transmission line must be removed within a specified amount of time after the new line is installed and energized.
- 15.7.** LR-7: Existing designated corridors, including Section 368 Corridors, will remain Open (subject to the ongoing settlement agreement).
- 15.8.** LR-8: Process unauthorized use. If the use is subsequently authorized, it would be authorized consistent with direction for the Management Zones within which it is located and the RDFs, BMPs, buffers and seasonal timing restrictions. If the use is not subsequently authorized the site would be reclaimed by removing these features and restoring the habitat.
- 15.9.** LR-9: Land use authorizations that are temporary in nature would be subject to seasonal or timing restrictions and mitigation requirements regarding habitat loss as needed.
- 15.10.** LR-10: New ROW applications for water facilities (ditches, canals, pipelines), or amendments to existing water facilities which include additional structures to improve fish passage or benefits to fisheries (new diversions, fish screens) would be

- allowed on a case-by-case bases subject to RDFs and BMPs to reduce impacts to GRSG habitat and mitigation requirements regarding GRSG habitat loss as needed.
- 15.11. LR-11: When a ROW grant expires, is relinquished, or terminated, the lease holder would be required to reclaim the site by removing overhead lines and other infrastructure and to eliminate avian predator nesting opportunities provided by anthropogenic development on public lands associated with the now void ROW grant (e.g., remove powerline and communication facilities no longer in service).
- 15.12. LR-12: Work with ROW holders to retrofit existing towers with perch deterrents or other anti-perching devices, where appropriate, to limit GRSG predation.
- 15.13. LR-13: Land tenure adjustments would be subject to the following disposal, exchange, and acquisition criteria, which include retaining lands with GRSG habitat. Retention of areas with GRSG would reduce the likelihood of habitat conversion to agriculture, urbanization, or other uses that would remove sagebrush habitat and potentially impact sensitive plants. Criteria:
- a. Lands within Core and Important Management Zones would not be available for disposal (Appendix M).
  - b. Acquire habitat within Core and Important Management Zones, when possible (i.e. willing landowner), and retain ownership of habitat within all Zones, except if a land exchange would allow for additional or more contiguous federal ownership patterns.
  - c. Lands within Core and Important Management Zones would be retained unless exchange of those lands would increase the extent or provide for connectivity of Core or Important Management Zones.
  - d. Evaluate potential land exchanges containing historically low-quality GRSG habitat that may be too costly to restore in exchange for lands of higher quality habitat, lands that connect seasonal GRSG habitats or lands providing for threatened and endangered species. These potential exchanges should lead to an increase in the extent or continuity of or provide for improved connectivity of Core Management Zones. Higher priority will be given to exchanges for those in-tact areas of sagebrush that will contribute to the expansion of sagebrush areas within Core Management Zones currently in public ownership. Lower priority would be given to other lands that would promote enhancement in the Core and Important Management Zones.
  - e. Identify lands for acquisition that increase the extent of or provide for connectivity of Core Management Zones.

## 16. Minerals

### 16.1. Fluid Minerals

- 16.1.1.** Fluid Minerals (FLM)-1: Idaho: Areas within Core Management Zones with no or low potential for fluid mineral development (oil and gas or geothermal) would be closed. Areas within Core Management Zones with moderate to high potential for development and Important Management Zones would be open to mineral leasing and development subject to no surface occupancy, in accordance with the Anthropogenic Disturbance Exceptions (Core – AD-3) and the Anthropogenic Disturbance Development Criteria (Important – AD-4) subject to RDFs, BMPs, buffers, timing restrictions and standard stipulations. General Management Zones would be open to mineral leasing and development subject to CSU which includes RDFs, BMPs, buffers, seasonal timing restrictions and standard stipulations. Montana: Areas within Core Management Zones would be open to leasing subject to no surface occupancy. No waivers, exceptions or modifications would be allowed unless approved by the State Director. General Management Zones would be open to leasing subject to CSU which includes RDFs, BMPs, buffers, seasonal timing restrictions and standard stipulations.
- 16.1.2.** FLM-2: Core Management Zones: Waivers, exemptions or modifications to the NSO stipulation could be considered upon recommendation from the Governor through the Implementation Task Force during the federal site-specific NEPA analysis based on Core Management Zone Anthropogenic Disturbance Exception Criteria (AD-3). Important Management Zones: Waivers, exceptions or modifications to the NSO stipulation could be considered upon recommendation from the Governor through the Implementation Task Force during the federal site-specific NEPA analysis based on the Important Management Zone Anthropogenic Disturbance Development Criteria (AD-4). In the event a waiver, exception or modification were allowed development would still be subject to CSU which includes RDFs, BMPs, buffers, seasonal timing restrictions and standard stipulations.

#### **Waivers, Exceptions and Modifications (WEMs)** (Source IM-2008-032)

A waiver is a permanent exemption from a lease stipulation, the stipulation would no longer apply anywhere within the lease. Waivers require a 30-day public review and are approved and signed by the State Director.

An exception is a one-time exemption for a particular site within the lease; exceptions are determined on a case-by-case basis; the stipulation continues to apply to all other sites within the lease. An exception is a limited type of waiver.

A modification is a change to the provisions of a lease stipulation, either temporarily or for the term of the lease. Depending on the specific modification, the stipulation may or may not apply to all sites within the lease to which the restrictive criteria are applied.

- 16.1.3.** FLM-3: Incorporate required design features, best management practices appropriate to the management area, buffers and seasonal timing restrictions as conditions of approval into any post-lease activities.
- 16.1.4.** FLM-4: Complete a Master Development Plan on leases where a producing field is proposed to be developed.
- 16.1.5.** FLM-5: Encourage unitization when deemed necessary for proper development and operation of an area (with strong oversight and monitoring). The unitization must be

designed in a manner to minimize adverse impacts on GRSG according to the Federal Lease Form, 3100-11, Sections 4 and 6.

**16.2. Unleased Fluid Minerals**

- 16.2.1. FLM-6: Allow temporary geophysical exploration, subject to site-specific RDFs, BMPs, buffers, seasonal restrictions, and daily timing restrictions.
- 16.2.2. FLM-7: Parcels nominated for lease in Core or Important Management Zones would be evaluated to determine whether they meet the Anthropogenic Disturbance Exception (AD-3 for CMZ) or Anthropogenic Disturbance Development Criteria (AD-4) for IMZ, prior to lease offering. Parcels which do not meet the criteria would not be offered for lease.

**Comment [BER27]:** Does this apply to Core, Important or General? Is it closed to this type of use when it is closed to the development?

**16.3. Locatable Minerals**

- 16.3.1. Locatable Minerals (LOC)-1: Lands would remain open to locatable mineral entry in all management zones.
- 16.3.2. LOC-2: Apply reasonable and appropriate Conditions of Approval to prevent unnecessary or undue degradation of GRSG habitat when a Plan of Operations is submitted for BLM or FS approval, in accordance with 43 CFR 3809.411(d)(2) (or 36 CFR 228.5(a)(3) on National Forest System lands).

**16.4. Salable Minerals**

- 16.4.1. Salable Minerals (SAL)-1: Core: No new site authorizations would be approved. Important: New site authorizations could be considered consistent with the Anthropogenic Disturbance Development Criteria (AD-4) subject to RDFs, BMPs, buffers and seasonal timing restrictions. Sales from existing community pits within CMZ and IMZ would be subject to seasonal timing restrictions. General: Open to new site authorizations subject to RDFs, buffers and seasonal timing restrictions. Existing sites Open to new sales subject to seasonal timing restrictions.
- 16.4.2. SAL-2: Restore salable mineral pits no longer in use to meet GRSG habitat management objectives.
- 16.4.3. SAL-3: Require reclamation bonding that would require restoration of GRSG habitat on new site authorizations for mineral material pits in IMZ (this would not apply to free use permits issued to a government entity such as a county road district, but would apply to non-profit entities).

**Comment [BER28]:** From Paul - But what if we can show minimal issue such as far from leks, can moderate disturbance in lek/nest season etc. with seasonal or timing restrictions? See buffer table ideas.

**16.5. Non-Energy Solid Mineral Leasable Minerals**

- 16.5.1. Non Energy Leasables (NEL)-1: Core and Important Management Zones: Areas within Know Phosphate Leasing Areas (KPLAs) will remain open to leasing. CMZ areas outside KPLAs are closed to leasing and prospecting. IMZ areas outside of KPLAs are open to leasing in accordance to the Anthropogenic Disturbance Development Criteria (AD-4) subject to the anthropogenic disturbance cap (AD-1), RDFs, BMPs, buffers and seasonal timing restrictions. Exceptions may be made for lease modifications and fringe leases where valid existing rights may be affected. General Management Zones: Lands are available for leasing, exploration activities and initial mine development subject to RDFs, BMPs, buffers, timing restrictions (seasonal and daily) and standard stipulations.
- 16.5.2. NEL-2: Require seasonal and daily timing restrictions in undeveloped non-energy mineral leases when exploration activities or initial mine development is proposed, as appropriate.
- 16.5.3. NEL-3: Include RDFs as conditions of approval to mine plans in undeveloped non-energy mineral leases.

**Comment [BER29]:** From Paul - Verify use of "administratively unavailable" for Important, per Buffer table and discussion with Karen Porter in May.

**16.6. Mineral Split Estate**

- 16.6.1.** Mineral Split Estate (MSE)-1: In coordination with surface land owner, apply stipulations, conservation measures, and design features consistent with those applied to BLM- and Forest Service-administered lands in the management zone where the federal government owns the mineral estate and the surface is non-federal ownership.
- 16.6.2.** MSE-2: Recommend to the state regulatory entity to apply a timing restriction stipulation, COAs, and buffer restricts around occupied leks, when concurring to the approval of authorizations for mineral-related surface disturbance on lands in GRSG habitat where the federal government owns the surface and the mineral estate is in non-federal ownership.
- 16.6.3.** In PPMA, where the federal government owns the mineral estate and the surface is in non-federal ownership, apply the conservation measures applied on public lands.
- 16.6.4.** Same as Alternative D.
- 16.6.5.** In PPMA, where the federal government owns the surface, and the mineral estate is in non-federal ownership, the RDFs identified in Appendix J would be applied to surface developments, unless at least one of the following can be demonstrated in the NEPA analyses associated with the specific project:
- 16.6.6.** • A specific design feature is documented to not be applicable to the site-specific conditions of the project/activity;
  - 16.6.7.** • A proposed design feature or BMP is determined to provide equal or better protection for GRSG or its habitat;
  - 16.6.8.** • Analyses conclude that following a specific feature will provide no more protection to GRSG or its habitat than not following it, for the specific project being proposed.



## 17. Range Management/Livestock Grazing

- 17.1. Range Management (RM)-1: Continue to make GRSG habitat available for livestock grazing. Active AUMs for livestock grazing would remain the same, though the number of AUMs available on an allotment may be adjusted based on site-specific conditions to meet management objectives during term permit renewals, AMP development, or other appropriate implementation planning. Additionally, temporary adjustments can be made annually to livestock numbers, the number of AUMs, season of use in accordance with applicable regulations.
- 17.2. RM-2: Prioritize BLM land health assessments and processing of BLM grazing permits consistent with management zone prioritization (MA-4), unless other higher priority considerations exist such as threatened, endangered and proposed species habitat that livestock grazing could affect. Where possible, conduct land health assessments at the watershed, or other meaningful landscape-scale.
- 17.3. RM-3: Where opportunities exist, coordinate with other land managers to encourage livestock operations that utilize mixed federal, private and/or state land to be managed at the landscape scale to benefit GRSG and their habitat across land ownerships.
- 17.4. RM-4: CMZ & IMZ: During the land health assessment process, identify the type(s) of seasonal habitat the assessed areas are capable of supporting. Utilize the habitat assessment framework, (Stiver et al. 2014 as amended/replaced) or other BLM or Forest Service approved methodology, in accordance with current policy and guidance to determine whether vegetation structure, condition and composition are meeting GRSG habitat objectives including riparian and lentic areas (HM-OBJ-2; Table 2). Use appropriate Ecological Site Descriptions, reference sheets and state and transition models to inform desired habitat conditions and expected responses to management changes for the land unit being assessed.
- 17.5. RM-5: When modifying grazing management, analyze indirect effects to habitat, including changes in fuel loading and wildfire behavior.
- 17.6. RM-6: When livestock management practices are determined to not be compatible with meeting or making progress towards achievable habitat objectives following consultation, cooperating and coordination with permittees and interested publics, implement changes in grazing management through grazing authorization modifications, or allotment management plan implementation. Potential modifications include, but are not limited to, changes in:
- 1) Season or timing of use;
  - 2) Numbers of livestock;
  - 3) Distribution of livestock use;
  - 4) Duration and/or level of use;
  - 5) Kind of livestock (e.g., cattle, sheep, horses, or goats) (Briske et al. 2011);
  - 6) Voluntary measures such as temporary non-use; and
  - 7) Grazing schedules (including rest or deferment).
- 17.7. RM-7: Where opportunities exist, establish forage reserves to facilitate restoration and rehabilitation efforts in sage-grouse habitat areas.
- 17.8. RM-8: CMZ & IMZ - When an allotment becomes vacant or grazing preference is relinquished, consider voluntary retirement of the allotment or grazing preference in whole or in part, or converting the area to a forage reserve/buffer when doing so would maintain or enhance sage-grouse habitat. GMZ - When an allotment

- becomes vacant or grazing preference is relinquished, consider converting it to a forage reserve/buffer to use during fire rehabilitation or restoration efforts elsewhere, when such actions would result in a net benefit to GRSG habitat and other priority resources.
- 17.9. RM-9: CMZ & IMZ - Where practical, design pasture rotations to utilize exotic perennial grass seedings and/or annual grasslands, during GRSG nesting season annually or periodically.
- 17.10. RM-10: Evaluate the locations where salt/supplements are placed. In coordination with the permittee, have salt/supplements placed in areas which would reduce impacts to GRSG habitat (e.g., existing disturbed areas).
- 17.11. RM-11: Incorporate RDFs into Terms and Conditions for crossing permits to limit disturbance of occupied leks when trailing livestock across BLM- and Forest Service-administered lands in the spring. Work with permittees in locating over-nighting, watering and bedding locations to minimize impacts to seasonal habitats.
- 17.12. RM-12: Design any new structural range improvements, following cooperation, consultation and coordination with permittees, to minimize and/or mitigate effects to GRSG habitat. Any new structural range improvements are subject to RDFs (Appendix A). Structural range improvement in this context, include, but are not limited to: fences, enclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments.
- 17.13. RM-13: During the land health assessment and grazing permit renewal process, evaluate existing livestock management range improvements with respect to their effect on GRSG habitat. Consider removal of projects that are not needed for effective livestock management, are no longer in working condition, and/or negatively affect GRSG habitat, with the exception of functional projects needed for management of habitat for other threatened, endangered or proposed species or other sensitive resources.
- 17.14. RM-14: Prioritize removal, modification or marking of fences or other structures in areas of high collision risk following cooperation, consultation and coordination with permittees to reduce the incidence of GRSG mortality due to fence strikes (Stevens et al. 2012).

**Comment [BER30]:** From Paul – See revised buffer table.

## **18. Wild Horses and Burros**

- 18.1. Wild Horse and Burro (WHB)-1: Develop or amend BLM Herd Management Area Plans and Forest Service Wild Horse Territory Plans to incorporate GRSG habitat objectives and management considerations for all BLM HMAs) and Forest Service Wild Horse Territories.
- 18.2. WHB-2: When evaluating AML on HMAs within CMZ, evaluate indicators that address structure/condition/composition of vegetation and measurements specific to achieving GRSG habitat objectives.
- 18.3. WHB-3: Utilize interdisciplinary land health assessments in HMAs containing GRSG habitat to determine whether vegetation characteristics are meeting appropriate seasonal habitat objectives.
- 18.4. WHB-4: CMZ: Do not expand HMAs. IMZ: Analysis of proposed additions to existing HMA boundaries should consider the direct, indirect and cumulative impacts on GRSG habitat, including the need for additional infrastructure such as boundary fencing, and consider alternative areas outside of CMZ and IMZ.

## 19. Travel Management

- 19.1. Travel Management (TM) -1: Limit motorized travel within Idaho BLM Field Offices to existing roads, primitive roads, and trails. This excludes areas previously designated as open through an affirmative land use plan decision or currently under review for designation as open, currently being analyzed in ongoing RMP revision efforts in the Four Rivers, Jarbidge and Upper Snake Field Offices. The initial designation would be “limited to existing roads, primitive roads and trails”; this designation would change to “limited to designated roads, primitive roads and trails”, in areas where travel management plans are completed.
- 19.2. TM-2: Temporary closures will be considered in accordance with 43 CFR subpart 8364 (Closures and Restrictions); 43 CFR subpart 8351 (Designated National Area); 43 CFR subpart 6302 (Use of Wilderness Areas, Prohibited Acts, and Penalties); 43 CFR subpart 8341 (Conditions of Use).

Temporary closure or restriction orders under these authorities are enacted at the discretion of the authorized officer to resolve management conflicts and protect persons, property, and public lands and resources. Where an authorized officer determines that off-highway vehicles are causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources, the affected areas shall be immediately closed to the type(s) of vehicle causing the adverse effect until the adverse effects are eliminated and measures implemented to prevent recurrence. (43 CFR 8341.2) A closure or restriction order should be considered only after other management strategies and alternatives have been explored. The duration of temporary closure or restriction orders should be limited to 24 months or less; however, certain situations may require longer closures and/or iterative temporary closures. This may include closure of routes or areas.

- 19.3. TM-3: Develop Travel Management Plans for each Field Office as described in the BLM Travel Management Handbook 8342.1 and according to the travel management planning guidelines (Appendix N).
- 19.4. TM-4: During subsequent travel management planning design and designate a travel system to minimize adverse effects on GRSG. Locate areas and trails to minimize harassment of wildlife or significant disruption of wildlife habitats. Give special attention to protect endangered or threatened species and their habitats. Allow for route upgrade, closure of existing routes, and creation of new routes to help protect habitat and meet user group needs, thereby reducing the potential for pioneering unauthorized routes. The emphasis of the comprehensive travel and transportation planning within Core Management Zones would be placed on having a neutral or positive effect on GRSG habitat.
- 19.5. TM-5: Conduct road maintenance activities to avoid disturbance during specific times at different seasons – see seasonal and timing restrictions section.

## **20. Recreation**

- 20.1.** REC-1: Manage existing recreation uses and sites to minimize adverse effects on GRSG or their habitat through incorporation of RDFs, BMPs, buffers and seasonal restrictions.
- 20.2.** REC-2: Do not construct new recreation facilities (e.g., campgrounds, trails, trailheads, staging areas) within CMZs and IMZs unless the development would have a neutral effect or be beneficial to GRSG habitat (such as concentrating recreation, diverting use away from critical areas, etc.); or the new construction replaces existing facilities and reduces impacts from the existing facilities as in TM-4, or unless the development is required for visitor safety or resource protection.

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## **21. Monitoring**

- 21.1. Monitoring (MON)-1: Annually complete a review of FIAT Assessment implementation efforts within GRSG habitat with appropriate USFWS and state agency personnel.
- 21.2. MON-2: Annually monitor the effectiveness of fuels treatment projects.
- 21.3. MON-3: Monitor invasive vegetation post vegetation management treatment
- 21.4. MON-4: Monitor project construction areas for noxious weed and invasive species for at least 3 years, unless control is achieved earlier.
- 21.5. MON-5: Use lek, nesting and winter habitat maps and key habitat map (updates) to annually assess GRSG population and habitat status in the context of the adaptive management triggers.
- 21.6. MON-6: Continue to support updates to the Key Habitat map to track vegetation changes in relation to GRSG habitat on a yearly basis, until such a time this process is replaced. The process used to update the Key Habitat Map is described in Appendix F.
- 21.7. MON-7: Monitor GRSG habitat as described in the monitoring framework plan (Appendix E) in coordination with IDFG and MT FWP.

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### General Greater Sage-grouse

**GRSG-Gen-DC-001-Desired Condition** – The landscape for greater sage-grouse encompasses large contiguous areas, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist, with variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.

**GRSG-Gen-DC-002-Desired Condition** – Anthropogenic development is focused in non-habitat areas outside of priority and general management areas. Disturbance in general management areas is limited, and there is little to no disturbance in priority management areas except for valid existing rights and where benefits to greater sage-grouse are greater compared to other available alternatives.

**GRSG-Gen-DC-003-Desired Condition** – In greater sage-grouse management areas, including all seasonal habitats, 70% of lands capable of producing sagebrush have 10 to 30% sagebrush canopy cover and less than 10% conifer canopy cover. In addition, within breeding and nesting habitat, sufficient herbaceous vegetation structure and height provides overhead and lateral concealment for nesting and early brood rearing life stages. Within brood rearing habitat, wet meadows and riparian areas sustain a component of perennial forbs with a rich diversity of forb species relative to site potential. Within winter habitat, sufficient sagebrush height and density provides food and cover for greater sage-grouse during this seasonal period. Greater sage-grouse generally use the following seasonal habitats during the following periods: breeding and nesting, March 1 – June 15<sup>4</sup>; brood rearing and summer, June 16 – October 31<sup>1</sup>; winter, November 1 – February 28<sup>1</sup>. Specific desired conditions for greater sage-grouse based on seasonal habitat requirements are in table 1.

<sup>4</sup> Seasonal dates can be adjusted; that is, start and end dates may be shifted either earlier or later, but the amount of days cannot be shortened or lengthened by the local unit.

## Appendix H – Anthropogenic Disturbance

### Disturbance Density Calculation

#### GRSG Local/Site Disturbance Calculation

- **All sub-regions:** Agreed to use the same types of disturbances for fine/site scale monitoring as were used for broad and mid-scale analysis. Would use local data and/or more current satellite imagery if available. Recognize that site specific data, where available, provide a more accurate measure of land cover, disturbance and conifer encroachment than Landfire. In the long-term, ensure fine/site scale monitoring provides results that can be used across the GRSG range and “rolled up” for reporting purposes. In the short term (<5 years), locally derived vegetation data may not be available or easily rolled up, so use of seamless land cover data such as Sagestitch is recommended.

Great Basin sub-regions agreed to use the same type of data sets as used for broad and mid-scale to monitor local/site level conditions. Supplement with local data where available and/or more accurate. The following data layers or local surrogate would be used.

1. Energy (oil and gas wells and development facilities) Based on local info, actual footprint; see NOC language for certain exceptions.
2. Energy (coal mines) Actual footprint
3. Energy (wind towers) Based on local info, actual footprint
4. Energy (solar fields) Based on local info, actual footprint
5. Energy (geothermal) Based on local info, actual footprint
6. Mining (active developments; locatable, leasable, saleable) Based on local info, actual footprint
7. Infrastructure (roads) actual footprint; see road attachment for specific guidance
8. Infrastructure (railroads) abandoned railroads are NOT a disturbance
9. Infrastructure (power lines) Using NOC guidance, apply these widths:
  - <100 kV: use ROW width
  - 100-199kV: 100 ft
  - 200-399kV: 150 ft
  - 400-699kV: 200 ft
  - 700-799kV: 250 ft
10. Infrastructure (communication towers, fire lookouts, met towers) Based on local info, actual footprint
11. Other developed rights-of-ways

**Comment [GJS1]:** Do we need to provide a more specific reference?

**Comment [GJS2]:** Do we need to provide a more specific reference?



The National Monitoring Framework lists the data sets by threat. These are:

<b>FWS Listing Decision Threat</b>	<b>Sagebrush Habitat Availability</b>	<b>Habitat Degradation (Human Activities)</b>	<b>Density of Energy and Mining Facilities</b>
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X*		
Invasive Species	X*		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and salable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights of ways		X*	

The following data sets would *not* be used to calculate anthropogenic disturbance, but would be used in the habitat baseline to estimate habitat availability or the amount of sagebrush on the landscape within biologically significant units. Use best available data, where Landfire or Sagestitch could be used for biophysical setting (bps), compared to existing vegetation type.

1. Habitat treatments
2. Wildfire
3. Invasive plants
4. Conifer encroachment
5. Agriculture
6. Urbanization, Ex-urban and rural development

**Biologically Significant Unit:**

- Idaho proposes use of Priority (Core) and Important management areas that generally match PACs, but also anticipates assessing disturbance at other scales including nesting and winter habitat, 5 km lek neighborhood, Conservation Areas and/or at the project-scale, depending on need.
- For all subregions, data from these units would be rolled up to the PAC and WAFWA Management Zone, to meet FWS needs. In addition, units must be edge matched/aligned with neighboring states. All sub-regions acknowledge there may be locally important biologically significant units smaller than PACs which may or may not be rolled up to PAC level. The Subregions also acknowledge that assessing disturbance at larger scales such as certain PACs, or via rollup of data, provides a baseline metric for future comparison, but dilution may likely mask disturbance concerns occurring at more local scales.

**Comment [GJS3]:** Kelly Bocking had a paragraph highlighted in the literature that talks about disturbance which specifically warns against calculating disturbance over large areas, small/landscape scale.

***Travel and Transportation Disturbance in Sage-Grouse Habitat***

The following would count as disturbance:

- Linear transportation features identified as roads that have a maintenance intensity of 3 or 5
- Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a functional classification and a maintenance intensity of level 3 or 5

**Non-Disturbance**

The following items would not count as disturbance:

- Linear transportation features identified as trails.
- Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a maintenance intensity of either level 0 or 1.

Linear transportation features identified as primitive routes.  
Linear disturbances.

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*Travel and Transportation Management Definitions*

**Roads** are linear routes managed for use by low clearance vehicles having four or more wheels, and are maintained for regular and continuous use.

**Primitive Roads** are linear routes managed for use by four-wheel drive or high-clearance vehicles. They do not normally meet any design standards.

**Trails** are linear routes managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

**Linear Disturbances** are human-made linear features that are not part of the designated transportation network are identified as "Transportation Linear Disturbances." These may include engineered (planned) as well as unplanned single and two-track linear features that are not part of the BLM's transportation system.

**Primitive Routes** are any transportation linear feature located within a WSA or lands with wilderness characteristics designated for protection by a land use plan and not meeting the wilderness inventory road definition.

**Temporary routes** are short-term overland roads, primitive roads or trails which are authorized or acquired for the development, construction or staging of a project or event that has a finite lifespan. Temporary routes are not intended to be part of the permanent or designated transportation network and must be reclaimed when their intended purpose(s) has been fulfilled. Temporary routes should be constructed to minimum standards necessary to accommodate the intended use; the intent is that the project proponent (or their representative) will reclaim the route once the original project purpose or need has been completed. Temporary routes are considered emergency, single use or permitted activity access. Unless they are specifically intended to accommodate public use, they should not be made available for that use. A temporary route will be authorized or acquired for the specific time period and duration specified in the written authorization (permit, ROW, lease, contract etc.) and will be scheduled and budgeted for reclamation to prevent further vehicle use and soil erosion from occurring by providing adequate drainage and re-vegetation.

**Administrative routes** are those that are limited to authorized users (typically motorized access). These are existing routes that lead to developments that have an administrative purpose, where the agency or permitted user must have access for regular maintenance or operation. These authorized developments could include such items as power lines, cabins, weather stations, communication sites, spring

**Comment [GJS4]:** This could get confusing. Why have a new definition to confuse between Primitive Road and Primitive Route when we could simply qualify these Primitive Roads when appropriate as within WSA or Wilderness? Also not sure if we designate lands with wilderness characteristics in land use plans any more. We may manage for these characteristics through the use of VRM designations, NSO, etc. but does that then mean that all of the Primitive Roads within these various different surrogate designated areas now need to be reclassified as Primitive Routes?

**Comment [GJS5]:** Same argument. These are still Primitive Roads that may only exist temporarily. I think it is hard enough to get people used to Road and Primitive Road and do not feel that adding new terms for these rare and unique circumstances will help them or us.

**Comment [GJS6]:** Same argument as GJS57 (comment above). Administrative use is a restriction on Roads or Primitive Roads and is again, rare and unique enough that it should be dealt with as a use restriction rather than justification for a new term that will confuse the public.

*Maintenance Intensities*

**Level 0**

Maintenance Description:

Existing routes that will no longer be maintained and no longer be declared a route. Routes identified as Level 0 are identified for removal from the Transportation System entirely.

Maintenance Objectives:

- No planned annual maintenance.
- Meet identified environmental needs.
- No preventative maintenance or planned annual maintenance activities.

### **Level 1**

#### Maintenance Description:

Routes where minimum (low intensity) maintenance is required to protect adjacent lands and resource values. These roads may be impassable for extended periods of time.

#### Maintenance Objectives:

- Low (Minimal) maintenance intensity.
- Emphasis is given to maintaining drainage and runoff patterns as needed to protect adjacent lands. Grading, brushing, or slide removal is not performed unless route bed drainage is being adversely affected, causing erosion.
- Meet identified resource management objectives.
- Perform maintenance as necessary to protect adjacent lands and resource values.
- No preventative maintenance.
- Planned maintenance activities limited to environmental and resource protection.
- Route surface and other physical features are not maintained for regular traffic.

### **Level 3**

#### Maintenance Description:

Routes requiring moderate maintenance due to low volume use (for example, seasonally or year-round for commercial, recreational, or administrative access). Maintenance Intensities may not provide year-round access but are intended to generally provide resources appropriate to keep the route in use for the majority of the year.

#### Maintenance Objectives:

- Medium (Moderate) maintenance intensity.
- Drainage structures will be maintained as needed. Surface maintenance will be conducted to provide a reasonable level of riding comfort at prudent speeds for the route conditions and intended use. Brushing is conducted as needed to improve sight distance when appropriate for management uses. Landslides adversely affecting drainage receive high priority for removal; otherwise, they will be removed on a scheduled basis.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

### **Level 5**

#### Maintenance Description:

Route for high (maximum) maintenance due to year-round needs, high volume of traffic, or significant use. Also may include route identified through management objectives as requiring high intensities of maintenance or to be maintained open on a year-round basis.

Maintenance Objectives:

- High (Maximum) maintenance intensity.
- The entire route will be maintained at least annually. Problems will be repaired as discovered. These routes may be closed or have limited access due to weather conditions but are generally intended for year-round use.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Monday, July 28, 2014 9:26 AM  
**To:** 'rmickelsen@fs.fed.us'  
**Subject:** FW: Map requested  
**Attachments:** MapForScottHoefer\_07072014.pdf

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Brent Ralston [<mailto:bralston@blm.gov>]  
**Sent:** Monday, July 28, 2014 9:24 AM  
**To:** Travis Cooper; Rod Collins ([rcollins@blm.gov](mailto:rcollins@blm.gov)); 'Meredith Zaccherio ([meredith.zaccherio@empfi.com](mailto:meredith.zaccherio@empfi.com))'  
**Subject:** FW: Map requested

I like this map and think we should find a place for it in the EIS.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

**From:** Hoefer, Scott [<mailto:shoefer@blm.gov>]  
**Sent:** Monday, July 28, 2014 7:45 AM  
**To:** [bldavidson@fs.fed.us](mailto:bldavidson@fs.fed.us); [dmiddlebrook@fs.fed.us](mailto:dmiddlebrook@fs.fed.us); Colt, Chris J -FS; Malengo, Katherine -FS  
**Cc:** Travis Cooper; Brent Ralston  
**Subject:** Fwd: Map requested

Please see pdf map Travis created showing field office boundaries relative to Sage-grouse habitat. If you have suggested changes, please let Travis know. Thanks, Scott

----- Forwarded message -----  
**From:** **Cooper, Travis** <[tcooper@blm.gov](mailto:tcooper@blm.gov)>  
**Date:** Tue, Jul 8, 2014 at 8:13 AM  
**Subject:** Map requested  
**To:** Scott Hoefer <[shoefer@blm.gov](mailto:shoefer@blm.gov)>

Take a look, let me know if you need some changes

--  
**Travis Cooper**  
GIS Specialist

BLM Idaho State Office  
1387 Vinnell Way, Boise ID 83709  
(208) 373-3973  
[tcooper@blm.gov](mailto:tcooper@blm.gov)

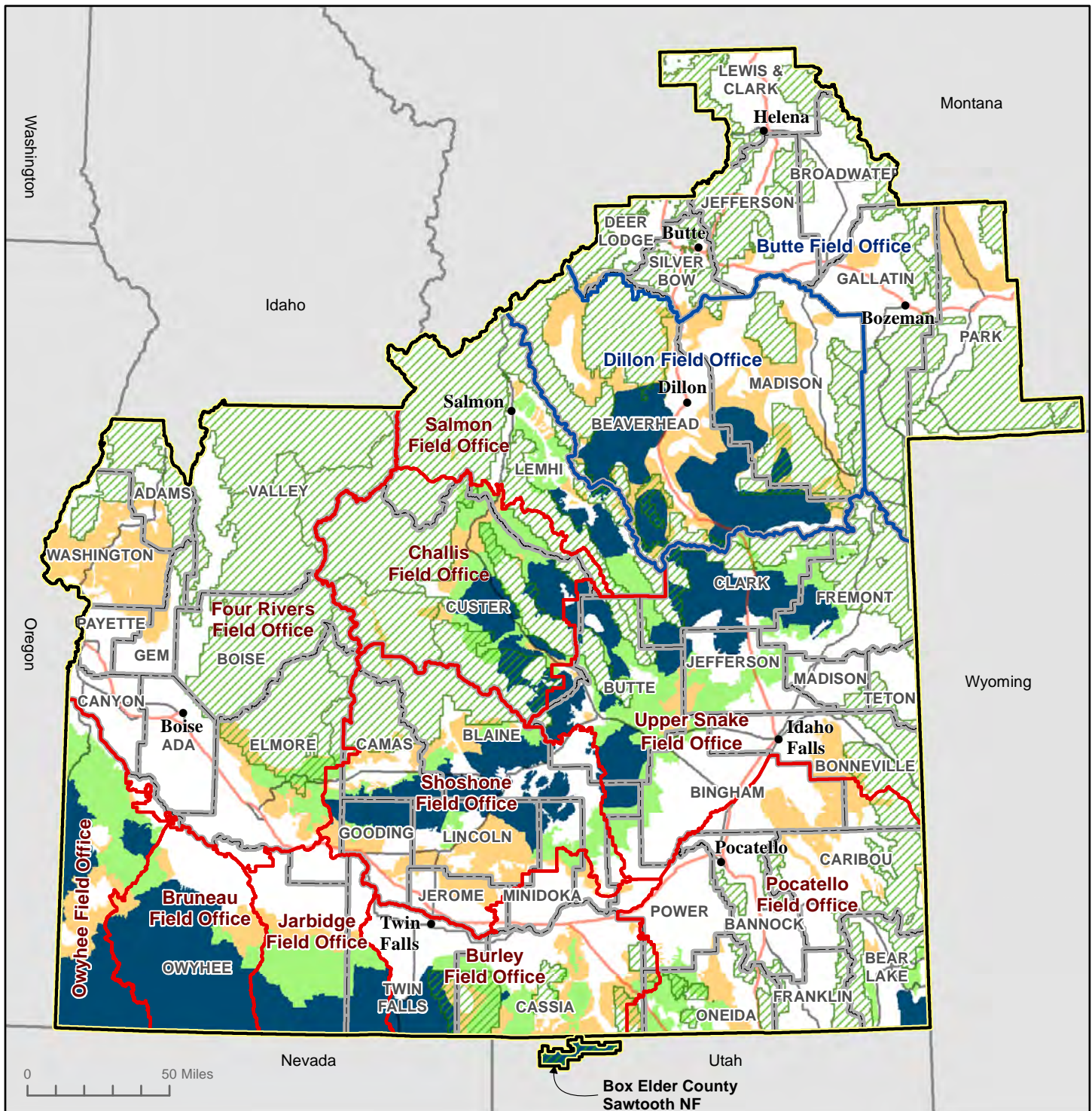
--

Scott Hoefler  
Fisheries Biologist/T&E Program Lead  
Idaho BLM State Office  
1387 S Vinnell Way  
Boise, ID 83709  
208-373-3819





# Idaho / Montana / Utah BLM Field Offices National Forests



- |                         |                         |
|-------------------------|-------------------------|
| EIS Planning Area       | <b>Management Zones</b> |
| BLM Idaho Field Offices | Core                    |
| BLM MT Field Offices    | Important               |
| Counties                | General                 |
| USFS Forest Boundaries  |                         |



No warranty is made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS). The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed. National Greater Sage-Grouse Planning Strategy BLM-USFS Sub-Regional EIS

Prepared by: TCooper  
Date: 07/07/2014



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

---

**Fwd: FW: SHPO correspondence for GRSG plans**

1 message

---

Beck, Jonathan <jmbeck@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Tue, Feb 24, 2015 at 8:42 AM

----- Forwarded message -----

From: Beck, Jonathan <jmbeck@blm.gov>  
Date: Tue, Feb 24, 2015 at 8:42 AM  
Subject: Re: FW: SHPO correspondence for GRSG plans  
To: Lauren Mermejo <lmermejo@blm.gov>  
Cc: Meredith Zaccherio <meredith.zaccherio@emp.si.com>

Lauren, we did not send the draft to SHPO seeking comment. Therefore, we did not receive any comments. We only send the 106 documents for their review and concurrence. Idaho SHPO does not care to see nepa docs. Jon

On Mon, Feb 23, 2015 at 10:39 AM, Lauren Mermejo <lmermejo@blm.gov> wrote:

Hi Folks –

Sarah Shattuck is looking for copies of the following from each of you:

- 1) BLM's letter/request to the SHPOs seeking input on the DEISs; and
- 2) Comments/response letters from the SHPOs on the DEISs.

Please send the letter and any comments that you received to me by the end of the week. I will follow-up with Sarah.

Thank-you!

Lauren

---

–  
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

8/18/2015

DEPARTMENT OF THE INTERIOR Mail - Fwd: FW: SHPO correspondence for GRSG plans

—

Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

---

**Re: SFA maps**

1 message

Beck, Jonathan &lt;jmbeck@blm.gov&gt;

Tue, Apr 28, 2015 at 8:13 AM

To: Jeffery Foss &lt;jfoss@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;

Cc: Kurt R Wiedenmann &lt;kwiedenmann@blm.gov&gt;, Brent Ralston &lt;bralston@blm.gov&gt;

Jeff, attached is the SFA as depicted in our PP/FEIS. It only shows SFA on BLM and FS land that contains PHMA. For example, please see that Craters of the Moon, and many other slivers are no longer considered SFA. Jon

On Mon, Apr 27, 2015 at 7:13 PM, Jeffery Foss <jfoss@blm.gov> wrote:

Please check our ability to produce a quick map for Virgil. Let's talk Tues AM

Thx

Sent from my iPhone

Begin forwarded message:

From: "Moore, Virgil" <virgil.moore@idfg.idaho.gov>

Date: April 27, 2015 at 5:45:35 PM MDT

To: "Foss, Jeffery L (jfoss@blm.gov)" <jfoss@blm.gov>

Cc: "Kemner, Don" <don.kemner@idfg.idaho.gov>, "Cally Younger (Cally.Younger@gov.idaho.gov)" <Cally.Younger@gov.idaho.gov>, "Dustin T. Miller (Dustin.Miller@osc.idaho.gov)" <Dustin.Miller@osc.idaho.gov>

Subject: SFA maps

Jeff,

We discussed Tuesday getting maps (electronic ) of the SFA smaller isolated areas for consideration of removal from the maps. Jim Lyons is asking me about that, as is FWS in Denver. Let us know if you need assistance.

I have not been all the way through e-mails form last week so if you already responded.

Thanks

Virgil

8/18/2015

DEPARTMENT OF THE INTERIOR Mail - Re: SFA maps

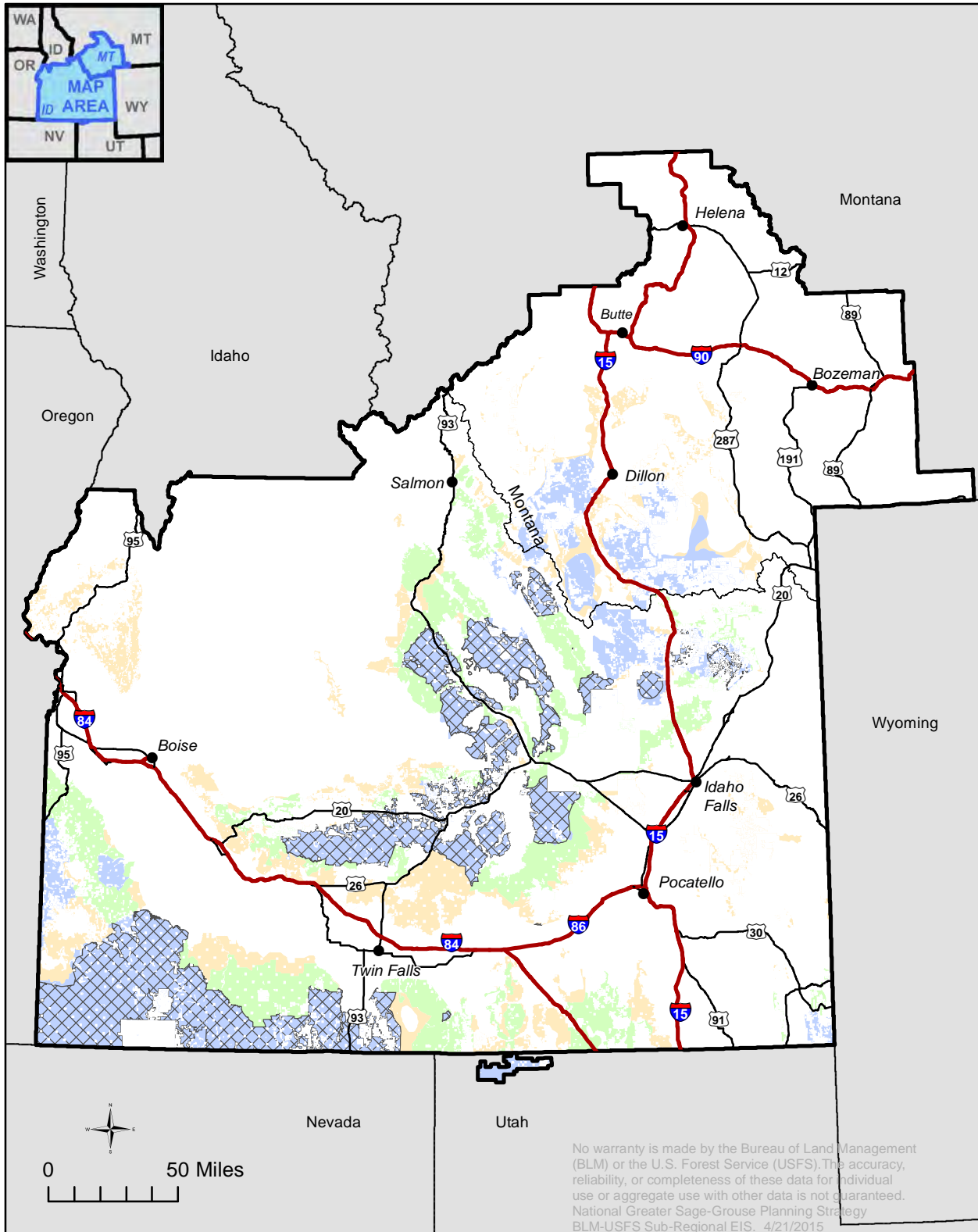
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

---

 SFA in PP.pdf  
2338K



**Figure 2-3**  
**Idaho-SW Montana Proposed Plan/Final EIS**  
**Sagebrush Focal Areas, BLM and USFS Managed Lands**



Sagebrush Focal Area

Idaho and SW Montana Sub-regional boundary

**Habitat Management Area**

PHMA

IHMA

GHMA



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

---

## ADPP

1 message

---

Bockting, Kelly <kbocktin@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Thu, Feb 19, 2015 at 8:14 AM

Jon,

In the ADPP there was a question on pg.45 about Appendix L. Functioning of boards.

I have discussed this with Pat Fosse and we have decided that it might be best to just remove this.

Originally I think it was a place holder to describe how the BLM would coordinate mitigation measures with other agencies and the "MT sage grouse oversight committee" however, since that has not been defined as of yet, we should just remove it. We feel there is enough already in the document explaining that we will coordinate with other agencies.

kb

Kelly Bockting  
Wildlife Biologist  
Bureau of Land Management  
Dillon Field Office  
1005 Selway Drive  
Dillon, MT 59725  
ph: 406-683-8000  
fax: 406-683-8066



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

---

**Fwd: grass height paper response from authors**

1 message

---

Bockting, Kelly <kbocktin@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Tue, Jan 6, 2015 at 4:01 PM

*FYI, you have probably seen the attached research, and I have reservations about how this is already being reported in the media, there is also a response from the authors in the attached link, but I doubt it will get much press.*

*kb*

<http://thesherdanpress.com/?p=29259>

*Kelly Bockting  
Wildlife Biologist  
Bureau of Land Management  
Dillon Field Office  
1005 Selway Drive  
Dillon, MT 59725  
ph: 406-683-8000  
fax: 406-683-8066*

---

doherly-et-al-2014-wildlife-biology.pdf  
122K



## **Linking conservation actions to demography: grass height explains variation in greater sage-grouse nest survival**

Author(s): Kevin E. Doherty, David E. Naugle, Jason D. Tack, Brett L. Walker, Jon M. Graham and Jeffrey L. Beck

Source: Wildlife Biology, 20(6):320-325. 2014.

Published By: Nordic Board for Wildlife Research

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## Linking conservation actions to demography: grass height explains variation in greater sage-grouse nest survival

Kevin E. Doherty, David E. Naugle, Jason D. Tack, Brett L. Walker, Jon M. Graham and Jeffrey L. Beck

K. E. Doherty ([kevin\\_doherty@fws.gov](mailto:kevin_doherty@fws.gov)), US Fish and Wildlife Service, Lakewood, CO 80228, USA. – D. E. Naugle and B. L. Walker, Wildlife Biology Program, Univ. of Montana, Missoula, MT 59812, USA. DEN also at: USDA Sage Grouse Initiative, Missoula, MT 59812, USA. – J. D. Tack, Fish, Wildlife and Conservation Biology, Colorado State Univ., Fort Collins, CO 80523, USA. – J. M. Graham, Mathematical Sciences, Univ. of Montana, Missoula, MT 59812, USA. – J. L. Beck, Dept of Ecosystem Science and Management, Univ. of Wyoming, Laramie, WY 82071, USA

Conservation success often hinges on our ability to link demography with implementable management actions to influence population growth ( $\lambda$ ). Nest success is demonstrated to be important to  $\lambda$  in greater sage-grouse *Centrocercus urophasianus*, an imperiled species in the North American sagebrush-steppe. Enhancing this vital rate through management represents an opportunity to increase bird numbers inside population strongholds. We identified management for grass height as an action that can improve nest success in an analysis of sage-grouse nests ( $n = 529$ ) from a long-term study (2003–2007) in the Powder River Basin, southeast Montana and northeast Wyoming, USA. Average grass height by study area and year varied (11.4–29.2 cm) but its positive effects on nest survival were consistent among study years and study areas that differed in absolute rates of nest success. We tested the predictive ability of models by grouping output from log-link analyses (2004–2006) into two bins with nest success probabilities  $< 0.45$  and  $> 0.55$ , and validated the relationship with additional data from 2003 and 2007. Nests with probabilities  $> 0.55$  were 1.64 (2004–2006) to 3.11 (2007) times more likely to hatch than those  $< 0.45$ , except in 2003 when an early wet spring resulted in universally high grass height at nest sites (29.2 cm) and high predicted nest success (64%). The high predictive power of grass height illustrates its utility as a management tool to increase nest success within priority landscapes. Relationships suggest that managing grass height during drought may benefit sage-grouse populations.

Achieving desired conservation outcomes requires planning at scales that match the biological needs of wide-ranging focal species (Nicholson et al. 2013). Inherent in conservation success is our ability to link demography to implementable management actions that influence population growth ( $\lambda$ ; Mills 2012). Implementing locally beneficial conservation practices inside intact ecosystems maximally benefits species for which landscape context matters (Wilson et al. 2007, Schultz 2010). Advances in spatial ecology make landscape prioritization more feasible (Millsbaugh and Thompson 2009), but identifying intact targets is only a first step (Knight et al. 2008). Still missing in most plans is a demographic link between a conservation action and its ability to influence demographic traits influencing  $\lambda$  (Wisdom et al. 2000, Caswell 2001).

Greater sage-grouse *Centrocercus urophasianus* (hereafter sage-grouse) are native only to western arid and semiarid sagebrush *Artemisia* spp. landscapes (Schroeder et al. 1999), and extirpated from half their range (Schroeder et al. 2004), the species is a candidate for listing under the federal Endangered Species Act (US Fish and Wildlife Service 2010). Major fragmenting threats include energy development (Naugle 2012), wildfire (Bukowski and Baker 2013, Murphy et al.

2013), cultivation for row crop production (Foley et al. 2011) and others (Knick et al. 2013). The current sage-grouse distribution encompasses 76 million hectares, yet population densities are highly clumped across their range (Doherty et al. 2010a). In efforts to focus conservation actions, the US Fish and Wildlife Service identified “Priority Areas for Conservation” (PACs; US Fish and Wildlife Service 2013) by consulting US states to incorporate the best available population and habitat data into site delineation. Research has focused on reducing threats to populations within PACs (Baruch-Mordo et al. 2013, Copeland et al. 2013), yet management actions that aim to bolster populations within priority areas will be critical for a species with declining distribution.

The purpose of our paper is to increase conservation effectiveness by exploring linkages between demography and implementable actions to benefit populations. Nest success is demonstrably important to  $\lambda$ , and enhancing this vital rate through management may benefit populations (Taylor et al. 2012). Variation in nest survival may in part be explained by grass height (DeLong et al. 1995), a feature influenced by grazing (Rickard et al. 1975), and a preeminent landuse in sagebrush systems. We used generalized linear models to

estimate the influence of vegetation and nest characteristics on sage-grouse nest survival within a landscape context (Dinsmore et al. 2002, Rotella et al. 2004). Findings will help guide the US Dept of Agriculture's Sage Grouse Initiative (SGI) in implementing rotational grazing systems designed to increase hiding cover for nesting grouse inside PACs on 847 000 ha of privately-owned rangelands (<www.sagegrouseinitiative.com/our-work/proactive-conservation/> under Grazing Systems).

## Material and methods

### Study area

We sampled sage-grouse in two distinct study areas in Johnson and Sheridan Counties in northeast Wyoming (southern region), and Bighorn, Rosebud, and Powder River Counties in southeast Montana (northern region), USA. Northern study areas were dominated by sagebrush, with conifer encroachment in more rugged landscapes and overall larger grassland areas. Southern study areas were also dominated by sagebrush, but had no conifers and exhibited smaller grassland areas. Shrub-steppe habitats were dominated by Wyoming big sagebrush *A. tridentata wyomingensis* with an understory of native and non-native grasses. Land use in both study areas was dominated by cattle ranching and land tenure was a mix of federal, state and private. Doherty et al. (2008) provides detailed descriptions of study areas. Because of the differences in landscape context, study area was included as a categorical blocking variable.

### Capture, radio-tracking and predictor variables

We captured sage-grouse in rocket-nets and walk-in traps (Giesen et al. 1982) and by spotlighting (Wakkinen et al. 1992) March–April and July–October in 2003–2007. We aged females, fitted them with necklace style VHF radio collars, and relocated sage-grouse to monitor nests by ground based radio-tracking throughout the breeding season. We used established protocols (Connelly et al. 2003) to quantify local vegetative features known to influence habitat selection within  $\leq 15$  m of nests (Connelly et al. 2000, Hagen et al. 2007; Table 1). Doherty et al. (2010b) provides a full description of nest monitoring.

### Statistical analyses and model selection

We used generalized linear models with a binomial likelihood and a log-link to estimate the influence nest age, study area and grass height on the daily survival rates (DSR) of nests (Dinsmore et al. 2002, Rotella et al. 2004). We derived nest survival rates by multiplying DSR together over the 28 day predicted incubation time for sage-grouse. We divided samples into nests used to build the model ( $n = 383$  nests in 2004–2006) and those used to test model stability and predictive capability ( $n = 146$  in 2003 and 2007).

We followed an iterative system for model selection. We first included a variable that controlled for the known effect of a spring snow storm in 2005 on DSR in all variable screenings and final model selection (Walker 2008).

Table 1. List of variables used in model selection explaining sage-grouse nest survival, Powder River Basin, Montana and Wyoming, USA, 2004–2006.

Candidate variables	Description
Local scale habitat variables	
Shrub canopy cover	using the line-intercept method along two 30 m perpendicular transects centered at nest or random locations (Canfield 1941)
Shrub density	all shrubs > 15 cm within 1 m of transect line were counted, total /120 m <sup>2</sup>
Quadratic shrub canopy cover	shrub canopy cover + (shrub canopy cover × shrub canopy cover)
Nearest shrub height	height of nearest shrub to Daubenmire quadrant location. There were 10 Daubenmire quads on each of the two 30 m transects for a total of 20 Daubenmire quads. They were spaced 3 m apart and started at 0 m
Visual obstruction at nest	height density readings at 0, 1, 3 and 5 m from nest or available shrub in each cardinal direction (Robel et al. 1970)
Nearest grass height	average of the vegetative droop height for the nearest grass from the 20 Daubenmire quadrants
Tallest grass height	average of the vegetative droop height for the tallest grass from the 20 Daubenmire quadrants
Average grass height	(nearest grass height + tallest grass height)/2
Nest characteristic variables	
Hen age	yearling or adult (Walker 2008)
Nest age	(nest age in days + nest age in days <sup>2</sup> ) (Walker 2008)
Snowstormmarker	grouped 7 nests that were abandoned following major snow event in May 2005
Abiotic site variables	
Study area	north or south Powder River Basin
Year	year of observation

We assigned predictor variables into 1 of 3 model categories: 1) habitat, 2) nest characteristic, and 3) site variables (Table 1). We first examined univariate selection for study area and the 8 habitat variables, and removed variables if 95% confidence intervals overlapped zero. If predictor variables were highly correlated ( $r \geq |0.7|$ ), only the variable with the greatest biological merit was included in the model (Chatfield 1995). When variables were moderately correlated (i.e.  $|0.3| \leq r < |0.7|$ ), we checked for stability and consistency of parameter estimates as predictor variables were added.

We allowed each variable that made it past variable screening to compete with all other combinations of variables to identify the most parsimonious model for habitat and study area. If variables made it past screening we determined if their addition improved model fit via Akaike's information criterion with a small sample size correction factor ( $AIC_c$ ; Burnham and Anderson 2002). After obtaining the best habitat model using  $AIC_c$  values, we then tested if inclusion of nest characteristic variables (Table 1) and an additional abiotic site variable (year effect) documented in Walker (2008) were still important predictor variables when included with

habitat covariates. We followed the exact variable screening and AIC methods described above to test if these variables improved model fit.

We tested the predictive strength of the final habitat model by grouping predicted nest survival probability from log-link analyses (2004–2006) into two bins with probabilities of nest survival,  $< 0.45$  and  $> 0.55$ , generically representing low and high nest survival probabilities, respectively. We then compared observed nest success from independent data sets (2003 and 2007) between low and high validation bins, and calculated the ratio of observed nest success between the high and low bins. We reasoned that observed nest success should be higher in the top validation bin if the final model predicted nest success well across years, demonstrated by a ratio of observed nest success  $> 1$  between bins. We further evaluated the predictive model by comparing predicted nest success from our top model to observed nest success by year. Average grass height around nesting sage-grouse in a given year (Table 1) was the only continuous predictor variable included in our top model, thus we evaluated how well one variable served as an indicator of nest success. Statistical analyses were performed in program SAS ver. 8.0 (SAS Inst. <http://v8doc.sascom/sashtml/>).

We performed a bootstrap analysis to quantify precision and the effect size of grass height on nest survival, using beta coefficients from the best approximating model (Burnham and Anderson 2002). We used the logistic exposure equation (Rotella et al. 2004) to generate the predicted probability of successfully hatching a nest for each bootstrap dataset ( $n = 5000$ ) by systematically varying grass height within the observed range of variation. We computed at each percentage the probability of successfully hatching a nest for each of 5000 simulations. We ordered these probabilities and used a rankit adjustment (Chambers et al. 1983) to estimate upper and lower 95% confidence intervals.

## Results

Nearest, tallest and average grass height were the only variables with significant coefficients when tested univariately. Nearest, tallest and average grass height were all positively associated with nest success, but were highly correlated and could not be included in the same model. Average and nearest grass height had virtually identical univariate coefficient estimates, however average grass height showed less variation around the estimate (average grass height  $\beta = 0.034$ ,  $SE = 0.013$ ,  $95\% CI = 0.008–0.060$  vs nearest grass height  $\beta = 0.039$ ,  $SE = 0.019$ ,  $95\% CI = 0.001–0.076$ ). Further, average grass height outcompeted nearest and tallest grass measures based on  $AIC_c$  values, thus it was retained for additional modeling.

The addition of study area increased model fit, while hen age and year effects were removed from the model because they explained no additional variation in nest survival when included with habitat variables and confidence intervals around effect estimates overlapped zero. The inclusion of nest age increased model fit ( $w_i = 0.974$ ; Table 2). Our final model included average grass height, nest age, study area and the variable that controlled for the known effect of a spring snow storm in 2005 on DSR.

Table 2. Comparisons of grass height, study area and nest age variables to identify the  $AIC_c$  best model explaining sage-grouse nest survival, Powder River Basin, Montana and Wyoming, 2004–2006<sup>a</sup>.

Model	K	$AIC_c$	$\Delta AIC_c$	$w_i$
Average grass height + study area + nest age	6	834.418	0.000	0.974
Average grass height + study area	4	841.634	7.216	0.026
Average grass height	3	866.099	31.681	0.000
Study area	3	927.881	93.463	0.000

<sup>a</sup>all models included a categorical blocking variable which controlled for nests abandoned in a heavy spring storm in 2005 (Walker 2008).

Estimates of average grass height tracked annual trends in nest success (Fig. 1; northern region 2003–2007, beta estimate = 0.036,  $p = 0.023$ ; southern region 2004–2007, beta estimate = 0.079,  $p = 0.001$ ). Bootstrap analyses showed the positive relationship between average grass height and nest success (Fig. 2). Our final model including grass height and study area demonstrated large effect sizes (Fig. 2). Nests with probabilities  $> 0.55$  were 1.64 (2004–2006) to 3.11 (2007) times more likely to hatch than those  $< 0.45$  (Table 3), except in 2003 when average grass height (29.2 cm) and apparent nest success reached their highest recorded levels (68%, Fig. 1).

## Discussion

High predictive power of grass height illustrates its utility as a management tool to benefit sage-grouse populations. Findings show grass height is a strong predictor of nest survival inside intact landscapes, and increasing hiding cover can increase nest success, a demographic rate that explains a

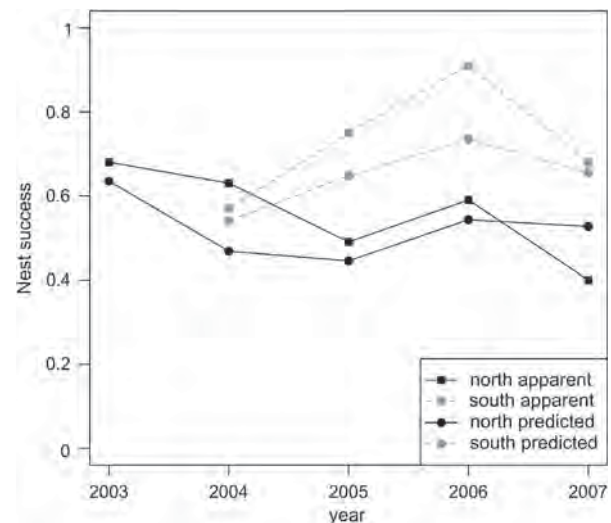


Figure 1. Apparent and predicted annual nest survival by year for sage-grouse in the Powder River Basin, Montana and Wyoming, US, 2003–2007. The final model included the effects of grass height, nest age, study area, and 2005 spring snow storm. Grass height measurements were averaged across nests within years to make annual predictions.

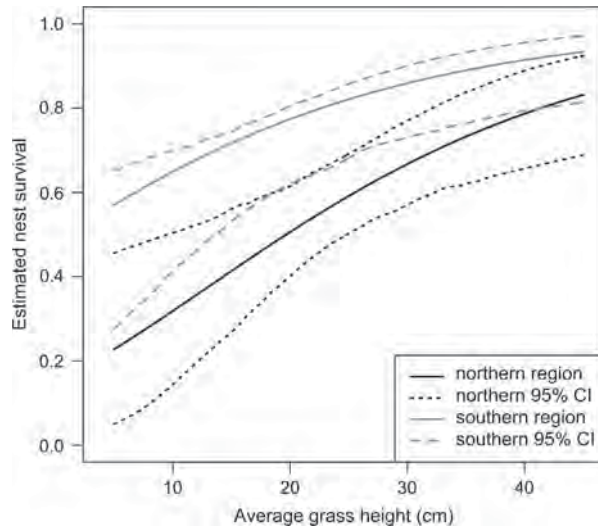


Figure 2. Relationship between average grass height and sage-grouse nest survival, Powder River Basin, Montana and Wyoming, USA, 2004–2006. Estimates of nest survival (95% confidence intervals [CIs]) in both study areas are based on 5000 bootstrap samples.

third of variation in  $\lambda$  (Taylor et al. 2012). Moreover, grass height is a reliable management tool because it explained variation (Fig. 2) despite variability in absolute rates of nest success between study areas. Positive effects of grass height should be evaluated on other important demographic rates including adult female and chick survival (Taylor et al. 2012) to see if benefits extend beyond what is now known.

Managing grass height in large and intact landscapes with grazing is a tool that may benefit populations in eastern Montana and northeast Wyoming. Positive effects of grass height in our study areas explained variation in nest success between years with large and precise effect sizes. Differing intercepts prohibit extrapolating of results to novel sagebrush systems because absolute effects likely depend upon regional conditions that influence grass and shrub composition. South and west of our study areas where sagebrush rather than grass provides most hiding cover, grass height had only a weak effect on nest success, and nest fates were dominated by year and site effects (Holloran et al. 2005). Grass height is positively related to nest success for other prairie grouse species

Table 3. Validation of grass height as a predictor for sage-grouse nest success, Powder River Basin, Montana and Wyoming, 2003–2007. We tested the AICc best model (Table 2) by calculating the predicted probability of hatching for each nest by applying grass height and region coefficients from log-link analysis (2004–2006) to observed grass heights at nests. We used the predicted probability ( $n$  is number of nests in each category) of hatching to group nests with probabilities of  $<0.45$  and  $>0.55$  and then compared apparent nest success ratios. We also validated the relationship with independent data sets (2003 and 2007). Nest age was excluded because we exponentiated daily survival rate for nests across the 28-day incubation period.

Predicted probability	Observed nest success		
	2003	2004–2006	2007
$p < 0.45$ (low)	0.714 ( $n = 7$ )	0.486 ( $n = 70$ )	0.200 ( $n = 5$ )
$p > 0.55$ (high)	0.667 ( $n = 30$ )	0.796 ( $n = 184$ )	0.623 ( $n = 52$ )
Ratio (high/low)	0.93	1.64	3.11

and subspecies (Attwater's prairie-chickens *Tympanuchus cupido attwateri*, Lehmann 1941; plains sharp-tailed grouse *T. phasianellus jamesi*, Hillman and Jackson 1973; greater prairie-chicken *T. cupido pinnatus*, McKee et al. 1998).

Findings suggest that maintaining grass height during drought may provide the greatest benefits to populations. Average grass height and predicted nest success in this study is within the range of published literature (Schroeder et al. 1999, Connelly et al. 2000). Benefits may be negligible in years resembling 2003 when spring rains provided abundant grass and the correspondingly highest predicted nest success for the northern study area. High variation in pooled grass height by study area and years (11.4–29.2 cm) also suggested that modifying grazing practices to maintain nesting cover could improve a habitat feature that otherwise limits  $\lambda$ . We have identified a strong corollary of nest success in the Powder River Basin (PRB). If this relationship is validated in new study areas across different parts of the sage-grouse range, and if the relationship between grass height and nest success can be calibrated within these new areas, grass height may be useful as a surrogate to monitor nest success.

Findings emphasize the importance of an indirect effect of grazing on sage-grouse nest success. Results have broad implications because livestock grazing is the most widespread land use in the world (Holechek et al. 2003), affecting 70% of land area in the western US (Fleischner 1994). Effects of grazing on sage-grouse habitat may be wide-ranging depending upon current and historic timing and intensity of grazing, soil conditions, precipitation, plant communities and habitat features under consideration (Beck and Mitchell 2000, Connelly et al. 2000, 2004, Crawford et al. 2004). However, adjustments to duration and timing of grazing also may increase residual cover with the added benefit of increasing long-term rangeland health on which birds depend. For example, reducing the short-term stocking rate of sheep increased black grouse *Tetrao tetrix* numbers by 6% annually in Europe by increasing residual cover (Calladine et al. 2002). Replicated experiments to document sage-grouse response to different grazing systems are needed to help guide land managers to practices that are beneficial to sage-grouse and economically viable to producers (Krausman et al. 2011).

Habitat management within a PAC-based conservation strategy may benefit populations, but sage-grouse are a wildland species, and grass height is of little consequence if sagebrush systems continue to be replaced by anthropogenic land uses (Knick et al. 2013). Viability of ranching as a predominant land use may in part determine the future of sage-grouse conservation in the West. The SGI has increased by four-fold their implementation of rotational grazing systems by resting for up to 17 months the pastures used by nesting sage-grouse within 488 000 ha inside Montana's PACs (J. Siddoway pers. comm.). Our findings suggest that these types of grazing systems that promote nest success may provide one mechanism to offset population losses by increasing bird numbers.

*Acknowledgements* – We thank landowners in the PRB that granted access to private lands. J. Hess, K. Keith, D. Nonne and F. Sutti provided outstanding leadership and assistance in the field. Major

funding for this work came from Bureau of Land Management (BLM) offices in Montana and Wyoming. Additional support came from the BLM (Washington DC), US Dept of Energy, Montana Dept of Fish, Wildlife and Parks, Wyoming Game and Fish Dept, National Fish and Wildlife Foundation, National Science Foundation (EPS-CORE program), Montana Cooperative Wildlife Research Unit, Petroleum Association of Wyoming, Western Gas Resources Inc., Wolf Creek Charitable Foundation, Bighorn Environmental Consulting, Anheuser-Busch Companies, Inc. and the Univ. of Montana. The views of the lead author are his own and do not necessarily represent the USFWS.

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Beck, Jonathan <jmbeck@blm.gov>

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## Fwd: MT disturbance cap language

1 message

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Carlson, John <jccarso@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Wed, Feb 18, 2015 at 11:06 AM

Hi Jon,  
Here is the additional language for the Dillon portion regarding disturbance caps. Ignore the highlighted portion.  
Let me know if you have any questions on this. J

John C. Carlson  
Conservation Biologist  
Bureau of Land Management  
Montana/Dakotas State Office  
5001 Southgate Drive  
Billings, MT 59101-4669  
(406) 896-5024

----- Forwarded message -----

From: Carlson, John <jccarso@blm.gov>  
Date: Wed, Feb 18, 2015 at 10:00 AM  
Subject: MT disturbance cap language  
To: Ruth Miller <ramiller@blm.gov>, Adam Carr <acarr@blm.gov>, Brian Hockett <blhockett@blm.gov>, Carolyn Sherve-Bybee <csherveb@blm.gov>, Mary Bloom <mbloom@blm.gov>, Sandra S Brooks <ssleach@blm.gov>, Craig Drake <cdrake@blm.gov>, Todd Yeager <tyeager@blm.gov>

Hello all,  
Attached is the disturbance cap language for all of you to use in your plans. J

John C. Carlson  
Conservation Biologist  
Bureau of Land Management  
Montana/Dakotas State Office  
5001 Southgate Drive  
Billings, MT 59101-4669  
(406) 896-5024



MT Disturbance Transition Language.docx  
14K



*If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a project analysis area, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.) will be permitted by BLM within a project analysis area until the disturbance has been reduced to less than the cap. If the BLM determines that the State of Montana has adopted a GRSG Habitat Conservation Program that contains comparable components to those found in the State of Wyoming's Core Area Strategy including an all lands approach for calculating anthropogenic disturbances, a clear methodology for measuring the density of operations, and a fully operational Density Disturbance Calculation Tool, the 3% disturbance cap will be converted to a 5% cap for all sources of habitat alteration within a project analysis area.*



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## More drop in language

1 message

**Carman, Stephanie** <scarman@blm.gov>

Thu, Apr 23, 2015 at 3:51 PM

To: Joan Suther <jsuther@blm.gov>, Lauren Mermejo <lmermejo@blm.gov>, Bridget Clayton <bclayton@blm.gov>, Erin Jones <erjones@blm.gov>, "Carlson, John C" <jccarlso@blm.gov>, Pamela Murdock <pmurdock@blm.gov>, Quincy Bahr <qfbahr@blm.gov>, Jonathan Beck <jmbeck@blm.gov>

Cc: David Batts <david.batts@empfi.com>, "Dillon, Madelyn -FS" <mdillon@fs.fed.us>, Glen Stein <gstein@fs.fed.us>, Matthew Magaletti <mmagalet@blm.gov>, Michael Hildner <mhildner@blm.gov>, Sarah Shattuck <sarah.shattuck@sol.doi.gov>, Aaron Moody <aaron.moody@sol.doi.gov>, Edwin Roberson <eroberso@blm.gov>, Amy Lueders <alueders@blm.gov>

I really hope these are the last updates (though i know there will be a grass bank definition to come next week). Please see these two attachments, one for grazing which includes changes for buffers and one for adaptive management. I have highlighted the changed language in the grazing document to make it easier to pick out. Please let me know if you have any questions.

And thank you all. Everyone involved in this planning effort got major props from the Department today, when I said we were on target to meet the May 29th publication date!

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Thu, Apr 23, 2015 at 12:12 PM, Carman, Stephanie <scarman@blm.gov> wrote:  
Attached is the template for cooperatior review, which is to begin April 29.

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Wed, Apr 22, 2015 at 4:20 PM, Carman, Stephanie <scarman@blm.gov> wrote:  
In follow up to our call today:

SFA drop in language for Chapter 1 and Chapter 2 - attached - including FWS memo webpage <http://www.fws.gov/greatersagegrouse/documents/ESA%20Process/GRSG%20Strongholds%20memo%20to%20BLM%20and%20USFS%20102714.pdf>

Map direction - In Chapter 1, please include a general map showing your planning area, habitat, and land management. SFA, PHMA, GHMA, etc. maps should be in Chapter 2.

Adaptive Management - to ensure that everyone has the comments on Adaptive Management regarding where/how the response was analyzed, I've attached the comment summary on the Adaptive Management strategy.

Communications - The BLM Communications Plan is attached.

Cooperator Review - The cooperatior review will be April 29 - May 13.

**Schedule - attached is the latest schedule, which has changes in red**

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scaman@blm.gov](mailto:scaman@blm.gov)

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**2 attachments**

**Grazing Drop In Language 4.23.14.docx**  
29K



**Adaptive Management.docx**  
14K

## Drop In Language For the Plans:

### **Vegetation Objectives**

The ADPPs will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be developed using current local and regional GRSG habitat research and data and used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP.

These habitat objectives in Table XX summarize the characteristics that research has found represent the seasonal habitat needs for Greater Sage-Grouse. The specific seasonal components identified in the Table were adjusted based on local science and monitoring data to define the range of characteristics used in this subregion. Thus, the habitat objectives provide the broad vegetative conditions we strive to obtain across the landscape that indicate the seasonal habitats used by sage-grouse. These habitat indicators are consistent with the rangeland health indicators used by the BLM.

The habitat objectives will be part of the sage-grouse habitat assessment to be used during land health evaluations (see Monitoring Framework, Appendix X). These habitat objectives are not obtainable on every acre within the designated GRSG habitat management areas. Therefore, the determination on whether the objectives have been met will be based on the specific site's ecological ability to meet the desired condition identified in the table.

All BLM use authorizations will contain terms and conditions regarding the actions needed to meet or progress toward meeting the habitat objectives. If monitoring data show the habitat objectives have not been met nor progress being made towards meeting them, there will be an evaluation and a determination made as to the cause. If it is determined that the authorized use is a cause, the use will be adjusted by the response specified in the instrument that authorized the use.

The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

- *In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with*

10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in *Interpreting Indicators of Rangeland Health* (BLM Tech Ref 1734-6).

### **Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of ADPPs.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*
- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds, based on **GRSG Habitat Objectives Table, Land Health Standards (43 CFR 4180.2) and ecological site potential, and one or more defined responses that will allow the authorizing officer to make adjustments to livestock grazing that have already been subjected to NEPA analysis.***
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives, **such as grass banks or fire breaks.***

### **Lek Buffers**

**Issue:**

**Application of Lek Buffers**

**Direction:**

The ADPPs will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment V) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review ([Open File Report 2014-1239](#)) in accordance with Appendix X.”*

### Attachment V

#### **Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*  
Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the

BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

- linear features (roads) within 3.1 miles of leks
- infrastructure related to energy development within 3.1 miles of leks.
- tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
- low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
- surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
- noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in GHMA that are within the applicable lek buffer distance identified above only if:

- Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater level of protection to GRS and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or
- The BLM determines that impacts to GRS and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and

- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).
- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- Range improvements which do not impact GRSG, or, range improvements which provide a conservation benefit to GRSG such as fences for protecting important seasonal habitats, meet the lek buffer requirement.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.

Add to all plans, in the adaptive management section:

*In making amendments to this plan, the BLM will coordinate with the FWS as BLM continues to meet its objective of conserving, enhancing and restoring GRS habitat by reducing, minimizing or eliminating threats to that habitat.*





Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## ID Preconsistency Review

1 message

Carman, Stephanie &lt;scarman@blm.gov&gt;

Fri, Mar 6, 2015 at 9:45 AM

To: Jonathan Beck &lt;jmbeck@blm.gov&gt;

Cc: Michael Hildner &lt;mhildner@blm.gov&gt;, Lauren Mermejo &lt;lmermejo@blm.gov&gt;

Jon -

Attached, please find the preconsistency review for the Idaho plan. The plan is well done. Please let us know if you have any concerns or questions.

Thanks,  
Stephanie

Stephanie Carman  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

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Idaho Preconsistency.docx  
16K

Comment	Response
Section 2.1—Please remove “substantial” from section title. This is a change to the template.	
p.2-40 to p.2-42: Somewhere in the fluid minerals section, please reiterate that SFAs are NSO without waiver, exception, or modification.	
AD-1: Make following edit to be internally consistent with applying disturbance cap in IHMA: “...will be permitted by BLM within GRSG PHMAs and IHMAs in any given Biologically Significant Unit until the disturbance...”	
HM-OBJ-2/Table 2-3: Please add reference column to Table 2-3, and shown in 1/30 guidance. Please add reference for each desired condition.	
p. 2-43: Mineral Materials drop in language needs to apply to Idaho also.	
<p>LR-13: Please make following change to drop in language. This was a mistake in the guidance. Apologies. Please replace last sentence of LR-13 with:</p> <p>“The BLM is analyzing GRSG mitigation measures through the projects’ NEPA review process.”</p>	
LR-1: Please add language stating that GHMA (Montana) is open to minor ROWs. I don’t think I saw this captured in LR-1 or LR-2.	
FM-15: Please replace with new prescribed fire drop in language sent on March 4 <sup>th</sup> . Sorry for the late change.	
Mitigation Appendix: Please revise Part III of the mitigation appendix to remove the concept of “no net unmitigated loss”. This concept/standard has been replaced with “net conservation gain”. Is it possible to rephrase this Part III as the “Idaho and Southwestern Montana Subregion Net Conservation Gain Process” while keeping the rest of the content the same?	
Please indicate where the hard trigger responses are in the document. Not readily apparent in Chap 2 or the Appendix.	



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Grass bank language

1 message

Carman, Stephanie &lt;scarman@blm.gov&gt;

Mon, May 4, 2015 at 8:30 AM

To: Joan Suther <jsuther@blm.gov>, Lauren Mermejo <lmermejo@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, Quincy Bahr <qfbahr@blm.gov>, Pamela Murdock <pmurdock@blm.gov>, "Carlson, John C" <jccarls@blm.gov>, Erin Jones <erjones@blm.gov>, Bridget Clayton <bclayton@blm.gov>

Cc: Michael Hildner <mhildner@blm.gov>, Matthew Magaletti <mmagalet@blm.gov>, Vicki Herren <vherren@blm.gov>, Kimberly Hackett <khackett@blm.gov>, David Batts <david.batts@empis.com>, Richard Mayberry <rmayberr@blm.gov>

As you may have heard, we are changing the drop in language referencing grass banks as an example. Please use the below language instead in the grazing section:

- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives, such as reserve common allotments or fire breaks.*

A reserve common allotment is an area which is designated in the land use plan as available for livestock grazing but reserved as an area available for use as an alternative to grazing in another allotment in order to facilitate rangeland restoration treatments and recovery from natural disturbances such as drought or wildfire. The reserve common allotment would provide needed flexibility that would help the agency apply temporary rest from grazing where vegetation treatments and/or management would be most effective.

Stephanie Carman  
Bureau of Land Management  
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office 202-208-3408  
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[scarman@blm.gov](mailto:scarman@blm.gov)



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Re: new paper on ineffectiveness of corvid control**

1 message

Wiedenmann, Kurt &lt;kwiedenmann@blm.gov&gt;

Fri, Dec 19, 2014 at 7:02 AM

To: Katie Fite &lt;katie@westernwatersheds.org&gt;

Cc: Brandon Knapton &lt;bknapton@blm.gov&gt;, Ethan Ellsworth &lt;eellsworth@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;, Johanna Munson &lt;jmunson@blm.gov&gt;

Katie - Jon Beck is now the project leader for the GRSG EIS process.

Kurt Wiedenmann

Acting BLM Analyst, Office of the Assistant Secretary Lands and Minerals Management  
Washington, DC  
202--208-4555 - Office  
208-270-9659 - Cell

On Thu, Dec 18, 2014 at 11:30 AM, Katie Fite <katie@westernwatersheds.org> wrote:

Dear BLM,

Please fully consider the paper at the link below in any efforts to lethally "control" ravens on public lands.

BLM must take a more active role analyzing the adverse environmental impacts of various predator killing schemes conducted on public lands.

They imbalance ecosystems, and serve to distract from greatly needed habitat changes.

Better habitat is key, not poisoning native corvids.

<http://onlinelibrary.wiley.com/doi/10.1111/ibi.12223/pdf>

Madden et al. 2014.

Please fully consider this in the sage-grouse EIS process, as well as the 2015 iteration of a Wildlife Services EA to impose poison across broad swaths of Idaho public lands. In that process, only non-lethal "control" and habitat improvement measures can be considered viable corvid "control" alternatives.

Who is now in charge of the EIS process in Idaho? I understand Brandon Knapton is now working on the appalling effort to impose livestock facilities and continued high levels of overstocking and harmful periods of livestock use on the Garat allotment sage-grouse habitats.

Who is now in charge of the ID-NW MT GRSG EIS process?

Thank you,

Katie Fite  
Western Watersheds Project



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## Fwd: Riddle allotment livestock projects

1 message

Beck, Jonathan <jmbeck@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Wed, Dec 10, 2014 at 3:30 PM

----- Forwarded message -----

From: Wiedenmann, Kurt <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>  
Date: Wed, Dec 10, 2014 at 1:47 PM  
Subject: Fwd: Riddle allotment livestock projects  
To: Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>

Jon - see Katie's request that this information be included in the SG EIS record.

Kurt Wiedenmann

Acting BLM Analyst, Office of the Assistant Secretary Lands and Minerals Management  
Washington, DC  
202-208-4555 - Office  
208-270-9659 - Cell

----- Forwarded message -----

From: Katie Fite <[katie@westernwatersheds.org](mailto:katie@westernwatersheds.org)>  
Date: Tue, Dec 9, 2014 at 10:56 AM  
Subject: Re: Riddle allotment livestock projects  
To: Katie Fite <[katie@westernwatersheds.org](mailto:katie@westernwatersheds.org)>  
Cc: Tanya Thrift <[tthrift@blm.gov](mailto:tthrift@blm.gov)>, Kurt Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, James Fincher <[jfincher@blm.gov](mailto:jfincher@blm.gov)>, Loretta Chandler <[lchandler@blm.gov](mailto:lchandler@blm.gov)>, Jacob Vialpando <[jvialpando@blm.gov](mailto:jvialpando@blm.gov)>, Michelle Ryerson <[mryerson@blm.gov](mailto:mryerson@blm.gov)>, Ethan Ellsworth <[eellsworth@blm.gov](mailto:eellsworth@blm.gov)>, John Sullivan <[jsullivan@blm.gov](mailto:jsullivan@blm.gov)>, Ken Cole <[ken@westernwatersheds.org](mailto:ken@westernwatersheds.org)>, Travis Bruner <[travis@westernwatersheds.org](mailto:travis@westernwatersheds.org)>, Paul Ruprecht <[paul@westernwatersheds.org](mailto:paul@westernwatersheds.org)>, Jon Marvel <[jhmarvel@westernwatersheds.org](mailto:jhmarvel@westernwatersheds.org)>

Dear BLM,

I now just noticed as one continues on down the BLM eplanning page that there are MORE very harmful reservoir and other water "maintenance" projects under mere CEs.

This is alarming - as these projects are the basis for severe depletion, degradation and weed invasions of GRSG habitats. These cesspools of cow waste promote diseases and toxic algae, disrupt watershed processes and drainage networks, and further reduce, alter and destroy sage-grouse spring and meadow/drainage bottom/brood rearing habitats. Many of these are dug into springs or meadow areas.

Further, increasing the capacity of these harmful livestock developments to hold water only results in even more severe impacts to the surrounding landscape - as cows remain grazing in large numbers exploiting the surrounding lands. This severely depletes a wider and wider area. Impacts may become even worse during drought.

See: RIDDLE Reservoir maintenance. Isn't this part of a series of segmented, piecemeal projects in the Riddle

allotment? Why is this under a separate CE from the EA (which needs to be an EIS)?

<https://www.blm.gov/epl-front-office/eplanning/projectSummary.do?methodName=renderDefaultProjectSummary&projectId=40153>

Then this for SIMPLOT in the Northwest allotment:

<https://www.blm.gov/epl-front-office/eplanning/projectSummary.do?methodName=renderDefaultProjectSummary&projectId=39893>

#### Project Description:

Maintenance would involve removing accumulated sediment from reservoir bottoms, particularly the deepest storage areas by use of heavy equipment such as a bulldozer. Maintenance of the water gap involves repair or extension of the side panels and associated cables and use of an excavator to reduce the grade down into the water from the west approach. Disposal of some removed material within the adjacent water gap may be necessary. Spoil material could be sediment collected behind the embankment or bottoms of the deepest storage areas. Reservoir pit floors could be lined with a layer of clay bentonite if necessary to reestablish the seal after work is completed; but the work would be conducted in a manner intended to avoid damage to the seal. All earthwork and material staging would occur in areas previously affected by impoundment construction or inundation. The following maintenance stipulations would be in effect, per the original Cooperative Agreements, CXs, and EAs: 1. Stay within original area of disturbance 2. Disposal of sediment may be added to embankment for dam or reservoir berm if that is the most feasible action 3. Disturbed areas will be dressed so as to improve visual appearance 4. Cross country travel will be restricted to periods when the soil is dry and firm enough to support vehicles without creating ruts 5. No new roads or blading will be allowed in moving equipment to the various reservoir sites

#### Project Location:

T11S, R02E, Sec 9, 20 and T11S R03E Sec 24, 30, 35

An EIS is required for all of these, too.

There is also a project in the Battle Creek allotment for Simplot at Hutch Springs:

We have seen NO Scoping info. Please immediately provide me with all information on all of these projects, as well.

We are increasingly dismayed at the current path of the Boise District BLM.

In the Owyhee FO, following ALJ Holt's rancher-biased decision (with ALJ Holt never even addressing WWP's Appeal and claims), BLM released a Jackson permittee Garat EA that essentially had TWO rancher alternatives. At the same time, BLM has never even responded to WWP's request to meet to discuss a viable conservation alternative. Owyhee BLM is going in the dead opposite direction that all sage-grouse conservation science shows is necessary.

Now in the Bruneau for a Jackson permittee and others, BLM is proposing a raft of exceedingly harmful piecemeal water development intensification/expansion projects - ignoring the need to conserve, enhance and restore sage-grouse habitats by removing and reducing livestock facilities like these livestock water developments, and undertaking large-scale cuts in livestock use and numbers.

There needs to be new management that cares about sage-grouse, and not placating ranchers by intensifying cattle grazing use and killing every juniper in the County based on false Ecosite models and general anti-tree hysteria that the agency has embraced since it serves to distract from taking better care of the sagebrush habitats..

Here is what is happening to what is the largest block of somewhat intact sage remaining in the northern Great Basin GRSG population:

It is being trampled and grazed to a weedland. For example, the cows grazing right now in the Owyhee Stateline allotment are causing - in real time - the expansion of medusa head in one of the best remaining sage pockets left in the nearly destroyed Owyhee ID-OR border habitats. Medusahead, cheat and bulbous bluegrass are

exploding and will soon dominate nearly all the grossly trampled grazed lands in the ID-OR border north of the North Fork Owyhee. To the west, cheatgrass is increasing in Garat and Riddle, and now medusahead invasion looms. Plus bulbous bluegrass and cheatgrass (soon to be followed by medusahead) are sweeping the cow-trashed uplands in the Big Springs allotment and similar areas.

A bleak, bleak picture. Yet the agency response is to double down and do MORE of what has caused the problem in the first place.

I have attached a recent Doherty et al. 2014 paper showing the need to maximize grass height.

Please review the Attached paper - ALL of these damaging projects in the Bruneau, plus the Garat PEA - that are so heavily weighted toward the rancher's desires, show that the Boise District is abjectly failing to properly regulate livestock grazing impacts in the heart of the most important remaining habitats for sage-grouse in the West.

Please also enter this e-mail, and the preceding one of concern about the several Riddle allotment reservoir projects into the Project Record for the ID-E MT GRSG EIS.

Thank you.

Katie Fite  
Western Watersheds Project  
PO Box 2863  
Boise, ID 83701

On Dec 8, 2014, at 2:24 PM, Katie Fite wrote:

Dear BLM,

I was dismayed to see the following projects in the Riddle allotment posted on the Bruneau BLM's Website (Hoof Butte, Little Shoofly, Yatahoney):

Hoof Butte Wetland Construction – Project would change one to two acres of mesic meadow and silver sagebrush habitat into ephemeral wetland. Construction would require heavy equipment (i.e., tracked bull dozer and excavator). The wetland would be constructed to dry out each year but would hold approximately 12 – 24 inches of water over an area of one to two acres for a period of at least 9 months (November– July) each year. Wetland construction would be accomplished by constructing a ground water dam and reshaping the land behind the dam. Expanded project description available.

Little Shoofly Reservoir Improvement - This reservoir improvement project repair the breached earthen dam by using fill material from the adjacent borrow area. The increased water holding capacity of the reservoir depends on the amount of material removed from the adjacent borrow area. Grading the borrow area from its current level to that of the existing reservoir pit floor, for example may increase capacity by anywhere from 50 to 100 percent, by estimation. Leaving the grade higher would dampen this effect. Vegetation taken from the borrow area would be scattered below the earthen dam along the existing channel. Expanded project description available.

Yatahoney #1 Reservoir Improvement – This reservoir improvement project would re-design the feature by constructing a new earthen dam, lengthening the reservoir's shape, and constructing a new inlet channel. The existing earthen dam would continue to function as the impoundment structure. A new point of diversion

would be created by constructing a new channel. Material from new feature construction would be used onsite to construct a new earthen dam placed to divert water from ephemeral drainages upslope into the new channel and reservoir. The existing short channel would become a spillway, allowing effluent to flow back into the natural drainage after the feature fills. Expanded project description available.

BLM has long delayed conducting the necessary integrated environmental analysis to control the destructive, cheatgrass-spreading hoofprint of permittee Jackson grazing across these crucial sage-grouse, pygmy rabbit, migratory songbird, raptor, and big game and wild lands habitats.

The public was promised an evaluation by Mgr. Signe Sather Blair in the 1990s. BLM wasted tens or maybe even hundreds - of thousands of dollars - in collecting FRH and baseline data in the late 1990s and early 2000s - and never followed through.

Please review and provide me with all FRH, assessment, riparian, upland, wildlife and other information collected for this allotment over the past 20 years.

Due to the political power of the rancher, the process was aborted, funds wasted, and the land and crucial sage-grouse habitats including drying meadows left to become degraded, desertified and sage-grouse habitats invaded by weeds like cheatgrass and white top.

Moreover, we are very concerned that this is linked to the large-scale effort by the Jackson permittee to impose a massive damaging livestock facility footprint in the adjacent Garat allotment.

An EIS must be prepared to assess all of the impacts of the huge burden of livestock facilities in these Jackson allotments on sage-grouse and other wildlife in the local area and the region.

BLM must fully assess a wide range of alternative actions, including determining the capability and suitability of these lands to suffer continued livestock grazing disturbance.

How does expanding stinking, manure-choked waters and West Nile mosquito habitats harm public land and water health and native biota?

We are also concerned that BLM may be trying to placate the permittee - as the agency seeks to acquire a small parcel of land in the Owyhee wilderness that is held in private ownership.

Further, BLM has never adequately addressed our concerns about the very damaging footprint of livestock facilities across this allotment already such as communicated to you following a spring 2014 site visit.

For example, we request that you fully consider REMOVAL of the very harmful spring depleting spring development and livestock water pipeline in the Riddle allotment reported to you in the Attached e-mail.

It is time for a full and integrated hard look at conditions in Riddle, and major reductions and changes in livestock grazing impacts.

What is the current status and trend in sage-grouse habitats and leks? Where is cheatgrass currently present? Where are lands vulnerable to flammable cheatgrass expansion with continued grazing disturbance?

What has the actual use been in all pastures/units and the allotment over the past 20 years?

We are very concerned that use may be shifted and intensified in these areas of the Riddle allotment in order to please the permittee, or minimize cuts that must be made in Garat.

Please enter these concerns into the Garat process, and the Owyhee land trade process as well.



Please be sure to send to me all information on this harmful project if you go forward with it.

We request a site visit.

Sincerely,

/kf  
Katie Fite  
Western Watersheds Project  
PO Box 2863  
Boise, ID 83701

<bruneau turner and other degraded springs riddle area.pdf>

—

Jonathan Beck  
Bureau of Land Management  
208-384-3305 Boise District  
208-373-4070 Idaho State Office



Doherty et al 2014.pdf  
111K

## Linking conservation actions to demography: grass height explains variation in greater sage-grouse nest survival

Kevin E. Doherty, David E. Naugle, Jason D. Tack, Brett L. Walker, Jon M. Graham and Jeffrey L. Beck

K. E. Doherty ([kevin\\_doherty@fws.gov](mailto:kevin_doherty@fws.gov)), US Fish and Wildlife Service, Lakewood, CO 80228, USA. – D. E. Naugle and B. L. Walker, Wildlife Biology Program, Univ. of Montana, Missoula, MT 59812, USA. DEN also at: USDA Sage Grouse Initiative, Missoula, MT 59812, USA. – J. D. Tack, Fish, Wildlife and Conservation Biology, Colorado State Univ., Fort Collins, CO 80523, USA. – J. M. Graham, Mathematical Sciences, Univ. of Montana, Missoula, MT 59812, USA. – J. L. Beck, Dept of Ecosystem Science and Management, Univ. of Wyoming, Laramie, WY 82071, USA

Conservation success often hinges on our ability to link demography with implementable management actions to influence population growth ( $\lambda$ ). Nest success is demonstrated to be important to  $\lambda$  in greater sage-grouse *Centrocercus urophasianus*, an imperiled species in the North American sagebrush-steppe. Enhancing this vital rate through management represents an opportunity to increase bird numbers inside population strongholds. We identified management for grass height as an action that can improve nest success in an analysis of sage-grouse nests ( $n = 529$ ) from a long-term study (2003–2007) in the Powder River Basin, southeast Montana and northeast Wyoming, USA. Average grass height by study area and year varied (11.4–29.2 cm) but its positive effects on nest survival were consistent among study years and study areas that differed in absolute rates of nest success. We tested the predictive ability of models by grouping output from log-link analyses (2004–2006) into two bins with nest success probabilities  $< 0.45$  and  $> 0.55$ , and validated the relationship with additional data from 2003 and 2007. Nests with probabilities  $> 0.55$  were 1.64 (2004–2006) to 3.11 (2007) times more likely to hatch than those  $< 0.45$ , except in 2003 when an early wet spring resulted in universally high grass height at nest sites (29.2 cm) and high predicted nest success (64%). The high predictive power of grass height illustrates its utility as a management tool to increase nest success within priority landscapes. Relationships suggest that managing grass height during drought may benefit sage-grouse populations.

Achieving desired conservation outcomes requires planning at scales that match the biological needs of wide-ranging focal species (Nicholson et al. 2013). Inherent in conservation success is our ability to link demography to implementable management actions that influence population growth ( $\lambda$ ; Mills 2012). Implementing locally beneficial conservation practices inside intact ecosystems maximally benefits species for which landscape context matters (Wilson et al. 2007, Schultz 2010). Advances in spatial ecology make landscape prioritization more feasible (Millsbaugh and Thompson 2009), but identifying intact targets is only a first step (Knight et al. 2008). Still missing in most plans is a demographic link between a conservation action and its ability to influence demographic traits influencing  $\lambda$  (Wisdom et al. 2000, Caswell 2001).

Greater sage-grouse *Centrocercus urophasianus* (hereafter sage-grouse) are native only to western arid and semiarid sagebrush *Artemisia* spp. landscapes (Schroeder et al. 1999), and extirpated from half their range (Schroeder et al. 2004), the species is a candidate for listing under the federal Endangered Species Act (US Fish and Wildlife Service 2010). Major fragmenting threats include energy development (Naugle 2012), wildfire (Bukowski and Baker 2013, Murphy et al.

2013), cultivation for row crop production (Foley et al. 2011) and others (Knick et al. 2013). The current sage-grouse distribution encompasses 76 million hectares, yet population densities are highly clumped across their range (Doherty et al. 2010a). In efforts to focus conservation actions, the US Fish and Wildlife Service identified “Priority Areas for Conservation” (PACs; US Fish and Wildlife Service 2013) by consulting US states to incorporate the best available population and habitat data into site delineation. Research has focused on reducing threats to populations within PACs (Baruch-Mordo et al. 2013, Copeland et al. 2013), yet management actions that aim to bolster populations within priority areas will be critical for a species with declining distribution.

The purpose of our paper is to increase conservation effectiveness by exploring linkages between demography and implementable actions to benefit populations. Nest success is demonstrably important to  $\lambda$ , and enhancing this vital rate through management may benefit populations (Taylor et al. 2012). Variation in nest survival may in part be explained by grass height (DeLong et al. 1995), a feature influenced by grazing (Rickard et al. 1975), and a preeminent landuse in sagebrush systems. We used generalized linear models to

estimate the influence of vegetation and nest characteristics on sage-grouse nest survival within a landscape context (Dinsmore et al. 2002, Rotella et al. 2004). Findings will help guide the US Dept of Agriculture's Sage Grouse Initiative (SGI) in implementing rotational grazing systems designed to increase hiding cover for nesting grouse inside PACs on 847 000 ha of privately-owned rangelands (<www.sagegrouseinitiative.com/our-work/proactive-conservation/> under Grazing Systems).

## Material and methods

### Study area

We sampled sage-grouse in two distinct study areas in Johnson and Sheridan Counties in northeast Wyoming (southern region), and Bighorn, Rosebud, and Powder River Counties in southeast Montana (northern region), USA. Northern study areas were dominated by sagebrush, with conifer encroachment in more rugged landscapes and overall larger grassland areas. Southern study areas were also dominated by sagebrush, but had no conifers and exhibited smaller grassland areas. Shrub-steppe habitats were dominated by Wyoming big sagebrush *A. tridentata wyomingensis* with an understory of native and non-native grasses. Land use in both study areas was dominated by cattle ranching and land tenure was a mix of federal, state and private. Doherty et al. (2008) provides detailed descriptions of study areas. Because of the differences in landscape context, study area was included as a categorical blocking variable.

### Capture, radio-tracking and predictor variables

We captured sage-grouse in rocket-nets and walk-in traps (Giesen et al. 1982) and by spotlighting (Wakkinen et al. 1992) March–April and July–October in 2003–2007. We aged females, fitted them with necklace style VHF radio collars, and relocated sage-grouse to monitor nests by ground based radio-tracking throughout the breeding season. We used established protocols (Connelly et al. 2003) to quantify local vegetative features known to influence habitat selection within  $\leq 15$  m of nests (Connelly et al. 2000, Hagen et al. 2007; Table 1). Doherty et al. (2010b) provides a full description of nest monitoring.

### Statistical analyses and model selection

We used generalized linear models with a binomial likelihood and a log-link to estimate the influence nest age, study area and grass height on the daily survival rates (DSR) of nests (Dinsmore et al. 2002, Rotella et al. 2004). We derived nest survival rates by multiplying DSR together over the 28 day predicted incubation time for sage-grouse. We divided samples into nests used to build the model ( $n = 383$  nests in 2004–2006) and those used to test model stability and predictive capability ( $n = 146$  in 2003 and 2007).

We followed an iterative system for model selection. We first included a variable that controlled for the known effect of a spring snow storm in 2005 on DSR in all variable screenings and final model selection (Walker 2008).

Table 1. List of variables used in model selection explaining sage-grouse nest survival, Powder River Basin, Montana and Wyoming, USA, 2004–2006.

Candidate variables	Description
Local scale habitat variables	
Shrub canopy cover	using the line-intercept method along two 30 m perpendicular transects centered at nest or random locations (Canfield 1941)
Shrub density	all shrubs > 15 cm within 1 m of transect line were counted, total /120 m <sup>2</sup>
Quadratic shrub canopy cover	shrub canopy cover + (shrub canopy cover × shrub canopy cover)
Nearest shrub height	height of nearest shrub to Daubenmire quadrant location. There were 10 Daubenmire quads on each of the two 30 m transects for a total of 20 Daubenmire quads. They were spaced 3 m apart and started at 0 m
Visual obstruction at nest	height density readings at 0, 1, 3 and 5 m from nest or available shrub in each cardinal direction (Robel et al. 1970)
Nearest grass height	average of the vegetative droop height for the nearest grass from the 20 Daubenmire quadrants
Tallest grass height	average of the vegetative droop height for the tallest grass from the 20 Daubenmire quadrants
Average grass height	(nearest grass height + tallest grass height)/2
Nest characteristic variables	
Hen age	yearling or adult (Walker 2008)
Nest age	(nest age in days + nest age in days <sup>2</sup> ) (Walker 2008)
Snowstormmarker	grouped 7 nests that were abandoned following major snow event in May 2005
Abiotic site variables	
Study area	north or south Powder River Basin
Year	year of observation

We assigned predictor variables into 1 of 3 model categories: 1) habitat, 2) nest characteristic, and 3) site variables (Table 1). We first examined univariate selection for study area and the 8 habitat variables, and removed variables if 95% confidence intervals overlapped zero. If predictor variables were highly correlated ( $r \geq |0.7|$ ), only the variable with the greatest biological merit was included in the model (Chatfield 1995). When variables were moderately correlated (i.e.  $|0.3| \leq r < |0.7|$ ), we checked for stability and consistency of parameter estimates as predictor variables were added.

We allowed each variable that made it past variable screening to compete with all other combinations of variables to identify the most parsimonious model for habitat and study area. If variables made it past screening we determined if their addition improved model fit via Akaike's information criterion with a small sample size correction factor ( $AIC_c$ ; Burnham and Anderson 2002). After obtaining the best habitat model using  $AIC_c$  values, we then tested if inclusion of nest characteristic variables (Table 1) and an additional abiotic site variable (year effect) documented in Walker (2008) were still important predictor variables when included with

habitat covariates. We followed the exact variable screening and AIC methods described above to test if these variables improved model fit.

We tested the predictive strength of the final habitat model by grouping predicted nest survival probability from log-link analyses (2004–2006) into two bins with probabilities of nest survival,  $< 0.45$  and  $> 0.55$ , generically representing low and high nest survival probabilities, respectively. We then compared observed nest success from independent data sets (2003 and 2007) between low and high validation bins, and calculated the ratio of observed nest success between the high and low bins. We reasoned that observed nest success should be higher in the top validation bin if the final model predicted nest success well across years, demonstrated by a ratio of observed nest success  $> 1$  between bins. We further evaluated the predictive model by comparing predicted nest success from our top model to observed nest success by year. Average grass height around nesting sage-grouse in a given year (Table 1) was the only continuous predictor variable included in our top model, thus we evaluated how well one variable served as an indicator of nest success. Statistical analyses were performed in program SAS ver. 8.0 (SAS Inst. <http://v8doc.sascom/sashtml/>).

We performed a bootstrap analysis to quantify precision and the effect size of grass height on nest survival, using beta coefficients from the best approximating model (Burnham and Anderson 2002). We used the logistic exposure equation (Rotella et al. 2004) to generate the predicted probability of successfully hatching a nest for each bootstrap dataset ( $n = 5000$ ) by systematically varying grass height within the observed range of variation. We computed at each percentage the probability of successfully hatching a nest for each of 5000 simulations. We ordered these probabilities and used a rankit adjustment (Chambers et al. 1983) to estimate upper and lower 95% confidence intervals.

## Results

Nearest, tallest and average grass height were the only variables with significant coefficients when tested univariately. Nearest, tallest and average grass height were all positively associated with nest success, but were highly correlated and could not be included in the same model. Average and nearest grass height had virtually identical univariate coefficient estimates, however average grass height showed less variation around the estimate (average grass height  $\beta = 0.034$ ,  $SE = 0.013$ ,  $95\% CI = 0.008–0.060$  vs nearest grass height  $\beta = 0.039$ ,  $SE = 0.019$ ,  $95\% CI = 0.001–0.076$ ). Further, average grass height outcompeted nearest and tallest grass measures based on  $AIC_c$  values, thus it was retained for additional modeling.

The addition of study area increased model fit, while hen age and year effects were removed from the model because they explained no additional variation in nest survival when included with habitat variables and confidence intervals around effect estimates overlapped zero. The inclusion of nest age increased model fit ( $w_i = 0.974$ ; Table 2). Our final model included average grass height, nest age, study area and the variable that controlled for the known effect of a spring snow storm in 2005 on DSR.

Table 2. Comparisons of grass height, study area and nest age variables to identify the  $AIC_c$  best model explaining sage-grouse nest survival, Powder River Basin, Montana and Wyoming, 2004–2006<sup>a</sup>.

Model	K	$AIC_c$	$\Delta AIC_c$	$w_i$
Average grass height + study area + nest age	6	834.418	0.000	0.974
Average grass height + study area	4	841.634	7.216	0.026
Average grass height	3	866.099	31.681	0.000
Study area	3	927.881	93.463	0.000

<sup>a</sup>all models included a categorical blocking variable which controlled for nests abandoned in a heavy spring storm in 2005 (Walker 2008).

Estimates of average grass height tracked annual trends in nest success (Fig. 1; northern region 2003–2007, beta estimate = 0.036,  $p = 0.023$ ; southern region 2004–2007, beta estimate = 0.079,  $p = 0.001$ ). Bootstrap analyses showed the positive relationship between average grass height and nest success (Fig. 2). Our final model including grass height and study area demonstrated large effect sizes (Fig. 2). Nests with probabilities  $> 0.55$  were 1.64 (2004–2006) to 3.11 (2007) times more likely to hatch than those  $< 0.45$  (Table 3), except in 2003 when average grass height (29.2 cm) and apparent nest success reached their highest recorded levels (68%, Fig. 1).

## Discussion

High predictive power of grass height illustrates its utility as a management tool to benefit sage-grouse populations. Findings show grass height is a strong predictor of nest survival inside intact landscapes, and increasing hiding cover can increase nest success, a demographic rate that explains a

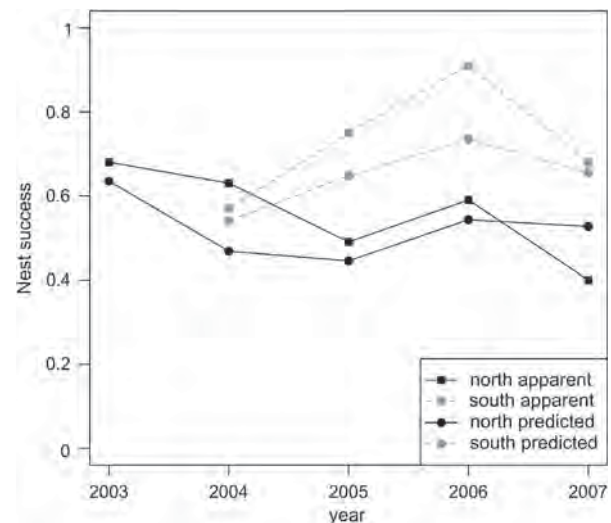


Figure 1. Apparent and predicted annual nest survival by year for sage-grouse in the Powder River Basin, Montana and Wyoming, US, 2003–2007. The final model included the effects of grass height, nest age, study area, and 2005 spring snow storm. Grass height measurements were averaged across nests within years to make annual predictions.

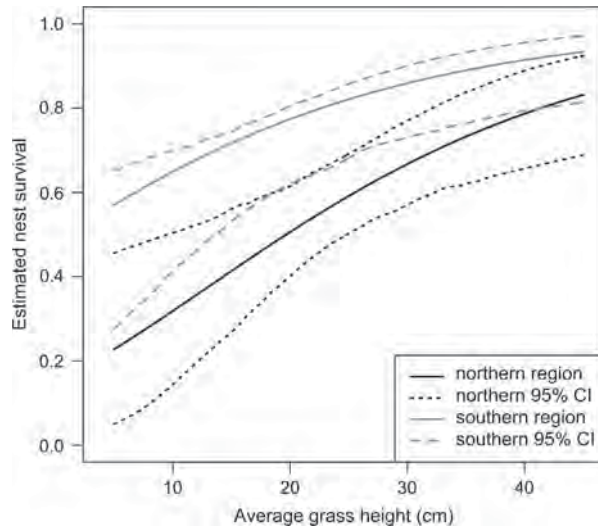


Figure 2. Relationship between average grass height and sage-grouse nest survival, Powder River Basin, Montana and Wyoming, USA, 2004–2006. Estimates of nest survival (95% confidence intervals [CIs]) in both study areas are based on 5000 bootstrap samples.

third of variation in  $\lambda$  (Taylor et al. 2012). Moreover, grass height is a reliable management tool because it explained variation (Fig. 2) despite variability in absolute rates of nest success between study areas. Positive effects of grass height should be evaluated on other important demographic rates including adult female and chick survival (Taylor et al. 2012) to see if benefits extend beyond what is now known.

Managing grass height in large and intact landscapes with grazing is a tool that may benefit populations in eastern Montana and northeast Wyoming. Positive effects of grass height in our study areas explained variation in nest success between years with large and precise effect sizes. Differing intercepts prohibit extrapolating of results to novel sagebrush systems because absolute effects likely depend upon regional conditions that influence grass and shrub composition. South and west of our study areas where sagebrush rather than grass provides most hiding cover, grass height had only a weak effect on nest success, and nest fates were dominated by year and site effects (Holloran et al. 2005). Grass height is positively related to nest success for other prairie grouse species

Table 3. Validation of grass height as a predictor for sage-grouse nest success, Powder River Basin, Montana and Wyoming, 2003–2007. We tested the AICc best model (Table 2) by calculating the predicted probability of hatching for each nest by applying grass height and region coefficients from log-link analysis (2004–2006) to observed grass heights at nests. We used the predicted probability ( $n$  is number of nests in each category) of hatching to group nests with probabilities of  $<0.45$  and  $>0.55$  and then compared apparent nest success ratios. We also validated the relationship with independent data sets (2003 and 2007). Nest age was excluded because we exponentiated daily survival rate for nests across the 28-day incubation period.

Predicted probability	Observed nest success		
	2003	2004–2006	2007
$p < 0.45$ (low)	0.714 ( $n = 7$ )	0.486 ( $n = 70$ )	0.200 ( $n = 5$ )
$p > 0.55$ (high)	0.667 ( $n = 30$ )	0.796 ( $n = 184$ )	0.623 ( $n = 52$ )
Ratio (high/low)	0.93	1.64	3.11

and subspecies (Attwater's prairie-chickens *Tympanuchus cupido attwateri*, Lehmann 1941; plains sharp-tailed grouse *T. phasianellus jamesi*, Hillman and Jackson 1973; greater prairie-chicken *T. cupido pinnatus*, McKee et al. 1998).

Findings suggest that maintaining grass height during drought may provide the greatest benefits to populations. Average grass height and predicted nest success in this study is within the range of published literature (Schroeder et al. 1999, Connelly et al. 2000). Benefits may be negligible in years resembling 2003 when spring rains provided abundant grass and the correspondingly highest predicted nest success for the northern study area. High variation in pooled grass height by study area and years (11.4–29.2 cm) also suggested that modifying grazing practices to maintain nesting cover could improve a habitat feature that otherwise limits  $\lambda$ . We have identified a strong corollary of nest success in the Powder River Basin (PRB). If this relationship is validated in new study areas across different parts of the sage-grouse range, and if the relationship between grass height and nest success can be calibrated within these new areas, grass height may be useful as a surrogate to monitor nest success.

Findings emphasize the importance of an indirect effect of grazing on sage-grouse nest success. Results have broad implications because livestock grazing is the most widespread land use in the world (Holechek et al. 2003), affecting 70% of land area in the western US (Fleischner 1994). Effects of grazing on sage-grouse habitat may be wide-ranging depending upon current and historic timing and intensity of grazing, soil conditions, precipitation, plant communities and habitat features under consideration (Beck and Mitchell 2000, Connelly et al. 2000, 2004, Crawford et al. 2004). However, adjustments to duration and timing of grazing also may increase residual cover with the added benefit of increasing long-term rangeland health on which birds depend. For example, reducing the short-term stocking rate of sheep increased black grouse *Tetrao tetrix* numbers by 6% annually in Europe by increasing residual cover (Calladine et al. 2002). Replicated experiments to document sage-grouse response to different grazing systems are needed to help guide land managers to practices that are beneficial to sage-grouse and economically viable to producers (Krausman et al. 2011).

Habitat management within a PAC-based conservation strategy may benefit populations, but sage-grouse are a wildland species, and grass height is of little consequence if sagebrush systems continue to be replaced by anthropogenic land uses (Knick et al. 2013). Viability of ranching as a predominant land use may in part determine the future of sage-grouse conservation in the West. The SGI has increased by four-fold their implementation of rotational grazing systems by resting for up to 17 months the pastures used by nesting sage-grouse within 488 000 ha inside Montana's PACs (J. Siddoway pers. comm.). Our findings suggest that these types of grazing systems that promote nest success may provide one mechanism to offset population losses by increasing bird numbers.

*Acknowledgements* – We thank landowners in the PRB that granted access to private lands. J. Hess, K. Keith, D. Nonne and F. Sutti provided outstanding leadership and assistance in the field. Major

funding for this work came from Bureau of Land Management (BLM) offices in Montana and Wyoming. Additional support came from the BLM (Washington DC), US Dept of Energy, Montana Dept of Fish, Wildlife and Parks, Wyoming Game and Fish Dept, National Fish and Wildlife Foundation, National Science Foundation (EPS-CORE program), Montana Cooperative Wildlife Research Unit, Petroleum Association of Wyoming, Western Gas Resources Inc., Wolf Creek Charitable Foundation, Bighorn Environmental Consulting, Anheuser-Busch Companies, Inc. and the Univ. of Montana. The views of the lead author are his own and do not necessarily represent the USFWS.

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Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Fwd: Habitat Objectives Drop In Language**

1 message

**Foss, Jeffery** <jfoss@blm.gov>

Thu, Apr 23, 2015 at 3:21 PM

To: Amy Lueders &lt;alueders@blm.gov&gt;

Cc: Stephanie Carman &lt;scarman@blm.gov&gt;, "Melvin (Joe) Tague" &lt;jtague@blm.gov&gt;, Kurt R Wiedenmann &lt;kwiedenmann@blm.gov&gt;, Brent Ralston &lt;bralston@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;, jeff foss &lt;jfoss@blm.gov&gt;

Amy

We have reviewed the language sent this AM and have feedback/suggested edits. If you have questions, either Brent or I can explain our recommended language.

Thanks for the opportunity to provide feedback

Jeff

**Jeff Foss****Acting State Director-Idaho BLM****1387 S. Vinnell Way, Boise, ID 83709****208-373-3800 or 373-4001**[jfoss@blm.gov](mailto:jfoss@blm.gov)

—— Forwarded message ——

From: **Ralston, Brent** <bralston@blm.gov>

Date: Thu, Apr 23, 2015 at 3:04 PM

Subject: Habitat Objectives Drop In Language

To: Jeffery Foss &lt;jfoss@blm.gov&gt;

Cc: Jon Beck &lt;jmbeck@blm.gov&gt;, Kurt Wiedenmann &lt;kwiedenmann@blm.gov&gt;

Jeff,

Here are some comments/edits on the drop in language that's been shared this morning. There are two files attached which include what would be in the Idaho plan direction/decision – a track changes version and a clean version, both with comments describing the rationale for any adjustments that were made.

These have incorporated the habitat objectives table language into these documents. We like the version which included the statement –



**“The habitat objectives will be part of the sage-grouse habitat assessment to be used during land health evaluations (see Monitoring Framework, Appendix X).” Which helps define what they are applicable to. This in conjunction with the recommended wording change for the previous sentence to “These habitat indicators are consistent with existing indicators used by the BLM to assess GRSG habitat” help clarify, in our minds, what these are used for and helps broaden their applicability which clearly describing how they are used in the grazing program context.**

**In addition the bullet for lek buffers that reads -**

-

**“Range improvements which do not impact or which provide a conservation benefit to sage-grouse, such as fences for protecting important seasonal habitats, meet the lek buffer requirement.”**

**We think should be changed to read –**

**Range improvements which do not impact or which provide a conservation benefit to sage-grouse, such as fences for protecting important seasonal habitats, would be exempt from the lek buffer requirement.**

**The reason for this is that really an optics – the first statement implies that such improvements meet the buffer (distance) requirement even though they may not conform to that distance requirement, where the second sentence portrays more the meaning that is such structures meet those requirements then they would be exempt from the buffer (distance) criteria.**

-

**Brent Ralston  
Project Lead  
Jarbidge Grazing Permit Team  
Idaho State Office  
208-373-3812**

---

**2 attachments**



**Idaho Recommendations.docx**  
19K



**Idaho Recommendations Clean.docx**  
18K

**Revised language from our most recent document Review – This version includes drop in language from Vicki Herren.**

HM-OBJ-2: Incorporate GRSG Seasonal Habitat Objectives (Table 2-3) into the design of projects or activities, as appropriate, based on site conditions and ecological potential, unless achievement of fuels management objectives require additional reduction in sagebrush cover to meet strategic protection of GRSG habitat and conserve habitat quality for the species or at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:

A specific objective is not applicable to the site-specific conditions of the project or activity;

An alternative objective is determined to provide equal or better protection for GRSG or its habitat (based on appropriate scientific findings); or

Analysis concludes that following a specific objective would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.

The Habitat Objectives for Greater Sage-Grouse (Table XX) are a list of indicators and values that describe desired Greater Sage-Grouse seasonal habitat conditions. The values for the indicators were derived using a synthesis of current local and regional GRSG habitat research and data and reflect variability of ecological sites. These habitat indicators cover indicators are consistent with existing indicators used by the BLM to assess GRSG habitat.

The habitat objectives will be part of the sage-grouse habitat assessment to be used during land health evaluations (see Monitoring Framework, Appendix X). These habitat objectives may not be obtainable or desired uniformly across the designated GRSG habitat management areas. For an assessment area, the determination on whether the objectives have been met, or making progress toward meeting, will be based on the area's landscape context and ecological ability to meet the indicators.

When determining if an area-site is meeting habitat objectives, the measurements from that are a particular site will be assessed based on the range of values for the indicators in the habitat objectives table. The habitat objectives table is one component of sage-grouse multi-scale habitat assessment (see Monitoring Framework, Appendix X). The results of which the habitat assessment will be used during the land health evaluation to ascertain if the land health standard applicable to sage-grouse habitat (e.g., special status species habitat standard) is being met.

~~When authorizing activities in sage-grouse habitat, the BLM will consider if habitat objectives are being achieved. If the habitat objectives are not being achieved, and the site has the potential for achieving these~~

~~objectives, the BLM will determine the causal factor(s) and make the necessary management adjustments to address the causal factor(s), following current BLM regulations and policy.~~

TABLE Deleted JMB

**Revised language from our most recent document Review – This version includes drop in language from Vicki Herren.**

HM-OBJ-2: Incorporate GRSG Seasonal Habitat Objectives (Table 2-3) into the design of projects or activities, as appropriate, based on site conditions and ecological potential, unless achievement of fuels management objectives require additional reduction in sagebrush cover to meet strategic protection of GRSG habitat and conserve habitat quality for the species or at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:

A specific objective is not applicable to the site-specific conditions of the project or activity;

An alternative objective is determined to provide equal or better protection for GRSG or its habitat (based on appropriate scientific findings); or

Analysis concludes that following a specific objective would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.

The Habitat Objectives for Greater Sage-Grouse (Table XX) are a list of indicators and values that describe desired Greater Sage-Grouse seasonal habitat conditions. The values for the indicators were derived using a synthesis of current local and regional GRSG habitat research and data and reflect variability of ecological sites. These habitat indicators are consistent with existing indicators used by the BLM to assess GRSG habitat.

The habitat objectives will be part of the sage-grouse habitat assessment to be used during land health evaluations (see Monitoring Framework, Appendix X). These habitat objectives may not be obtainable or desired uniformly across the designated GRSG habitat management areas. For an assessment area, the determination on whether the objectives have been met, or making progress toward meeting, will be based on the area's landscape context and ecological ability to meet the indicators.

When determining if an area is meeting habitat objectives, the measurements from that area will be assessed based on the range of values for the indicators in the habitat objectives table. The habitat objectives table is one component of sage-grouse multi-scale habitat assessment (see Monitoring Framework, Appendix X). The results of which will be used during the land health evaluation to ascertain if the land health standard applicable to sage-grouse habitat (e.g., special status species habitat standard) is being met.

TABLE Deleted JMB



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## Fwd: Sage Grouse Letter

1 message

Jeffery Foss &lt;jfoss@blm.gov&gt;

Tue, Jun 16, 2015 at 8:31 AM

To: Peter Ditton &lt;pditton@blm.gov&gt;

Cc: Brent Ralston &lt;bralston@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;, Anne Briggs &lt;anne.briggs@sol.doi.gov&gt;

FYI

Highs in the 60s today in Eureka.

Thanks

Jeff

Sent from my iPhone

Begin forwarded message:

**From:** Steven Ellis <sellis@blm.gov>**To:** Jeffery Foss <jfoss@blm.gov>**Subject:** Fwd: Sage Grouse Letter

Sent from my iPhone

Begin forwarded message:

**\*From:\*** "Lyons, James" <james\_lyons@ios.doi.gov>**\*To:\*** Sarah Greenberger <sarah\_greenberger@ios.doi.gov>, Michael Bean <michael\_bean@ios.doi.gov>, John Blair <john\_blair@ios.doi.gov>, Sarah Neimeyer <sarah\_neimeyer@ios.doi.gov>, Stephenne Harding <stephenne\_harding@ios.doi.gov>, Tommy Beaudreau <tommy\_beaudreau@ios.doi.gov>, Neil Komze <nkomze@blm.gov>, Dan Ashe <d\_m\_ashe@fws.gov>, Steven Ellis <sellis@blm.gov>**\*Subject:\*** "Fwd: FW: Sage Grouse Letter"

In case you haven't seen this?

Jim

----- Forwarded message -----

**From:** Moore, Virgil <virgil.moore@idfg.idaho.gov>**Date:** Tue, Jun 16, 2015 at 10:14 AM**Subject:** FW: Sage Grouse Letter**To:** "Lyons, James" <james\_lyons@ios.doi.gov>

Jim

Per my phone message, the letter the Governor signed yesterday.

Virgil

—  
\*Jim Lyons\*  
\*Deputy Assistant Secretary\*  
\*Land and Minerals Management\*  
\*Jim\_Lyons@ios.doi.gov\* <Jim\_Lyons@ios.doi.gov>  
\*202-208-4318 (direct)\*  
\*202-815-4412 (mobile)\*



**6.15.15 Sage Grouse Letter to Crapo and Risch.pdf**  
944K





However, when the BLM recently announced their proposed plan and Environmental Impact Statement (EIS) for sage-grouse habitat, I was disappointed that significant new information was included which was not part of the co-preferred alternative plan. What's more, I am concerned about such critically important issues as the dozens of required design features for conservation projects, the unstated and still unknown mitigation requirements, and restrictions on state and private land overlaying federal minerals.

Idaho needs a chance to implement its plan and prove its merits. H.R. 1735 and the Lee/Crapo/Inhofe Amendment can play an important role in that effort. I am especially interested in the Lee/Crapo/Inhofe provisions related to a ten-year extension of time for State management of sage-grouse in the Senate NDAA. Mountain Home Air Force Base and our other military training facilities in Idaho should not be hampered with a federal plan that, unlike the Idaho plan, treats secondary-threats as primary threats, creating unnecessary restrictions on multiple uses of federal land, including mining and grazing.

Thank you for your consideration and assistance in achieving our shared goals. Please do not hesitate to contact me with any questions or concerns.

As Always – Idaho “Esto Perpetua”

A handwritten signature in black ink, appearing to read "C. L. Butch Otter". The signature is written in a cursive, flowing style.

C. L. "Butch" Otter  
Governor of Idaho

cc: Congressman Raul Labrador  
Congressman Mike Simpson



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## high voltage transmission line drop-in

1 message

---

Hildner, Michael <mhildner@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>  
Cc: Lauren Mermejo <lmermejo@blm.gov>

Mon, Feb 9, 2015 at 12:39 PM

Hi Jon,

Thanks for bringing that error to my attention. The correct guidance is below. I've also updated the WO files, so it has the right guidance:

For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and **Important Habitat Management Areas (IHMA)s** are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”*

—  
Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
[mhildner@blm.gov](mailto:mhildner@blm.gov)



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Corrected GRSG Resolved Issues Document\_v2

1 message

Hildner, Michael &lt;mhildner@blm.gov&gt;

Tue, Feb 3, 2015 at 1:04 PM

To: Jonathan Beck <jmbeck@blm.gov>, Johanna Munson <jmunson@blm.gov>, Brent Ralston <bralston@blm.gov>, Jeffery Foss <jfoss@blm.gov>, Timothy Murphy <tmurphy@blm.gov>  
Cc: Edwin Roberson <eroberso@blm.gov>, Glen Stein <gstein@fs.fed.us>, "Dillon, Madelyn -FS" <mdillon@fs.fed.us>, Stephanie Carman <scarman@blm.gov>, Frank Quamen <fquamen@blm.gov>

Hi BLM-ID,

In coordinating with FS, we noticed that the GRSG guidance document you received was missing one piece of direction. I have added the following bullet point to your SFA guidance :

"· Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)—these areas will be treated as PHMA, with the SFA management actions for this FS-land."

I've also attached a map that specifically identifies these two areas for your reference (please ignore all the other identified areas on the map with regard to the above bullet point).

I have reattached the guidance for purposes of version control, but this is the only change you will see in it. Sorry about the oversight, and thanks a lot as always. Let me know if you have any questions.

—

Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
[mhildner@blm.gov](mailto:mhildner@blm.gov)

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### 2 attachments











SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_NCID\_Named.pdf  
396K

Issues Resolved\_ID 2.3.15 final.docx  
229K

# Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas

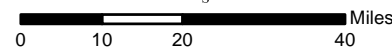
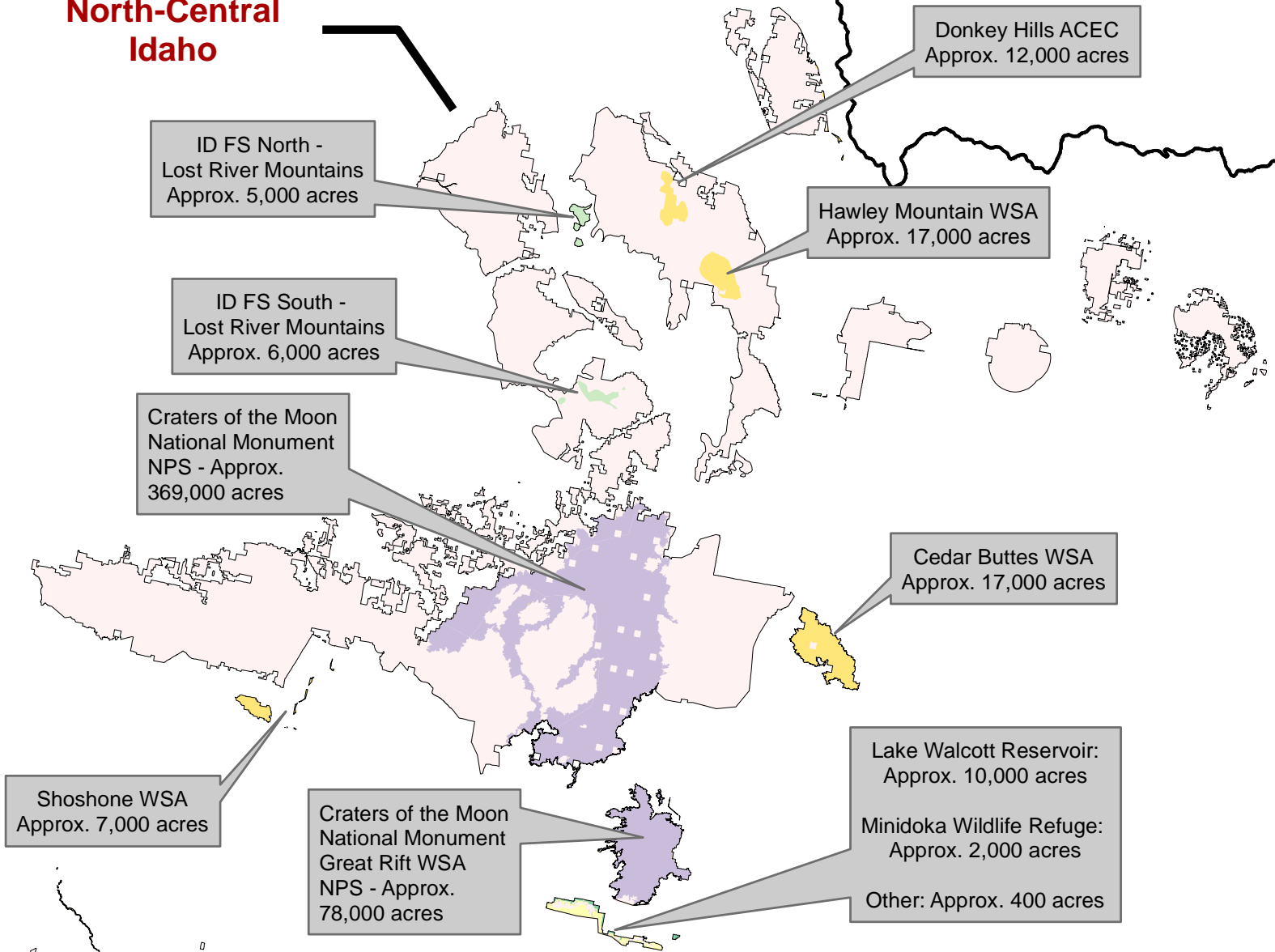
## - North Central Idaho

### Legend

-  FWS Areas of Significance / Sagebrush Focal Areas
- Surface Management Agency**
-  Non-Habitat, Bureau of Land Management
-  Non-Habitat, US Fish and Wildlife Service
-  Non-Habitat, Forest Service
-  Non-Habitat, National Park Service
-  Non-Habitat, Bureau of Reclamation
-  Non-Habitat, State
-  Non-Habitat, Private
-  Non-Habitat, Other/ Undetermined
-  ADPP Habitat or Non-Habitat Outside of BLM Surface/ Subsurface Management

**Data Sources:**  
**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014. \*Only surface estate is used for classification in NV, OR and CA.  
**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.  
**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.  
**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).

## North-Central Idaho



IDM71\_0000619

***BLM-IDAHO***

**Greater Sage-Grouse Planning Issues for the BLM Planning Teams to Insert and Analyze in Administrative Draft Proposed Plan (ADPP)**

**January 30, 2015**

*The March 4, 2010 decision by the U.S. Fish and Wildlife Service that the greater sage-grouse warranted listing but was precluded [Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to list the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered] set in motion the most comprehensive land-use planning initiative in the BLM's history.*

*In 2011, the BLM began updating land-use plans across the West so as to ensure not only the long-term viability of the greater sage-grouse on public lands and the continued economic vitality of the West. This has been a complex and demanding process involving collaboration with an unprecedented number of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service and many others. The BLM's mandate of multiple use and sustained yield has required us to balance the full range of resource uses on public lands, including the conservation of crucial wildlife habitat. As we have worked through this process, public land managers throughout the BLM have made difficult resource management decisions.*

*These documents provide key guidance that will enable the BLM to finalize land use plans that will contribute to the conservation of the Greater Sage-Grouse and other sagebrush associated species across the West. The guidance outlines a suite of tools, such as disturbance limits in key habitats and mitigation approaches, which will help us to reach this goal. These mechanisms will work in concert to conserve sage-grouse habitat so that we can achieve our twin goals of thriving Greater Sage-Grouse populations and robust Western economies.*

***Issue:***

**Development in Highly Important Landscapes**

***Direction:***

As more specifically provided in this guidance, the ADPP will include Sagebrush Focal Areas (SFA), consisting of the BLM and FS-managed lands within the area depicted in the October 27, 2014 USFWS memo, *Greater Sage-Grouse: Additional Recommendation to Refine Land Use Allocations in Highly Important Landscapes*. In the Special Status Species Section of Chapter 2, include the following management action drop in language (for the Proposed Plan only):

*“Designate Sagebrush Focal Areas (SFA) as shown on Map X (x acres). SFAs will be managed as PHMA, with the following additional management:*

- 1) Recommended for withdrawal from the General Mining Act of 1872, subject to valid existing rights.*
- 2) Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.*

- 3) *Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."*

**The NOC will provide updated shapefiles that delineate the SFAs.**

Except as otherwise provided below, the ADPP will provide that all BLM- and FS-managed lands (including subsurface) within SFAs will be allocated and managed as PHMA and include the management actions above.

- *Do Not Include the following in SFA Management*
  - Hawley Mountain WSA (ID), Shoshone WSA (ID), Cedar Buttes WSA (ID), Lower Salmon Falls Creek (ID), Little Jack Wilderness (ID), Bruneau-Jarbidge Wilderness (ID) in non-habitat – The current management in these areas is generally protective of GRSG. As applicable, these will continue to be managed so as not to impair their suitability for preservation as wilderness, or under the terms of the Wilderness Act to preserve wilderness character.
    - To the extent that these areas were analyzed for contingent management as general or priority habitat, the ADPP will include contingent allocations and management direction that would apply in the event that Congress releases the areas from WSA status
  - Non-habitat areas outside Little Jack and Bruneau-Jarbidge Wilderness and Salmon Falls Creek ACEC which were previously shown within the SFA –These areas will not be managed as PHMA or SFA.
- Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)– these areas will be treated as PHMA, with the SFA management actions for this FS-land.
- Do Include Donkey Hills ACEC –In order to consolidate parcels for protection as SFAs, this area will be treated as PHMA and included for SFA management.
- *Do Not Include Other Agency Land in SFA Management* – while lands managed by other agencies will be shown on the SFA maps, BLM ADPP decisions will not be applied to them.
- *Do Not Include Private/State Lands in SFA Management* – while private lands may be within the SFA boundaries, ADPP decisions will not be applied to them, but may apply to Federal subsurface underlying such lands as provided below.
- *Subsurface Estate:*
  - Under private/state lands: subsurface estate in PHMA and GHMA should be treated as PHMA with SFA management actions.

- Under other Federal lands: subsurface state should be treated as PHMA with SFA management actions if it is not already withdrawn (such as in Refuges or Parks) and PHMA or GHMA management was analyzed in the DEIS.

Additional direction/drop in language for the ADPPs on SFAs will be forthcoming.

**Issue:**

**Direction:**

**Mitigation**

The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In all sage-grouse habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:**

**Direction:**

**Mapping**

Not Applicable

**Issue:**

**Direction:**

**Disturbance**

Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance (see Attachment II).

Planning units will include the following land use plan actions within their ADPPs that states:

- a. If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid*

*existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*

- b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

**Issue:**

**Direction:**

**Vegetation Objectives**

The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

**Issue:**

**Direction:**

**Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas,*



*including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*

- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

***Issue:***

***Direction:***

**Mineral Materials (Salable Minerals)**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

***Issue:***

***Direction:***

**High-voltage Transmission and Major Pipeline ROWs and Corridors**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that

are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”*

**Issue:** Coal Suitability  
**Direction:** Not Applicable in Idaho

**Issue:** Fluid Mineral Resources (Including Geothermal)  
**Direction:** All ADPPs will include the following as a conservation objective:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h).”*

*“Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.”*

**Issue:** No Surface Occupancy (NSO) Exception Language  
**Direction:** Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new fluid mineral

leases at the time of leasing only and may not be applied to existing fluid mineral leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*“No waivers or modifications to a fluid mineral lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action’s impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.”*

**Issue:**

**Direction:**

**Adaptive Management**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

***Issue:***

***Direction:***

**Application of Lek Buffers**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment IV) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review ([Open File Report 2014-1239](#)) in accordance with Appendix X.”*

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<b>Idaho/SW MT*</b>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion <i>Imp – Avoid</i>
<b>Wind – General</b>	Open <i>Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open

Attachment I

**GREATER SAGE-GROUSE RMPA/FEIS  
TEMPLATE LANGUAGE FOR ADDRESSING  
MITIGATION**

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

**Chapter 1 - Introduction**

[Nothing new to add to EIS]

**Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]**

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

**Mitigation**

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.

avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and



compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.

- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- **Compensatory Mitigation Options**
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- **Compensatory Mitigation Siting**
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- **Compensatory Mitigation Project Types and Costs**
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- **Compensatory Mitigation Compliance and Monitoring**
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

Durability (protective and ecological): the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Disturbance Caps Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use of locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER analysis in the land use plans (Chapter 2, Affected Environment) and the use of the “west-wide” sagebrush availability and habitat degradation data/estimates for the Priority Habitat Management Areas in each population for monitoring and management purposes as the LUPs are being implemented.
- VII. Provide guidance on what is considered in the disturbance calculations versus what is considered for the disturbance cap.

#### **Guidance**

- I. Planning units will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*
  - b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain*

*the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

- II. Use of west-wide habitat degradation data as well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use the west-wide data at a minimum and/or locally collected disturbance data as available (e.g., DDCT) for the anthropogenic disturbance types listed in Table 1.
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 7 additional features that are considered threats to sage-grouse (Table 2). Using 1 meter resolution NAIP imagery is recommended. Use local data if available.
- IV. Fire-burned and habitat treatment areas will not be included in the project scale degradation disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
- V. Planning units are directed to use a density cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is on average less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than an average of 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area (*subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.*).
  - Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments)

- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the Affected Environment section of the proposed plans/ FEISs. West-wide sagebrush availability and habitat degradation data layers will be used for the Priority Habitat Management Areas in each population for monitoring (see the GRSG Monitoring Framework in the Monitoring Appendix of the EIS) and management purposes as the LUPs are being implemented. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.
- VII. Planning units are directed to use the three measures (sagebrush availability, habitat degradation, density of energy and mining) in conjunction with other information during the NEPA process to most effectively site project locations, such as by clustering disturbances and/or locating facilities in already disturbed areas. Although locatable mine sites are included in the degradation calculation, mining activities under the 1872 mining law may not be subject to the 3% disturbance cap. Details about locatable mining activities should be fully disclosed and analyzed in the NEPA process to assess impacts to sage-grouse and their habitat as well as to BLM goals and objectives, and other BLM programs and activities.

### **Additional Information/Formulas**

A collaborative effort in Idaho developed a disturbance calculation method that includes the 3% disturbance cap plus a modifier that includes effective habitat and is described in Appendix G of their ADPP. The formulas below are excerpted from that Appendix.

Disturbance Calculations for the BSU:

$$\begin{aligned} & \text{Disturbance Percentage} \\ & = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^1}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within the BSU}}{\text{Acres within the BSU}} + 0.3 \right)} \right) \times 100 \end{aligned}$$



Disturbance Calculations for Project Analysis Areas (PAAs):

$$\text{Disturbance Percentage} = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^{12}}{\text{Acres within the PAA} * \left( \frac{\text{Acres of Effective Habitat within the PAA}}{\text{Acres within the PAA}} + 0.3 \right)} \right) \times 100$$

<sup>1</sup> see Table 3. <sup>2</sup> see Table 2.

Project analysis area (PAA) method for permitting surface disturbance activities:

1. Determine potentially affected occupied leks by placing a four-mile buffer around the project boundary as defined by the proposed area of physical disturbance related to the project. All occupied leks within this buffer will be considered affected by the proposed project.
2. Next place a four mile boundary around each of the occupied leks identified in item 1, above.
3. The polygon formed by the merging and dissolving of polygons from step 1 and 2 creates the Project Analysis Area (PAA) for surface disturbance activities.
4. Map existing disturbances within the analysis area or use locally available spatial data. Use of digitized NAIP imagery is recommended.
5. Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
6. Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
7. Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1 facility per 640 acres, averaged across project analysis area, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1 facility per 640 acres, averaged across the project analysis area, either defer the proposed project or co-locate it into existing disturbed area.
8. If a project that would exceed the degradation cap or density cap cannot be deferred due to valid existing rights or other existing laws and regulations, fully disclose the local and regional impacts of the proposed action in the associated NEPA.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

**Table 2.** The seven additional features to include in the disturbance calculation at the project scale

<ol style="list-style-type: none"> <li>1. Coalbed Methane Ponds</li> <li>2. Meteorological Towers</li> <li>3. Nuclear Energy Facilities</li> <li>4. Airport Facilities and Infrastructure</li> <li>5. Military Range Facilities &amp; Infrastructure</li> <li>6. Hydroelectric Plants</li> <li>7. Recreation Areas Facilities and Infrastructure</li> </ol>
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**Table 3.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

## **Background**

In the USFWS's 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse's habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 7 types of features that are threats to sage-grouse will be used in the project analysis areas.

		Scales		
		Broad/Mid (Populations)	Intermediate (BSU)	Local/Project (Seas. Hab.)
Habitat Degradation	Unit:	WAFWA Populations	Biologically Significant Unit	Project/Local Habitat Area <sup>5</sup>
	Area of Interest:	PHMAs	PHMAs	PHMAs
	Data:	Westwide degradation data	Westwide <sup>2</sup> , State, Local	State, Local
	Formula (Measure 2a):	<u>12 Degradation Threats</u> PHMAs in Populations	<u>12 Degradation Threats</u> PHMAs in BSUs	<u>12 Degradation Threats + 7<sup>7</sup></u> PHMAs in Proj. <sup>5</sup>
	Management:	Internal BLM & FS estimates	3% Cap, Adapt. Mgmt <sup>4</sup>	3% Disturbance Cap
	All Lands:	Yes	Yes	Yes
	Fire Included:	No	No	No
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	State Offices <sup>3</sup> or Field Offices
Sagebrush Availability	Unit:	WAFWA Populations	Biologically Significant Unit	n/a
	Area of Interest:	PHMAs	PHMAs	
	Data:	LANDFIRE Updated EVT	Updated EVT or State data	
	Formula (Measure 1a):	<u>Existing Updated Sagebrush</u> PHMAs in Populations	<u>Existing Updated Sagebrush</u> PHMAs in BSUs	
	Management:	Internal BLM & FS estimates	Adaptive Management <sup>4</sup>	
	All Lands:	Yes	Yes	
	Fire Included:	Yes	Yes	
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	
Energy and Mining	Unit:	WAFWA Populations	n/a	Project Area & Seasonal Hab.
	Area of Interest:	PHMAs		PHMAs
	Data:	Westwide well & mine data		Westwide <sup>2</sup> , State data
	Formula (Measure 3):	<u>Well Pads and Mines</u> <sup>1</sup> Square Mile		<u>Well Pads and Mines</u> <sup>1</sup> Square Mile
	Management:	Internal BLM & FS estimates		Project Authorization
	All Lands:	Yes		Yes
	Fire Included:	No		No
	Who:	BLM NOC		BLM NOC or SOs or FOs
<b>ACRONYMS</b>				
PHMA = Priority Habitat Management Area      BSU = Biologically Significant Unit				
EVT = Existing Vegetation Type                      BpS = Areas of Biotic Potential				
<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.				
<sup>2</sup> Westwide data will be used only if state or local data are not available.				
<sup>3</sup> This footnote was removed from the table. January 2015.				
<sup>4</sup> This may be one of several variables used to inform Adaptive Management. The BSU is the scale at which Adaptive Management will be applied.				
<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data/analysis should be used for Adaptive Management				
<sup>6</sup> The project analysis area will be based on a 4-mile radius polygon around the project area combined with a 4-mile buffer around any leaks within the project boundary in PHMA (Idaho methodology).				
<sup>7</sup> See Table 2				

## Attachment III

# Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance

### Purpose

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

### Guidance

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.



## Attachment IV

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in

grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

**Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSG RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSG habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSG habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

Attachment V

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*

Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

  - linear features (roads) within 3.1 miles of leks
  - infrastructure related to energy development within 3.1 miles of leks.
  - tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
  - low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
  - surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
  - noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis.

  - Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
  - If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
    - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater

level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).

- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Re: We read but we didn't see....**

1 message

Hildner, Michael &lt;mhildner@blm.gov&gt;

Thu, Feb 12, 2015 at 7:42 AM

To: "Beck, Jonathan" &lt;jmbeck@blm.gov&gt;, Stephanie Carman &lt;scarman@blm.gov&gt;

Cc: Lauren Mermejo &lt;lmermejo@blm.gov&gt;

Hi Jon,

Thanks for bringing the oversight to my attention. Attached is the corrected guidance, which makes clear that the lek buffer and fluid mineral prioritization guidance needs to be applied in IHMA also.

Thanks,  
Michael

On Thu, Feb 12, 2015 at 9:31 AM, Beck, Jonathan <jmbeck@blm.gov> wrote:

Michael, as we were working with the final issues resolution language we found a few more instances where the language in the allocation was not consistent with the allocation table and Idaho's 3-tired habitat mapping. These are the same as the issue we discussed earlier for transmission lines. Please see the attached language with track changes edits and comments. The areas needing your attention are fluid minerals and lek buffers. Thanks, Jon

--

Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

--

Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
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Issues Resolved\_ID 2.12.15 final.docx  
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- 3) *Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."*

**The NOC will provide updated shapefiles that delineate the SFAs.**

Except as otherwise provided below, the ADPP will provide that all BLM- and FS-managed lands (including subsurface) within SFAs will be allocated and managed as PHMA and include the management actions above.

- *Do Not Include the following in SFA Management*
  - Hawley Mountain WSA (ID), Shoshone WSA (ID), Cedar Buttes WSA (ID), Lower Salmon Falls Creek (ID), Little Jack Wilderness (ID), Bruneau-Jarbidge Wilderness (ID) in non-habitat – The current management in these areas is generally protective of GRSG. As applicable, these will continue to be managed so as not to impair their suitability for preservation as wilderness, or under the terms of the Wilderness Act to preserve wilderness character.
    - To the extent that these areas were analyzed for contingent management as general or priority habitat, the ADPP will include contingent allocations and management direction that would apply in the event that Congress releases the areas from WSA status
  - Non-habitat areas outside Little Jack and Bruneau-Jarbidge Wilderness and Salmon Falls Creek ACEC which were previously shown within the SFA –These areas will not be managed as PHMA or SFA.
- Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)– these areas will be treated as PHMA, with the SFA management actions for this FS-land.
- Do Include Donkey Hills ACEC –In order to consolidate parcels for protection as SFAs, this area will be treated as PHMA and included for SFA management.
- *Do Not Include Other Agency Land in SFA Management* – while lands managed by other agencies will be shown on the SFA maps, BLM ADPP decisions will not be applied to them.
- *Do Not Include Private/State Lands in SFA Management* – while private lands may be within the SFA boundaries, ADPP decisions will not be applied to them, but may apply to Federal subsurface underlying such lands as provided below.
- *Subsurface Estate:*
  - Under private/state lands: subsurface estate in PHMA and GHMA should be treated as PHMA with SFA management actions.

- Under other Federal lands: subsurface state should be treated as PHMA with SFA management actions if it is not already withdrawn (such as in Refuges or Parks) and PHMA or GHMA management was analyzed in the DEIS.

Additional direction/drop in language for the ADPPs on SFAs will be forthcoming.

**Issue:**

**Direction:**

**Mitigation**

The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In all sage-grouse habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:**

**Direction:**

**Mapping**

Not Applicable

**Issue:**

**Direction:**

**Disturbance**

Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance (see Attachment II).

Planning units will include the following land use plan actions within their ADPPs that states:

- a. If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid*

*existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*

- b. If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

**Issue:**

**Direction:**

**Vegetation Objectives**

The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

**Issue:**

**Direction:**

**Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas,*

*including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*

- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

***Issue:***

***Direction:***

**Mineral Materials (Salable Minerals)**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

***Issue:***

***Direction:***

**High-voltage Transmission and Major Pipeline ROWs and Corridors**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that

are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and Important Habitat Management Areas (IHMA) are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”*

**Issue:** Coal Suitability  
**Direction:** Not Applicable in Idaho

**Issue:** Fluid Mineral Resources (Including Geothermal)  
**Direction:** All ADPPs will include the following as a conservation objective:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA, IHMA, and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA, IHMA, and GHMA, and subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h).”*

*“Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.”*

**Issue:** No Surface Occupancy (NSO) Exception Language  
**Direction:** Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new fluid mineral

leases at the time of leasing only and may not be applied to existing fluid mineral leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*“No waivers or modifications to a fluid mineral lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action’s impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.”*

**Issue:**

**Direction:**

**Adaptive Management**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

***Issue:***

***Direction:***

**Application of Lek Buffers**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA, IHMA, and PHMA (see Attachment IV) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review (Open File Report 2014-1239) in accordance with Appendix X.”*

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<i>Idaho/SW MT*</i>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion <i>Imp – Avoid</i>
<b>Wind – General</b>	Open <i>Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open



## Attachment I

# GREATER SAGE-GROUSE RMPA/FEIS TEMPLATE LANGUAGE FOR ADDRESSING MITIGATION

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

## Chapter 1 - Introduction

[Nothing new to add to EIS]

## Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

## Mitigation

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.

avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and

compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.

- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- Compensatory Mitigation Options
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- Compensatory Mitigation Siting
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- Compensatory Mitigation Project Types and Costs
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- Compensatory Mitigation Compliance and Monitoring
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

**Durability (protective and ecological):** the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).



## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Disturbance Caps Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use of locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER analysis in the land use plans (Chapter 2, Affected Environment) and the use of the “west-wide” sagebrush availability and habitat degradation data/estimates for the Priority Habitat Management Areas in each population for monitoring and management purposes as the LUPs are being implemented.
- VII. Provide guidance on what is considered in the disturbance calculations versus what is considered for the disturbance cap.

#### **Guidance**

- I. Planning units will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*
  - b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain*

*the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

- II. Use of west-wide habitat degradation data as well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use the west-wide data at a minimum and/or locally collected disturbance data as available (e.g., DDCT) for the anthropogenic disturbance types listed in Table 1.
  
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 7 additional features that are considered threats to sage-grouse (Table 2). Using 1 meter resolution NAIP imagery is recommended. Use local data if available.
  
- IV. Fire-burned and habitat treatment areas will not be included in the project scale degradation disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
  
- V. Planning units are directed to use a density cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is on average less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than an average of 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area (*subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.*).
  - Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments)

- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the Affected Environment section of the proposed plans/ FEISs. West-wide sagebrush availability and habitat degradation data layers will be used for the Priority Habitat Management Areas in each population for monitoring (see the GRSG Monitoring Framework in the Monitoring Appendix of the EIS) and management purposes as the LUPs are being implemented. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.
- VII. Planning units are directed to use the three measures (sagebrush availability, habitat degradation, density of energy and mining) in conjunction with other information during the NEPA process to most effectively site project locations, such as by clustering disturbances and/or locating facilities in already disturbed areas. Although locatable mine sites are included in the degradation calculation, mining activities under the 1872 mining law may not be subject to the 3% disturbance cap. Details about locatable mining activities should be fully disclosed and analyzed in the NEPA process to assess impacts to sage-grouse and their habitat as well as to BLM goals and objectives, and other BLM programs and activities.

### **Additional Information/Formulas**

A collaborative effort in Idaho developed a disturbance calculation method that includes the 3% disturbance cap plus a modifier that includes effective habitat and is described in Appendix G of their ADPP. The formulas below are excerpted from that Appendix.

Disturbance Calculations for the BSU:

$$\begin{aligned} & \text{Disturbance Percentage} \\ & = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^1}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within the BSU}}{\text{Acres within the BSU}} + 0.3 \right)} \right) \times 100 \end{aligned}$$

Disturbance Calculations for Project Analysis Areas (PAAs):

$$\text{Disturbance Percentage} = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^{1,2}}{\text{Acres within the PAA} * \left( \frac{\text{Acres of Effective Habitat within the PAA}}{\text{Acres within the PAA}} + 0.3 \right)} \right) \times 100$$

<sup>1</sup> see Table 3. <sup>2</sup> see Table 2.

Project analysis area (PAA) method for permitting surface disturbance activities:

1. Determine potentially affected occupied leks by placing a four-mile buffer around the project boundary as defined by the proposed area of physical disturbance related to the project. All occupied leks within this buffer will be considered affected by the proposed project.
2. Next place a four mile boundary around each of the occupied leks identified in item 1, above.
3. The polygon formed by the merging and dissolving of polygons from step 1 and 2 creates the Project Analysis Area (PAA) for surface disturbance activities.
4. Map existing disturbances within the analysis area or use locally available spatial data. Use of digitized NAIP imagery is recommended.
5. Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
6. Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
7. Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1 facility per 640 acres, averaged across project analysis area, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1 facility per 640 acres, averaged across the project analysis area, either defer the proposed project or co-locate it into existing disturbed area.
8. If a project that would exceed the degradation cap or density cap cannot be deferred due to valid existing rights or other existing laws and regulations, fully disclose the local and regional impacts of the proposed action in the associated NEPA.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

**Table 2.** The seven additional features to include in the disturbance calculation at the project scale

<ol style="list-style-type: none"> <li>1. Coalbed Methane Ponds</li> <li>2. Meteorological Towers</li> <li>3. Nuclear Energy Facilities</li> <li>4. Airport Facilities and Infrastructure</li> <li>5. Military Range Facilities &amp; Infrastructure</li> <li>6. Hydroelectric Plants</li> <li>7. Recreation Areas Facilities and Infrastructure</li> </ol>
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**Table 3.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

## **Background**

In the USFWS's 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse's habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 7 types of features that are threats to sage-grouse will be used in the project analysis areas.

		Scales		
		Broad/Mid (Populations)	Intermediate (BSU)	Local/Project (Seas. Hab.)
Habitat Degradation	Unit:	WAFWA Populations	Biologically Significant Unit	Project/Local Habitat Area <sup>5</sup>
	Area of Interest:	PHMAs	PHMAs	PHMAs
	Data:	Westwide degradation data	Westwide <sup>2</sup> , State, Local	State, Local
	Formula (Measure 2a):	<u>12 Degradation Threats</u> PHMAs in Populations	<u>12 Degradation Threats</u> PHMAs in BSUs	<u>12 Degradation Threats + 7<sup>7</sup></u> PHMAs in Proj. <sup>5</sup>
	Management:	Internal BLM & FS estimates	3% Cap, Adapt. Mgmt <sup>4</sup>	3% Disturbance Cap
	All Lands:	Yes	Yes	Yes
	Fire Included:	No	No	No
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	State Offices <sup>3</sup> or Field Offices
Sagebrush Availability	Unit:	WAFWA Populations	Biologically Significant Unit	n/a
	Area of Interest:	PHMAs	PHMAs	
	Data:	LANDFIRE Updated EVT	Updated EVT or State data	
	Formula (Measure 1a):	<u>Existing Updated Sagebrush</u> PHMAs in Populations	<u>Existing Updated Sagebrush</u> PHMAs in BSUs	
	Management:	Internal BLM & FS estimates	Adaptive Management <sup>4</sup>	
	All Lands:	Yes	Yes	
	Fire Included:	Yes	Yes	
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	
Energy and Mining	Unit:	WAFWA Populations	n/a	Project Area & Seasonal Hab.
	Area of Interest:	PHMAs		PHMAs
	Data:	Westwide well & mine data		Westwide <sup>2</sup> , State data
	Formula (Measure 3):	<u>Well Pads and Mines</u> <sup>1</sup> Square Mile		<u>Well Pads and Mines</u> <sup>1</sup> Square Mile
	Management:	Internal BLM & FS estimates		Project Authorization
	All Lands:	Yes		Yes
	Fire Included:	No		No
	Who:	BLM NOC		BLM NOC or SOs or FOs
<b>ACRONYMS</b>				
PHMA = Priority Habitat Management Area      BSU = Biologically Significant Unit				
EVT = Existing Vegetation Type                      BpS = Areas of Biotic Potential				
<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.				
<sup>2</sup> Westwide data will be used only if state or local data are not available.				
<sup>3</sup> This footnote was removed from the table. January 2015.				
<sup>4</sup> This may be one of several variables used to inform Adaptive Management. The BSU is the scale at which Adaptive Management will be applied.				
<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data/analysis should be used for Adaptive Management				
<sup>6</sup> The project analysis area will be based on a 4-mile radius polygon around the project area combined with a 4-mile buffer around any lands within the project boundary in PHMA (Idaho methodology).				
<sup>7</sup> See Table 2				



## Attachment III

### **Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

#### **Guidance**

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment IV

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in

grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

**Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSR RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSR habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSR habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSR Habitat Objectives Table and Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

Attachment V

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*

Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

  - linear features (roads) within 3.1 miles of leks
  - infrastructure related to energy development within 3.1 miles of leks.
  - tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
  - low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
  - surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
  - noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis.

  - Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
  - If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
    - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater



level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).

- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Fwd: Governor's Letter; Final Sage Grouse Plan**

1 message

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Foss, Jeffery <jfoss@blm.gov> Tue, May 12, 2015 at 4:46 PM  
To: Amy Lueders <alueders@blm.gov>  
Cc: Steve Ellis <sellis@blm.gov>, Stephanie Carman <scarman@blm.gov>, Timothy Murphy <tmurphy@blm.gov>, Peter Ditton <pditton@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, Anne Briggs <anne.briggs@sol.doi.gov>, Brent Ralston <bralston@blm.gov>, Jon Raby <jraby@blm.gov>, Michael Tupper <mtupper@blm.gov>

FYI

Jeff Foss  
Acting State Director-Idaho BLM  
1387 S. Vinnell Way, Boise, ID 83709  
208-373-3800 or 373-4001  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

----- Forwarded message -----

From: Renee L. Miller <[RLMiller@idl.idaho.gov](mailto:RLMiller@idl.idaho.gov)>  
Date: Mon, May 11, 2015 at 2:13 PM  
Subject: Governor's Letter; Final Sage Grouse Plan  
To: [noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov), [michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov), [tmurphy@blm.gov](mailto:tmurphy@blm.gov), [jfoss@blm.gov](mailto:jfoss@blm.gov)

Good afternoon –

On behalf of Director Tom Schultz, Idaho Department of Lands, attached is a copy of Governor Otter's letter to Dan Ashe, Director, U.S. Fish and Wildlife Service which accompanied the final Greater-sage Grouse Conservation Plan approved by the Idaho State Board of Land Commissioners. That final plan is also attached here.

I apologize if you are receiving this information in duplicate.

Regards,

**Renée Miller**

Director's Assistant


Idaho Department of Lands


208.334.0242

[rlmiller@idl.idaho.gov](mailto:rlmiller@idl.idaho.gov)

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2 attachments

 2015-0501-ashe-sage-grouse-otter-executive-letter.pdf  
589K

 2015-0430-final-GRSG-CP.pdf  
3546K



C.L. "BUTCH" OTTER  
GOVERNOR

May 1, 2015

Dan Ashe, Director  
U.S. Fish and Wildlife Service  
U.S. Department of the Interior  
1849 C Street NW, Room 3331  
Washington, D.C. 20240-0001

Dear Dan,

The state of Idaho (State) reinforced its strategy to conserve greater sage-grouse (GRSG) and its habitat last month with the approval of additional conservation measures on State endowment trust lands and activities that fall under Idaho Department of Lands (IDL) regulatory and fire-related authorities.

The Idaho State Board of Land Commissioners (Land Board) approved the GRSG Conservation Plan (Land Board's Plan) on April 21, 2015. The Idaho Oil and Gas Conservation Commission (Commission) approved the Land Board's Plan on April 23, 2015. Included with this correspondence is a copy of the Land Board's Plan for your review.

The Land Board's Plan was developed with input from natural resource industry user groups, environmental organizations and relevant State and federal agencies. It is important to point out, however, that the implementation of the Land Board's Plan is contingent upon the incorporation of the foundational elements of the federal alternative (which is my plan) into the relevant Resource Management Plans (RMPs) in Idaho.

In addition to a landscape conservation approach for GRSG within the Land Board's Plan, the State of Idaho has backed up its commitment to GRSG conservation with a legislative appropriation of \$750,000 for additional conservation activities in Idaho. Some of this funding will be applied to projects on State endowment lands.

The State of Idaho has been proactive and collaborative in our efforts to conserve GRSG and its habitat in Idaho while maintaining working landscapes and the economic vitality of the State. These efforts demonstrate Idaho's commitment to the conservation of this iconic western species.

As always – Idaho, "Esto Perpetua"

A handwritten signature in black ink that reads "C.L. Butch Otter".

C.L. "Butch" Otter  
Governor of Idaho



**Idaho State Board of Land Commissioners  
Greater Sage-Grouse Conservation Plan**

April 21, 2015



*Credit KTVB*

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## Executive Summary

Sage-grouse is a candidate species being reviewed by the U.S. Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA).

As part of Idaho's commitment to conserving sage-grouse, the Idaho Department of Lands (IDL) developed conservation measures (CMs) for endowment trust land (endowment lands) management programs and for programs that fall under some IDL regulatory and assistance functions. The CMs for IDL programs that involve sage-grouse habitat are included in the Greater Sage-Grouse Conservation Plan outlined in this document, which the State Board of Land Commissioners (Land Board) and Idaho Oil and Gas Conservation Commission approved in April 2015 (Appendix F and G). The Greater Sage-Grouse Conservation Plan (Land Board's Plan) complements and augments the Governor's statewide plan to conserve the most important habitat for sage grouse in Idaho.

IDL collected comments on a draft sage-grouse plan. Input came from natural resource industry user groups, environmental organizations, and relevant state and federal agencies to fine-tune the plan.

Implementation of the Land Board's Plan is contingent upon the federal government's acceptance and incorporation of the Governor's plan in its final decisions on sage-grouse in Idaho.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits, and easements. For activities that take place on privately owned lands in sage-grouse habitat but involve some IDL regulatory and assistance functions, CMs are presented as voluntary best management practices.

Endowment lands are managed under a mandate in the Idaho Constitution (Article IX Section 8) to maximize long-term financial returns to public schools and other State of Idaho institutions. Approximately 1.4 million acres of the total 2.4 million acres of endowment land in Idaho are rangelands, and nearly half of these endowment rangelands are in Core and Important sage-grouse Habitat Zones identified by the Idaho Alternative, and as concurred by the USFWS.

The IDL also carries out a number of regulatory and assistance duties. The IDL regulatory and assistance responsibilities that affect sage-grouse habitat include regulating certain oil and gas development activities; dredge and placer mine permitting; mine reclamation plan approvals; and abandoned mine land reclamation. The IDL also supports enhanced fire preparedness and suppression in sage-grouse habitat.

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## 1. Brief History

In 2010, the USFWS determined Greater Sage-Grouse (sage-grouse) warranted protection under the ESA, but it was precluded from listing due to higher priority species. In the USFWS decision, the primary threats listed for Idaho were wildfire, invasive species, and infrastructure development.

The timeline for USFWS analysis was further accelerated when in 2011 a multidistrict litigation in the U.S. District Court of the District of Columbia resulted in a settlement agreement between the litigants and the USFWS. The settlement agreement required the USFWS to implement a six-year work plan to enable the agency to systematically review and address the needs of more than 250 species listed on the 2010 *Candidate Notice of Review* to determine if they should be added to the Federal Lists of Endangered and Threatened Wildlife and Plants. The USFWS agreed to determine the listing status of sage-grouse in 2015. Later in 2012, the U.S. District Court for the District of Idaho ruled that pursuant to the D.C. District Court settlement, the USFWS must reevaluate the status of sage-grouse under the ESA by September 30, 2015. In response to these deadlines, then-Secretary of the Interior Ken Salazar invited the 11 western states impacted by a potential listing of the species, including Idaho, to develop state-specific regulatory mechanisms to address the cited deficiencies in an effort to preclude a listing under the ESA.

As a direct outcome of the proposed ESA listing review, the U.S. Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

In March 2012, Governor C.L. "Butch" Otter issued Executive Order No. 2012-02 establishing the Governor's Sage-Grouse Task Force. The task force's goal was ultimately to develop state-specific regulatory mechanisms for the BLM to incorporate the state's plan as an alternative in the BLM environmental analysis pursuant to the National Environmental Policy Act (NEPA) EIS. The *Idaho Alternative* was submitted to the BLM in September 2012. The *Idaho Alternative* was incorporated as Alternative E in the November 2013 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Plan Amendment and EIS, where it was presented as a "co-preferred Alternative" along with the BLM Alternative D.

The Land Board's Plan complements the Governor's *Idaho Alternative* Sage-Grouse Plan for federal land management in Idaho.

The Land Board's Plan utilizes the *State of Idaho Habitat Zone* classifications defined in 2012 by the Governor's task force. Consistent with the *Idaho Alternative*, IDL focuses conservation efforts on the Core and Important Habitat Zones, which include the great majority of the sage-grouse populations in Idaho. There are more than 10,500,000 acres in Core and Important sage-grouse Habitat Zones in Idaho, with the vast majority of these acres under federal management (Table 1.1). IDL has surface or mineral ownership of almost 690,000 acres of Core and Important habitat, with about 619,000 acres of surface ownership in these habitat zones. While the IDL ownership is a relatively small proportion of the 10.5 million acres of habitat (less than 6 percent), almost half of endowment rangelands are found within the Core and Important Habitat Zones.

## 2. Purpose of the Plan

The Plan has a threefold purpose:

- (1) It summarizes CMs for endowment land programs and IDL regulatory and assistance programs that are complementary to the *Idaho Alternative* for sage-grouse conservation actions on federal land.
- (2) It communicates to the USFWS that, along with the *Idaho Alternative*, there are adequate existing regulatory mechanisms to alleviate the primary threats to sage-grouse and sage-grouse habitat in Idaho (such certainty will be necessary to prevent the sage-grouse from being listed under the ESA).
- (3) It preserves the statutory responsibility of IDL to manage endowment lands under a constitutional mandate to maximize long-term financial returns to state institutions, mainly public schools.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

IDL also will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

## 3. Coordination

Utilizing available funding, IDL will collaborate, coordinate, and utilize cooperative planning efforts to implement and monitor proposed CMs to protect and potentially improve sage-grouse habitat. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, lease/permit holders, and nongovernmental organizations.

Current sage-grouse coordination efforts in which IDL is involved include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015),*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project,*
- c. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015),*
- d. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014),*

- e. *Jarbidge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA),*
- f. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015), and*
- g. *Owyhee Land exchange (Agreement to Initiate signed December, 2008).*

In addition, IDL's FY 2016 budget includes a one-time appropriation of \$55,000 from the General Fund to cover IDL personnel costs within the Forest and Range Protection program for two heavy equipment mechanic positions to refurbish water tender equipment. This equipment will be utilized by the rangeland fire protection associations (RFPAs) in suppressing rangeland fire in the sage-grouse landscape. The FY 2016 budget also includes a one-time appropriation of \$195,000 in dedicated funds (Earnings Reserve Fund) for operating expenses within the Lands and Waterways program for fire prevention fuel breaks, conifer encroachment treatments, post-fire seeding, fire prevention brush management, wildlife fencing, flagging, and water development wildlife escape ramps.

#### **4. Greater Sage-Grouse Management Areas**

The Land Board's Plan utilizes the *State of Idaho Habitat Zone* classifications as described in the *Idaho Alternative, September 2012*, and as proposed by the Governor's Sage-Grouse Task Force. The *Idaho Alternative* designated a Sage-Grouse Management Area ("SGMA") with three distinct management zones: Core Habitat ("CHZ"), Important Habitat ("IHZ") and General Habitat ("GHZ"). At this time, IDL is not proposing any CMs for endowment lands or regulatory and assistance activities within the GHZ.

IDL concurs with and repeats the following statements from the *Idaho Alternative*:

*The State recognizes that any attempt to map sage-grouse habitat must, by necessity, be at a broad, programmatic scale. The mapping of boundaries presented above is not intended to equate to verified boundary locations or on-the-ground habitat types from which the public can determine with certainty whether any particular location is inside or outside of a particular management zone.*

*Rather, the mapping exercise is intended to give governmental entities, land managers, project proponents and the public a general idea of where certain types of habitat and conservation priorities are spatially located as of the date of the map. The State also recognizes that this mapping exercising depicting current habitat for the species is not static, and any map must be verified through site-specific environmental analysis.*

As described in the *Idaho Alternative*, additional lands beyond the identification thresholds have "been included in the CHZ to consolidate key breeding areas, to include wilderness areas and lands within national monuments, and to foster population connectivity with neighboring states." The IHZ similarly includes "areas of value for migration corridors, connectivity among breeding areas, and long-term persistence of each of the two key meta-populations of sage-grouse in Idaho." By default of the broad scale mapping exercise, both the CHZ and IHZ also include some areas that are neither sage-grouse habitat nor connectivity corridors.

The *Idaho Alternative* lists specific vegetation criteria to be considered for livestock grazing management on federal lands.

*Grazing within the CHZ and IHZ will be managed according to the process outlined in the text below. The first step, and perhaps the most important, is to inform and educate affected permittees regarding sage-grouse habitat needs and conservation measures. These habitat needs or*

*characteristics outlined in Tables 3-5 will be incorporated into relevant resource management plans as the desired conditions with the understanding that these desired conditions may not be achievable: (a) due to the existing ecological condition, ecological potential or the existing vegetation; or (b) due to casual events unrelated to existing livestock grazing.*

The IDL Range Management/Livestock Grazing measures do not include the vegetative criteria recommended for grazing on federal lands. The IDL livestock grazing component is from the previously vetted and approved 2006 Conservation Plan for the Greater Sage-grouse in Idaho ("2006 Idaho Plan"), and as detailed in Section 16 below.

The *Idaho Alternative* uses a *Core, Important, and General* habitat zone classification that is somewhat different from the BLM subregional alternative habitat classification of *Priority, Important, and General Habitat Management Areas* for Idaho. In addition to differences in habitat classifications there exist variations between on-the-ground habitat mapping in the *Idaho Alternative* and the BLM subregional Alternative. However, both Alternatives recognize the value of a three-tiered habitat approach which is essential to the functionality of the adaptive management process outlined in the *Idaho Alternative*. In 2014, the State of Idaho and the Idaho BLM came to final agreement of the sage-grouse habitat map for purposes of completion of the Final EIS for management actions on federal lands. The State and IDL both recognize the value of having a consistent classification across the sage-grouse landscape in Idaho, and IDL fully adopts the habitat map agreed upon by the State of Idaho and the Idaho BLM.

IDL will recognize any habitat management updates resulting from the five-year formal map review.

## **5. Adaptive Management**

### **5.a. Adaptive Management for Federal Lands**

The *Idaho Alternative* (September, 2012) Adaptive Management Triggers have been further refined and presented to the USFWS (Brian Kelly) in a letter from Governor Otter dated March 14, 2013. The trigger discussion has been copied from that letter, in part for reference:

*The adaptive triggers provide a regulatory backstop to prevent further loss and stabilize habitats and populations in the CHZ, and to a lesser extent in the IHZ, where a demonstrated significant loss has either occurred over time or unexpectedly (i.e., Murphy Complex Fire). These adaptive triggers are employed when dramatic shifts in population or habitat occurs based on an average over a three year period compared to 2011 values. Additionally, these adaptive triggers place the primary and secondary threats to the species in proper context to appropriately evaluate the cause(s) of the decline.*

*In addition to the below description, Idaho's Alternative utilizes two types of triggers to help determine whether changes in management are necessary. The triggers are broken down into a "soft" trigger and a "hard" trigger. The "soft" trigger becomes operative when one of the following occurs:*

- *10% decline in maximum number of males counted and a finite rate of change below 1.0 but not significantly on CHZ over a period of three years; or*
- *10% loss of nesting and wintering habitat in the CHZ of a Conservation Area over a period of three years.*

When the monitoring information indicates that the “soft trigger” may be tripped, an Implementation Team – aided by the technical expertise of IDF&G – will assess the factor(s) leading to the decline and identify potential management actions. See Idaho Alternative at 7. The Implementation Team<sup>1</sup> may consider possible changes in management to the CHZ. As to the IHZ, the Implementation Team may review the causes for decline and potential management changes only to the extent those factors significantly impair the state’s ability to meet the overall management objective. It is anticipated IDF&G will collect data annually and will make recommendations to the Implementation Team by August 31<sup>st</sup> for population triggers and January 15<sup>th</sup> for habitat triggers. (Per D. Kemner, IDFG, IDFG will collect population data and the BLM will collect habitat data)<sup>2</sup>.

The “hard” trigger becomes operative when one of the following occurs:

- 20% loss in CHZ nesting and/or<sup>2</sup> wintering habitat over a period of three years; or
- 20% decline in maximum number of males counted and a finite rate of change significantly below 1 within a CHZ of a<sup>2</sup> Conservation Area over a period of three years.

If the hard trigger becomes operative according to the monitoring information, management changes are no longer discretionary and will be implemented in the following manner:

First, the IHZ will be managed according to the CHZ provisions primarily impacting the ability to consider infrastructure projects. Like the “soft trigger,” the Implementation Team will analyze the actual cause(s) of the decline. The flow chart (Appendix II of letter is titled Adaptive Trigger Strategy- Determine What Caused a Hard Trigger to Become Operative and What Management Actions are Necessary) illustrates the process used to determine which threat(s) caused the habitat or population loss.

As the illustration denotes, the Service identified wildfire, invasive species, and infrastructure as the primary threats and West Nile Virus, improperly managed grazing, and recreation as secondary threats. This adaptive trigger strategy focuses the analysis on mitigating the primary threats to the

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<sup>1</sup> Excerpted from the clarification letter sent to Steve Ellis, Idaho State Director, BLM from Dustin Miller, Administrator, Governor’s Office of Species Conservation dated July 1, 2013:

*As part of the state’s responsibility under the MOU, Governor Otter would issue an Executive Order (under state law, an EO has the force and effect of law) establishing an Implementation Task Force to meet the state’s role and responsibilities under the MOU. This task force would be similar in composition to Governor Otter’s Sage-Grouse Task Force pursuant to Executive Order 2012-02.*

*The Implementation Task Force would be tasked with providing Governor Otter advice and counsel on at least the following issues: (1) analyzing the annual sage-grouse monitoring data to determine whether an adaptive response is appropriate and necessary given the population and habitat objectives provided in the Governor’s Alternative; (2) providing input during the National Environmental Policy Act (NEPA) process for on-the-ground infrastructure projects; and (3) prioritizing habitat restoration opportunities. The Implementation Task Force would submit these recommendations to the Governor, and based on his review and concurrence, will transmit these recommendation to the appropriate agency as part of the underlying NEPA analysis. The ultimate decision involving public land management would fall to the appropriate agency.*

*The Implementation Task Force will make recommendations based on the data and recommendations provided by a science subcommittee led by the Idaho Department of Fish and Game (IDFG). The Implementation Task Force may solicit outside experts if necessary.*

<sup>2</sup> Personal communication with Don Kemner, Idaho Fish and Game, April 11, 2015 correcting and clarifying items in letter that were refined for the DEIS.

species in the CHZ. Only where the monitoring information indicates the cause(s) of the decline is not a primary threat will the Implementation Team analyze the secondary threats to the species and determine whether further management actions are needed.

Population and habitat objectives are measured against baselines are illustrated in the tables below. The baseline for habitat within each CA is the 2011 nesting and wintering habitat for the CHZ and IHZ. (See Tables 1 and 2, *Idaho Alternative*, 2012.) The population baseline is the maximum number of males counted on lek routes in 2011 within the CHZ and the average finite rate of change of population for 2009-2011 within the CHZ. It is measured the same way in IHZ. CHZ and IHZ triggers are analyzed separately. The habitat triggers are also analyzed separately from the population triggers.

## **5.b. Adaptive Management for Endowment Lands**

While IDL recognizes that the soft and hard triggers would become operative across the landscape in a conservation area, regardless of land ownership, the appropriate response to address a soft or hard trigger tripping will only take place on federal land according to the *Idaho Alternative*. However, if the Implementation Team determines the causal factors are applicable to IDL managed land, IDL commits to implementing CMs tailored to meet the identified causal factor. These would likely be implemented immediately under an emergency action clause pending IDL Director approval. However, any CM to be implemented long-term that is a major deviation from the Land Board's Plan would need to be approved by the Land Board as an amendment to the Plan.

IDL will also utilize monitoring results to make any recommendations to the Land Board for their consideration as amendments to the Plan.

## **6. Anthropogenic Disturbance**

Impacts caused by anthropogenic disturbances on sage-grouse can vary depending on the type of activity and local habitat conditions. In addition, cumulative impacts of multiple activities can have significant, negative impacts on sage-grouse populations. In the *Administrative Draft Proposed Plan*, the BLM utilizes a 3 percent disturbance limit across all landowners within eight Biologically Significant Unit areas. Because endowment lands make up such a small percentage of Core and Important Habitat Zones, IDL will not place a disturbance limit within any defined areas on endowment lands since these limits would result in a violation of the fiduciary trust responsibilities bestowed on the Land Board and IDL in managing endowment lands in accordance with the Constitutional mandate.

## **7. Mitigation**

At this time, the State of Idaho has not finalized a mitigation plan, nor have there been funding sources identified or allocated to implement such a mitigation plan. Idaho's proposed mitigation plan is described in the "Framework for Mitigation of Impacts from Infrastructure Projects on Sage-Grouse and Their Habitats" (Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse Advisory Committee, December 2010).



IDL will commit to following Idaho’s mitigation plan once fully developed to the extent adequate funding exists.

## Plan Format

The Plan format uses two PARTS. PART I presents the CMs IDL will implement in its authorizing documents (e.g. leases) for third party activities on endowment lands. In addition, PART I identifies activities to be undertaken by IDL as the land manager related to fire prevention, wildfire suppression, and land transactions (e.g. land exchanges).

PART II presents the CMs IDL will recommend as voluntary best management practices for mining operators and oil and gas operators on non-state lands. In addition, PART II identifies activities to be undertaken by IDL under its statutory roles regarding fire prevention, wildfire suppression, and abandoned mine land reclamation.

Each Part then follows the numbered headings used in the BLM *Administrative Draft Proposed Plan* as an organizational outline and reader courtesy.

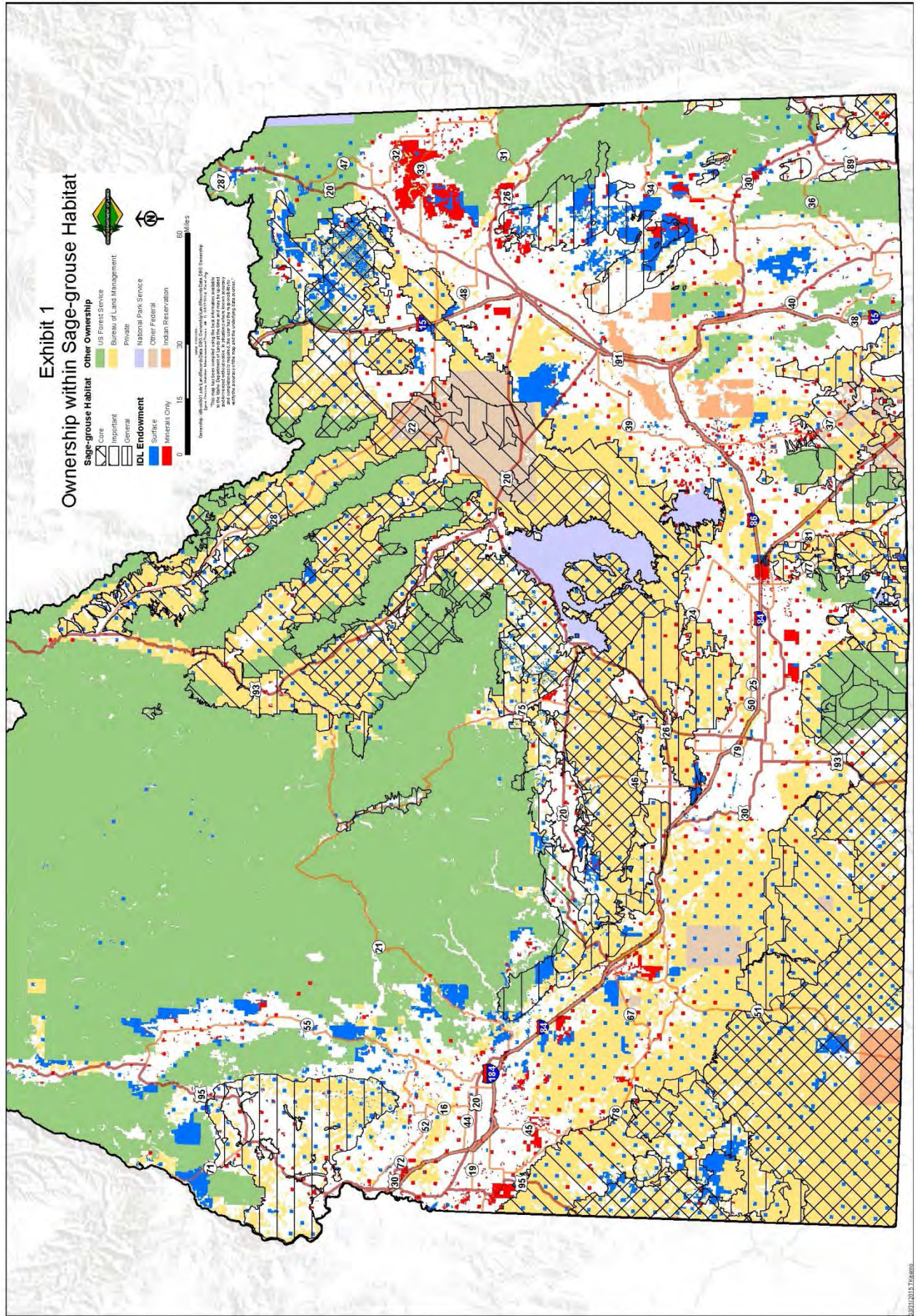
**TABLE 1.1 IDL Ownership within Sage-grouse Habitat by Conservation Area and Habitat Zones**

Conservation Area	Habitat Zone	Total Acres All Owners	Total IDL Ownership		IDL Surface Ownership		IDL Minerals Ownership Only	
		Acres	Acres	%	Acres	%	Acres	%
Idaho Desert	Core	1,017,180	31,702	3.12	29,853	2.93	1,849	0.18
	Important	1,064,653	43,510	4.09	38,710	3.64	4,800	0.45
	Total	2,081,833	75,212	3.61	68,563	3.29	6,649	0.32
Idaho Mountain Valleys	Core	2,110,685	177,006	8.39	164,286	7.78	12,720	0.60
	Important	1,602,894	135,004	8.42	120,881	7.54	14,124	0.88
	Total	3,713,578	312,010	8.40	285,166	7.68	26,844	0.72
Idaho Southern	Core	856,442	47,207	5.51	38,352	4.48	8,855	1.03
	Important	1,225,756	70,727	5.77	51,073	4.17	19,654	1.60
	Total	2,082,198	117,934	5.66	89,425	4.29	28,509	1.37
Idaho West Owyhee	Core	2,034,057	133,498	6.56	130,801	6.43	2,697	0.13
	Important	609,354	50,345	8.26	45,616	7.49	4,729	0.78
	Total	2,643,412	183,843	6.95	176,417	6.67	7,425	0.28
All Conservation Areas	CHZ and IHZ	10,521,022	688,999	6.55	619,571	5.89	69,428	0.66

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## **Exhibit 1**

### **Ownership by Sage-Grouse Habitat Zone**



## **PART I. CONSERVATION MEASURES FOR ACTIVITIES ON STATE ENDOWMENT TRUST LANDS**

For proposed activities by third parties on endowment lands in Core and Important Habitat Zones, IDL will implement CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements.

Also, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to conserve sage-grouse habitat. In addition, IDL will include an analysis of sage-grouse habitat impacts when considering land transactions that are located in Core or Important Habitat Zones.

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one size fits all” set of CMs. Science and technology also change over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by applicants or lessees must provide equal or better results than the CMs described below. Site-specific management plans will be reviewed and approved by the appropriate IDL staff. When anticipated results are uncertain, IDL will confer with the Idaho Department of Fish and Game (IDFG) prior to approving any site-specific management plan.

### **8. Fire Prevention on Endowment Land**

IDL is committed to conserving habitat for the sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire preparedness and prevention measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

In Idaho, there are 619,571 acres of endowment lands located within Core and Important Habitat Zones. These lands contain about 82,000 Animal Unit Months (AUMs) of leased forage. As a primary threat wildland fire has the potential to significantly impact endowment rangelands located in Core and Important Habitat Zones. Between 2009 and 2014, more than 19,000 acres of Core and Important sage-grouse habitat burned on endowment rangelands due to wildland fire. Based on historical averages, approximately 3,200 acres of endowment rangelands are expected to burn each year within Core and Important Habitat Zones with significant impacts to grazing lessees and endowment beneficiaries.

During the 2014 fire season, 2,957 acres of Core Habitat Zone burned on endowment rangelands making 470 AUMs of livestock forage unavailable for one to two years. In 2014, Core habitat restoration costs on 2,088 acres of those endowment lands totaled nearly \$45,000. Left unaddressed, the primary threat of wildland fire within Core and Important Habitat Zones on endowment rangelands is expected to continue at the same rate.

The following CMs will be incorporated as stipulations for any authorizing documents, (except livestock grazing which is addressed separately under item 16), issued within Core and Important sage-grouse habitat:

**8.1.** Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, RFPAs, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

**8.2.** Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.

**8.3.** Authorized parties will ensure that field personnel are aware of:

- a. fire prevention and emergency response plan,
- b. evacuation routes and procedures,
- c. designated safety meeting places, and
- d. emergency shutdown procedures.

**8.4.** Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

## **9. Wildfire Suppression on Endowment Land**

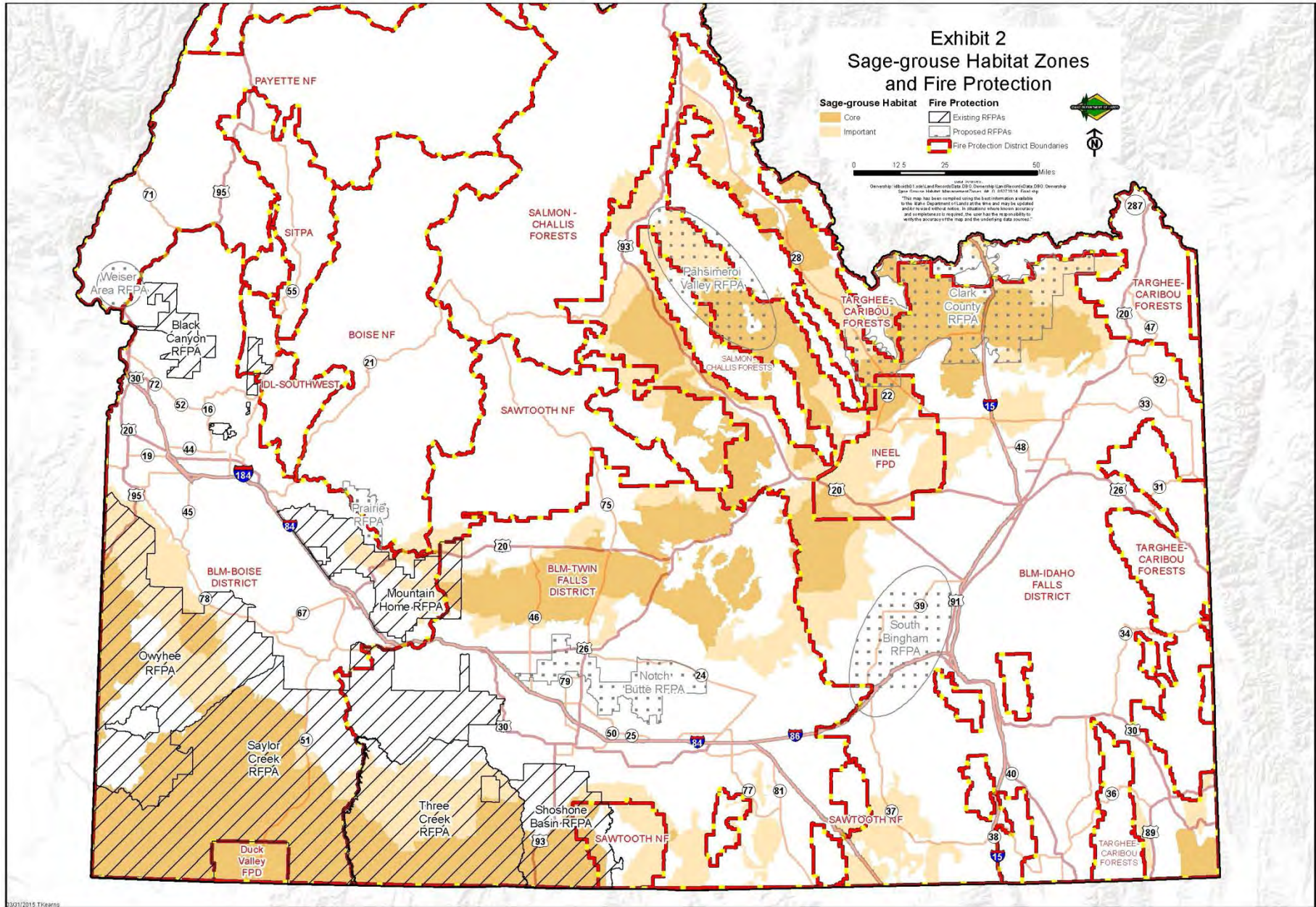
Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations). Exhibit 2 displays the IDL, federal, and active and proposed rangeland fire protection association boundaries within the sage-grouse landscape.

IDL is committed to conserving habitat for sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire suppression guidance that is complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important Habitat Zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

## Exhibit 2

### Sage-Grouse Habitat Zone and Fire Protection





When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasive Assessment Team (BLM/FS FIAT) plans. For extended attack fires involving endowment rangelands, in or near Core or Important Habitat Zones:

**9.1.** IDL may assign a Resource Advisor (primarily a Resource Specialist-Range) to provide local information regarding sage-grouse habitat during the in-brief and continually throughout the incident. The Resource Advisor will also be engaged with the incident to assess sage-grouse habitat that may be affected by the fire or suppression activities.

## **10. Fuels Management on Endowment Land**

Wildfires in a rangeland ecosystem can grow quickly and affect hundreds of thousands of acres of sage-grouse habitat in a matter of days or within a single burning period. Due to rapid fire spread, the potentially long response times due to remoteness, and limited sites for firefighters to establish safe anchor points to engage wildfires in some of these areas, these fires can be difficult to manage. Additionally, only one of the three legs of the fire triangle (fuel, oxygen, and heat) can be modified, which is fuel, making fuels management key in wildfire control in sage-grouse habitat.

**10.1.** Unless otherwise specified as part of a land use plan, IDL will consider the full array of fuels management treatment types (prescribed fire, mechanical, chemical, and biological) when implementing CMs and BMPs on endowment rangelands.

**10.2.** Where applicable IDL will design fuels treatment objectives on endowment rangelands to protect existing Core and Important Habitat Zones, modify fire behavior, restore native plants, and create landscape patterns to benefit sage-grouse habitat, as resources permit and consistent with the BLM/FS FIAT plans .

**10.3.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to use proper livestock management and targeted grazing as a treatment to reduce vegetative fire fuels, reduce annual grass densities, and to enhance and protect Core and Important Habitat Zones.

**10.4.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit. Examples of IDL cooperative efforts include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**10.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically implement brush management treatments and rehabilitate annual grasslands to reduce vegetative fire fuels within and to protect Core and Important Habitat Zones, as resources permit.

**10.6.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically establish green and brown strip fuel breaks along existing roads and other disturbances; identify and target higher-risk roads for fuel break construction and maintenance based on fire history maps; and use properly managed and targeted livestock grazing to create fuel break patterns that protect Core and Important Habitat Zones. Fuel breaks to include annual monitoring and maintenance. Examples of IDL cooperative efforts include:

- a. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015)*
- b. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014)*
- c. *Jarbidge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA)*

**10.7.** IDL will authorize private, state and federal contractor fuel break construction across IDL managed land.

**10.8.** IDL will prioritize fuel management treatments within Key Areas (large contiguous blocks of endowment land within Core and Important habitat that USFWS has identified as a priority for conservation efforts). Fuel management treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fuel management treatments within the Key Areas.

## **11. Wildfire Restoration and Rehabilitation on Endowment Land**

Wildfire restoration/rehabilitation is essential for conserving sage-grouse habitat. The increasing frequency and intensity of rangeland fire poses a significant threat to habitat as well as increasing opportunity for the accelerated invasion of non-native annual grasses, in particular cheatgrass and medusahead rye, and the spread of pinyon-juniper across the sagebrush-steppe ecosystem. By quickly taking action to restore/rehabilitate following wildfire, this opportunity is decreased as we increase the likelihood of desired vegetation reestablishing.

**11.1.** IDL will form partnerships, agreements, and cooperate with lessees, working groups, and other federal, state, county and private partners in post-fire restoration treatments of Core and Important Habitat Zones on state endowment trust rangelands damaged by fire. Restoration and rehabilitation efforts will be consistent with the BLM/FS FIAT plans.

- a. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015)*

**11.2** IDL will prioritize fire restoration/rehabilitation treatments within Key Areas. Fire restoration/rehabilitation treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from

Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fire restoration/rehabilitation treatments within the Key Areas.

## **12. Habitat Restoration and Vegetation Management on Endowment Land**

**12.1.** As resources permit, IDL will give high priority to vegetation restoration, rehabilitation or manipulation projects in Core and Important habitat within the Key Areas first, followed by those areas not within the Key Areas, consistent with the BLM/FS FIAT plans that include:

- a. Cooperative efforts that may improve Core and Important Habitat Zones over multiple ownerships.
- b. Projects that may provide connectivity between suitable habitats or expand existing good quality habitat within Core and Important Habitat Zones on endowment rangelands.
- c. Sites where environmental variables contribute to improved chances for project success.
- d. Projects that address conifer encroachment within Core and Important Habitat Zones. Priority for treatment as Phase 1 (<10 percent conifer cover), Phase 2 (10-30 percent), and Phase 3 (>30 percent).
- e. Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial, or other techniques to re-establish desired species.
- f. Re-establish sagebrush cover on recently burned native areas within suitable Core and Important Habitat Zones, with consideration to endowment rangeland forage productivity, local needs and conditions.

**12.2.** Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.

**12.3.** Use available plant species based on their adaptation to the site when developing seed mixes.

**12.4.** Use post-treatment control to reduce annual grass densities, invasive and noxious weed competition through targeted livestock grazing and herbicide applications.

**12.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit.

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**12.6** IDL will prioritize habitat restoration treatments within Key Areas. Habitat restoration treatments within Key Areas will incorporate sage-grouse seasonal habitat

guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any habitat restoration treatments within the Key Areas.

### **13. Invasive Plant Species on Endowment Land**

Exotic annual grasses and other invasive plants alter habitat suitability for sage-grouse by reducing or eliminating native forbs and grasses essential for food and cover. Exotic annual grasses, in particular cheatgrass and medusahead rye, also facilitate an increase in mean fire frequency. For endowment lands, the following CMs for invasive plant species will be applied through lease stipulations or other recordable instrument stipulations.

**13.1.** Vehicles and equipment operated by IDL or lessees that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.

**13.2.** Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by the lessee and the lessor or a designated agent.

**13.3.** Reclamation activities will include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) will be certified weed free by the appropriate federal or State of Idaho agency.

**13.4.** Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

### **14. Infrastructure Development / Lands and Realty on Endowment Land**

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.)*

*Infrastructure related to small-scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Infrastructure development on endowment lands can vary from minor road or fencing construction to utility-scale renewable energy facilities including wind farms, geothermal power plants, and

solar power plants. These developments regardless of their size can have a measurable and substantial impact on sage-grouse and their habitat. All infrastructure developments require some form of road construction to deliver materials for construction and perform regular maintenance to facilities. These roads are often graded gravel roads and are maintained periodically for easy access to sites. Other smaller roads are developed for access to geothermal well pads, wind turbines, or pipelines. Roads may also be necessary for third-party access to private or federal lands.

Transmission lines must be built in order to harness power from wind turbines, geothermal sites, or solar sites and to provide for grid reliability. Additionally, fences are often erected to protect facilities such as turbines or substations from vandalism. These features all have the potential to directly, or indirectly, affect sage-grouse at multiple scales and over time.

The potential for renewable energy development to occur on endowment lands located in Core and Important Habitat Zones is very low. However, any proposed development will be required to comply with the CMs identified in the following sections. These same CMs will also be included as stipulations in rights-of-way, when IDL authorizes parties to access other lands by using endowment lands.

#### **14.1. Surface Use and Timing**

**14.1.1.** Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by the IDFG recommends otherwise.

**14.1.2.** No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones. Livestock grazing is not considered surface occupancy.

**14.1.3.** During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.

**14.1.4.** Major construction and maintenance activity shall be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **14.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **14.3. Fencing**

Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.

**14.3.1.** New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011).

Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

**14.3.2.** As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

### **14.4. Water Supply Structures**

**14.4.1.** New or modified spring developments (including pipelines) shall be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.

**14.4.2.** As an exception to 14.4.4.1., on projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the lessee to treat these tanks for mosquito species that carry West Nile Virus.

**14.4.3** The construction of new ponds or reservoirs by authorized parties will be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse.

**14.4.4.** Wildlife escape ramps in new and existing water troughs and open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

### **14.5. Constructed Improvements**

**14.5.1.** Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

**14.5.2.** Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations

**14.5.3.** Surface disturbances will be clustered in order to limit surface occupancy.

**14.5.4.** New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.

**14.5.5.** Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.

**14.5.6.** New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.

**14.5.7.** Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**14.6. Site Reclamation** (non-fire related rehabilitation/reclamation)

**14.6.1.** Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.

**14.6.2.** Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.

**14.6.3.** Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## Transition Lands/Land Tenure

IDL considers opportunities to sell, purchase, develop, or exchange endowment lands to meet its constitutional mandate to maximize long term returns to the owning beneficiaries by diversifying land holdings, maximizing the rate of return to the trusts, improving public access to endowment lands, and consolidating endowment lands for more efficient management. In order to accomplish these objectives, IDL must be able to maintain the flexibility to move lands into and out of the identified habitat zones. Lands identified for potential ownership changes are termed “transition lands.”

The ultimate decision authority for determining to auction or exchange endowment lands lies with the Land Board. IDL commits to providing the Land Board relevant data and analysis to inform them on potential impacts to sage-grouse habitat of land transitions within Core or Important sage-grouse Habitat Zones through the following CMs.

**14.7.** Any tract proposed for sale or exchange within Core or Important Habitat Zones will include an analysis on the impact to sage-grouse habitat resulting from the transition. This analysis will include, but not limited to:

- Acres in and percentages of Core and Important Habitat Zones.
- Quality/type of habitat (number of leks, breeding, nesting, early brood rearing, summer/late brood rearing, fall, winter).
- Any knowledge of new owner’s implementation/commitment for sage-grouse conservation measures to estimate overall impact to sage-grouse habitat conservation.
- IDFG data and review comments.

## 14.8 BLM Land Exchanges

IDL adopts a general strategy aimed at reducing endowment ownership of Key Habitat within Core Habitat Zones through completion of land exchanges with the BLM. This strategy would provide the greatest levels of certainty for conservation of core sage-grouse habitat.

Once endowment lands have been proposed to be included in a formal land exchange with the submission and acceptance of an Agreement to Initiate (ATI) with the BLM, the IDL, with Land Board concurrence, would commit to up to a three-year deferral on leasing of those lands for mineral development in order to accomplish the exchange.

Key habitat areas within Core Habitat Zones within the endowment trust estate would be prioritized for exchange. In exchange for those endowment lands, IDL would prioritize BLM lands and/or minerals with the following characteristics for acquisition consistent with its duty to maximize revenue over the long term in accordance with Article IX, Section 8 of the Idaho Constitution: 1) lands and minerals located outside of Core and Important Habitat Zones, 2) lands with oil and gas resource development potential, 3) lands with non-native vegetation (previously seeded crested wheatgrass), and 4) lands that block up existing IDL ownership, not necessarily limited to the current disposal lists in the respective Resource Management Plans.



Given the long timeframes that can be associated with federal land exchanges, IDL proposes that the Department of Interior consider adopting a streamlined exchange process, similar to authorities contained in the 2014 Farm Bill for the U.S. Department of Agriculture. Land exchanges that provide a net benefit to conservation of core sage grouse habitat, should be considered for a categorical exclusion under the National Environmental Policy Act (NEPA).

#### **14.9. Owyhee Land Exchange**

In December, 2008 the BLM and IDL entered into an Agreement to Initiate Land Exchange. IDL's objectives for parcel acquisition selection include: improved range (crested wheatgrass seedings), parcels outside Core or Important sage-grouse habitat or bighorn sheep habitat, parcels that block up current IDL ownership and/or provide legal access to existing ownership, and parcels that may have Higher and Better Use (HBU) potential. Objectives for disposition of IDL lands include: wholly within or adjacent to designated wilderness, scattered parcels with no legal access and no management control, other scattered IDL parcels within large blocks of BLM ownership. Acreage in the current version of the exchange includes approximately 28,000 acres of IDL ownership and 32,000 acres of BLM ownership. Parcels in the exchange are displayed in Appendix D.

**14.10** New acquisitions of endowment lands within the Core and Important Habitat Zones would be discouraged; however, if minor amounts of lands were acquired, they would be managed according to the IDL sage-grouse CMs.

### **15. Mineral Leasing on Endowment Land**

For all mineral leasing activities on endowment lands, CMs for the sage-grouse will be applied through lease stipulations or other recordable instrument stipulations that are enforceable. Mineral leasing can be slightly more complex due to the potential for split estate scenarios, where the surface owner is different than the mineral estate owner. In these cases, IDL would still include CMs as lease stipulations when leasing involves only the mineral estate (where the endowed beneficiary is not the surface owner).

#### **15.1. Fluid Mineral Leasing on Endowment Land**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse Habitat Zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-

specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist. For endowment lands, the following oil and gas lease stipulations will be included in the lease document and advertised prior to lease auction on tracts within Core and Important Habitat Zones.

#### **15.1.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **15.1.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

#### **15.1.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

#### **15.1.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **15.1.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances will be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **15.1.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **15.2. Mining Activities on Endowment Lands**

Mineral leasing and any subsequent mining activities on state endowment trust lands require authorization and oversight by IDL. IDL uses written procedures, including mineral lease pre-auction inspections, quarterly or yearly mineral lease inspections, and mineral lease enforcement to ensure compliance by authorized parties. The following conservation measures will be incorporated into the IDL mineral leases that are in Core and Important sage-grouse Habitat Zones.

### **15.2.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations, project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **15.2.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before sunset to 2 hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **15.2.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

#### **15.2.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **15.2.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances may be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within 1km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within 3 km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **15.2.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **16. Range Management/Livestock Grazing on Endowment Land**

IDL recognizes that healthy rangelands provide a basic foundation for productive sage-grouse habitat. Conservation and improvement of sage-grouse habitat is consistent with long-term

grazing management systems that support conditions or trends toward healthy rangelands. Within the 2006 Conservation Plan for the Greater Sage-Grouse in Idaho (“2006 Idaho Plan”), IDL agreed to take measures that protect or improve important and critical wildlife habitat, subject to the fundamental mission of IDL to support endowment beneficiaries. Though the impact of livestock grazing to rangelands is recognized as a secondary threat to sage-grouse habitat in Idaho, roughly 619,571 surface acres or 44 percent of endowment rangelands are within Core and Important Habitat Zones. IDL identifies proper livestock grazing as a tool that could benefit sage-grouse habitats by taking into consideration flexibility and site-specific management opportunities.

Identified within the 2006 Idaho Plan, livestock management practices are not stand-alone actions. Management activities should be considered in combinations best characterized by a complete and effective grazing program and that also considers key sage-grouse conservation needs. IDL further recognizes that opportunities exist for state and federal agencies, grazing lessees and university researchers to collaborate on efforts to modify current conditions and needed management actions in terms of livestock grazing in sage-grouse habitats throughout southern Idaho. IDL will administer endowment rangelands and livestock grazing leases in Core and Important Habitat Zones with lease stipulations that are drawn from, in part, the CMs specified within the 2006 Idaho Plan as well as more recent IDFG recommendations.

Issue Addressed	Conservation Measure(s)
Livestock management and leks.	<ol style="list-style-type: none"> <li>1. Use lek route or other relevant information to identify leks where the placement of sheep camps, bed grounds, herding or related activities is repeatedly disturbing displaying birds on active leks. Dates of concern are from March 15 through May 1 in lower elevation with habitats and March 25 through May 15 in higher elevation habitats. Once such leks are identified, IDL will work closely with sheep ranchers, Local Working Groups and/or IDFG to identify mutually agreed upon alternative sites or herding routes that eliminate or reduce disturbance. In selecting such alternative sites/routes, focus on areas away from leks and that do not provide breeding habitat characteristics, where feasible. If such lek-specific CMs cannot be developed (due to time or logistical constraints), domestic sheep grazing activities described above will be avoided within the lesser of 1 km (0.62 mi) or direct line of sight of any such lek during the lekking periods.</li> <li>2. IDL will provide maps to lessees to ensure that sheep operators and herders are aware of the location of possible or occupied leks.</li> </ol>
Livestock management and late brood rearing habitat.	<ol style="list-style-type: none"> <li>1. Due to the preference of forbs by domestic sheep, manage sheep allotments using grazing management techniques that promote and maintain a diversity of desirable annual and perennial forbs. Suggestions include:               <ol style="list-style-type: none"> <li>A. Alternate or rotate areas for spring turnout.</li> <li>B. Promote light, once-over use of vegetation, as opposed to repeated use during the same season</li> </ol> </li> </ol>

Issue Addressed	Conservation Measure(s)
	<p>by the same band or successive bands of sheep.</p> <p>C. Ensure that permittees, foremen, herders and sheep camp tenders are informed of management and movement requirements, such as related to the avoidance of recent burns, burned area rehabilitation seedings or other restoration sites.</p> <p>D. Employ open (loose) herding of sheep as opposed to tightly bunched sheep.</p> <p>2. Manage grazing of riparian areas, meadows, springs, and seeps in a manner that promotes vegetation structure and composition appropriate to the site. In some cases enclosure fencing may be a viable option. However, in some cases, (e.g., enclosed meadows) the availability and quality of herbaceous species may be improved by periodic grazing use of enclosure and should be considered in the grazing management program.</p> <p>3. In agricultural fields where sage-grouse use has been documented or is likely, willing lessees may wish to avoid or limit use of alfalfa by livestock after the last cutting, to provide residual alfalfa for use by sage-grouse broods.</p>
Livestock management during periods of drought.	<p>1. In sage-grouse nesting and brood-rearing habitats, adjust livestock use (season, utilization, stocking, intensity, and/or duration) during drought to minimize the additional stress placed on herbaceous species. This is anticipated to reduce impacts on perennial herbaceous cover, plant species diversity and plant vigor. IDL will cooperate with lessees and federal partners as needed.</p> <p>2. IDL will continue to foster the coordination of drought management activities and outreach through the Idaho Rangeland Drought Task Force committee.</p>
Placement of salt and mineral supplements.	<p>1. When using salt or mineral supplements: a) place them in existing disturbed sites, areas with reduced sagebrush cover, seedings, or cheatgrass sites (for example) to reduce impacts to sage-grouse breeding habitat, b) where feasible, use salts or mineral supplements to improve management of livestock for the benefit of sage-grouse habitat.</p>
Placement of fences and other structures.	<p>1. Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.</p> <p>2. New and existing wire fence segments constructed by</p>

Issue Addressed	Conservation Measure(s)
	<p>authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.</p> <p>3. Where feasible, IDL will recommend placement of new fences and structures with consideration of their impact on sage-grouse. In general, avoid constructing new fences within 1 km (0.62 mi) of occupied leks (adopted from Connelly et al. 2000b). Where feasible, place new, taller structures such as corrals, loading facilities, water storage tanks, windmills etc., as far as possible from occupied leks to reduce opportunities for perching raptors. Careful consideration, based on local conditions, will also be given to the placement of new fences or structures near other important seasonal habitats (winter-use areas, movement corridors etc.). In order to reduce potential impacts, fence markers will be used to mitigate mortality within areas identified by IDL, lessees or cooperative partners.</p>
Design and placement of water developments.	<p>1. IDL and lessees will cooperate on site-specific new spring developments in sage-grouse habitat. Spring developments will be designed to maintain or enhance the free-flowing characteristics of springs and wet meadows by the use of float valves on troughs or other features where feasible. Retrofit existing water developments during normal maintenance activities to maintain or enhance lentic, riparian properties and minimize annual maintenance.</p> <p>2. IDL and lessees will cooperate to ensure that new and existing livestock troughs and open water storage tanks are fitted with wildlife escape ramps/ladders to facilitate the use of and escape from troughs by sage-grouse and other wildlife. Floating boards or similar objects will not be used as these are too unstable and are ineffective. IDL and lessees will cooperate to ensure that USDA-NRCS design requirements for wildlife escape ramps are followed when installed.</p>

## 17. Wild Horses and Burros

No direct measures, this item included to maintain sequential numbering system utilized for the BLM *Administrative Draft Proposed Plan*.

## 18. Travel Management



**18.1.** On site traffic should be reduced by use of telemetry and other remote sensing tools.

**18.2.** During operations, existing roads or trails should be employed and activities should be contained as close to existing roads and trails as feasible.

**18.3.** Roads should be designed by authorized parties to an appropriate minimum standard necessary to accommodate their intended purpose.

**18.4.** Road crossings should be constructed by authorized parties at right angles to ephemeral drainages and stream crossings.

## **19. Recreation**

Recreation has been determined to not be a primary threat to sage-grouse in Idaho, but the measures listed above in Sections 13 and 14 will also apply to recreation leases.

## **20. Implementation and Monitoring**

Implementation of the CMs through lease/permit/easement stipulation will be incorporated into existing lease/permit/easement issuance procedures. A copy of the applicable CMs will be provided to all interested applicants for a lease, permit or easement on endowment lands located in Core or Important Habitat Zones, so the applicant is informed of the expected requirements when entering the application process. The CMs will be incorporated into the authorizing document either directly or by separate addendum. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs required through lease/permit/easement stipulation will be incorporated into existing lease/permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for land transactions will be amended to include an analysis of the impacts on sage-grouse when the transaction includes transition lands within Core or Important Habitat Zones. The results of this analysis will be included in the information provided to the Land Board for their review of the proposed transaction.

## **PART II. CONSERVATION MEASURES FOR IDL ACTIVITIES IN THE FIRE PROGRAM AND FOR REGULATED ACTIVITIES IN THE OIL & GAS AND MINERALS PROGRAMS**

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

In addition, IDL has roles and responsibilities in its fire program where CMs will be implemented to address conservation of sage-grouse habitat in Core and Important Habitat Zones.

### **8. Wildfire Preparedness/Prevention**

IDL is committed to conserving habitat for the greater sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed the following wildfire preparedness and prevention conservation measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

**8.1.** IDL will continue to support the ongoing operations of taxing and non-taxing fire districts in Idaho, when requested and as available, through equipment acquired through the Federal Excess Personal Property (FEPP) program and Firefighter Property (FFP) program, and through Volunteer Fire Assistance (VFA) grant fund allocations.

**8.2.** IDL will continue to support the formation and ongoing operations of RFPAs through the IDL South Idaho Fire Program Liaison. This position is the point of contact for any needs or issues raised by RFPAs and their cooperators. The position coordinates information needs on an annual cycle as well as facilitating an annual meeting for all RFPA Board of Directors and their cooperators, held following fire season.

**8.3.** IDL will continue to support, as funding is available, the formation and operation of RFPAs through start-up funding that provides personal protective equipment, radios, firefighting equipment, and training materials.

**8.4.** IDL will continue to utilize burning permits (per Idaho Code 38-115, Rule IDAPA 20.04.01.060) during the designated closed fire season as a fire prevention and control tool. Burning permits acquaint the permit holder with the laws and requirements for safe burning. During times of critical fire hazard, all burning may be stopped by the suspension of burning permits. Closed fire season provides for public safety and the protection of land resources by ensuring that all burning operations which may occur during periods of high

fire danger are conducted under safe conditions and in such manner that the danger of uncontrolled fire spread is minimized.

**8.5.** IDL will continue to participate in the Idaho Fire Restrictions Plan (per Idaho Code 38-115, Rule IDAPA 20.04.01.060; IDAPA 20.04.01.070; IDAPA 20.04.01.090; and IDAPA 20.04.01.120), which is an interagency document that outlines coordination efforts regarding fire restrictions and closures. The purpose of fire restrictions is to reduce the risk of human-caused fires during unusually high fire danger and/or burning conditions. An interagency approach for initiating restrictions or closures helps provide consistency among the land management partners, while defining the restriction boundaries so they are easily distinguishable to the public.

## **9. Wildfire Suppression**

Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations).

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important Habitat Zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasive Assessment Team (BLM/FS FIAT) plans.

## **10. Fuels Management**

IDL does not have general regulatory authority over fuels management on non-state rangelands.

## **11. Wildfire Restoration and Rehabilitation**

IDL does not have general regulatory authority over wildfire restoration and rehabilitation on non-state rangelands.

## **12. Habitat Restoration and Vegetation Management**

IDL has limited authority to regulate habitat restoration and vegetation management, but will address vegetation management through voluntary BMPs and permit stipulations. See section 15.

### **13. Invasive Plant Species**

IDL has limited authority to regulate invasive species, but will address invasive species management through voluntary BMPs and permit stipulations. See Section 15.

### **14. Infrastructure Development**

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.)*

*Infrastructure related to small-scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one size fits all” set of CMs. Science and technology also change over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by authorized parties should provide equal or better results than the CMs described below. Site specific management plans will be reviewed by appropriate IDL staff and the IDFG prior to a final recommendation from IDL.

IDL has limited authority to regulate infrastructure development, but will address infrastructure development through voluntary BMPs and permit stipulations. See Section 15.

### **15. Minerals**

#### **15.1. Fluid Minerals**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse Habitat Zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods

and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist.

### **15.1.2. Oil and Gas Activities – Regulatory Compliance**

The IDL is the administrative arm of the Idaho Oil and Gas Conservation Commission (Commission) pursuant to § 47-319(2) which states that the commission is authorized to; "...regulate the exploration for and production of oil and gas, prevent waste of oil and gas and to protect correlative rights, and otherwise to administer and enforce this act. It has jurisdiction over all persons and property necessary for such purposes. In the event of a conflict, the duty to prevent waste is paramount." Under this authority, § 47-321 provides for the commission to establish spacing units which are legally described boundaries overlaying the resource and set a fixed acreage per well, with the well located in the center of the boundary. § 47-321(b) states that these spacing units are established by the Commission in order to; "...result in the efficient and economical development of the pool as a whole..."

At this time for conventional drilling techniques, the default spacing, set by the Commission, is 640 acres for gas and 40 acres for oil. As surface use restrictions grow, the Commission could see requests to modify the default spacing unit in order to limit surface disturbance. As the Commission receives these requests, IDL will provide sage-grouse habitat data so that the Commission, if it chooses, can incorporate such information into its decision establishing a new spacing unit.

The BMPs listed below will be provided to all applicants seeking permit issuance for operations in Core or Important sage-grouse Habitat Zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a stipulation in the permit.

#### **15.1.2.1. Oil and Gas Activities**

The following BMPs will be provided to all operators making application to drill a well, treat a well, or conduct seismic explorations in Core or Important Habitat Zones.

##### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized during operations will be cleaned before entry to prevent the spread of seeds and propagules. The equipment will also be cleaned at the conclusion of all field activities.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

#### **c. Surface Use and Timing**

- i. Conventional well activity and exploration will not be conducted within 0.62 miles of an occupied lek.

- ii. All pipelines and collector lines will be emplaced utilizing horizontal boring methods with a minimum setback of 0.62 miles of an occupied lek.
- iii. Construction of pipelines will be in accordance with seasonal stipulations regarding no operations or construction from March to July.
- iv. Planned pipeline maintenance will not be conducted between 6 p.m. to 8 a.m., except in an emergency situation, within 0.62 miles of an occupied lek during the breeding season.
- v. Compressor stations and other vital operations shall be placed a minimum of 0.62 miles from an occupied lek, unless screening or other mitigation is determined to be as protective.

**d. Noise**

- i. Noise from permitted well sites will not exceed a 65db daily average threshold during the lekking season, within 0.62 miles of an occupied lek.
- ii. Noise levels may be exceeded for emergency situations including well control, threats to freshwater resources, and other environmental safety concerns.

**e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

**f. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**g. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.



## 15.2. Abandoned Mine Lands Program

The Abandoned Mine Lands Program operates on private, federal, and state lands. IDL works with landowners to address safety closures of dangerous mine openings and reclaim areas to protect human health. Reclamation is also performed to improve water quality and wildlife habitat, but public safety projects take precedence. IDL develops and controls these projects, and can incorporate sage-grouse CMs into the projects. Abandoned mine land projects will implement the following BMPs within Core and Important sage-grouse Habitat Zones.

### a. Wildfire Prevention

- i. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- ii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iii. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

### b. Invasive Species

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.
- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are

determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **d. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes

and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.

- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **15.3. Mining Regulatory Program**

The Mining Regulatory program operates on private, federal, and state lands and covers all dredge and placer mining and surface mining operations. Activities classified as exploration, such as drilling or trenching, only require a notification to IDL. Dredge and placer mining operations over ½ acres require a permit and bond. Surface mining operations that produce materials for immediate or ultimate sale require a reclamation plan and bond. Coordinated reviews with Idaho Department of Environmental Quality, Idaho Department of Water Resources, and IDFG are required for operations that may impact water quality.

The BMPs listed below will be provided to all applicants seeking reclamation plan approval or permit issuance for mining operations in Core or Important sage-grouse Habitat Zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a condition of reclamation plan or permit approval.

To further contribute to conservation of sage-grouse habitat, IDL will also coordinate with IDFG to evaluate existing mines and their potential impact on sage-grouse habitat. The following best management practices will be suggested to these mine operators. IDL will also work with IDFG to develop an informational brochure for new mine operators so they may consider adopting these BMPs into their proposed operations.

#### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.
- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved/designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.

- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

**c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

**d. Noise**

- i. Limit noise levels from discretionary activities within Core and Important Habitat Zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.
- ii. Authorized party will keep noise levels on existing infrastructure within the 0.62 mile buffer to 65 decibels or less.

#### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks should be allowed to conserve water resources and efforts should be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be installed and maintained to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed

for access to facilities. Requirements from public utilities will be followed for all installations.

- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- vi. New structures with a height over five feet should not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.



## **16. Range Management/Livestock Grazing**

IDL does not have general regulatory authority over livestock grazing on non-state lands.

## **17. Wild Horses and Burros**

IDL does not have regulatory authority over wild horses and burros.

## **18. Travel Management**

IDL does not have general regulatory authority over travel management on non-state lands.

## **19. Recreation**

IDL does not have general regulatory authority over recreation on non-state lands.

## **20. Implementation and Monitoring**

Implementation of the CMs through voluntary agreement will be incorporated into existing permit procedures. A copy of the applicable CMs will be provided to all applicants for a permit on lands located in Core or Important Habitat Zones. As part of the application, applicants will acknowledge which, if any, CMs they are willing to voluntarily comply with. Those CMs will then be incorporated into the permit as an enforceable stipulation of the permit. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs stipulated in the permit will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for Abandoned Mine Lands projects will be amended to include an assessment of the impact on sage-grouse when the project includes lands within Core or Important Habitat Zones. The results of this assessment will be used to determine the appropriate CMs to be implemented as part of the project.

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## Appendix A

### Glossary

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## Habitat Classifications

**Core Sage-Grouse Habitat:** State of Idaho delineation of strongholds for sage-grouse populations in Idaho. This habitat is the highest priority for conservation efforts and for policies to address primary threats. It includes approximately 65 percent of known active leks and occupied by approximately 73 percent of male sage-grouse counted at leks throughout the Idaho sage-grouse management area.

**General Sage-Grouse habitat:** Occupied (seasonal or year-round) habitat outside of priority habitat. It includes a few active leks and fragmented or marginal habitat, such as two isolated populations of sage-grouse in the East Idaho Uplands and West Central Idaho. These areas have been identified by the BLM in coordination with respective state wildlife agencies.

**Important Sage-Grouse Habitat:** State of Idaho delineation defined as the 75 percent breeding bird density areas. This habitat includes areas of value for migration corridors, connectivity among breeding areas, and long term persistence of each of the two key metapopulations of sage-grouse in Idaho. It includes approximately 25 percent of the known active leks. This habitat is occupied by an estimated 22 percent of sage-grouse males. Captures high quality habitat and populations necessary for providing a management buffer for the core habitat.

**Key Habitat:** State of Idaho delineation of areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year including winter, spring, summer, late brood-rearing, fall, transition sites from winter to spring, spring to summer, and summer/fall to winter. Key habitat may or may not provide adequate nesting, early brood-rearing, and winter cover due to elevation, snow depth, lack of early season forbs, limited herbaceous cover, or small sagebrush patch size.

**Priority Sage-Grouse habitat:** Areas that have been identified as having the highest conservation value to maintaining sustainable sage-grouse populations. These areas would include breeding, late brood-rearing, and winter concentration areas. The BLM has identified these areas in coordination with respective state wildlife agencies.

## Lek Classification

**Lek:** A traditional courtship display area attended by male sage-grouse in or next to sagebrush-dominated habitat. A lek is designated based on observations of two or more male sage-grouse engaged in courtship displays. Subdominant males may display on itinerant courtship display areas during population peaks. Such areas usually fail to become established leks. Therefore, a site where less than five males are observed strutting should be confirmed active for two years before meeting the definition of a lek (Connelly et al. 2000; Connelly et al. 2003, 2004). Each state may have a slightly different definition of lek, active lek, inactive lek, occupied lek, and unoccupied leks. Regional planning will use the appropriate definition provided by the state of interest.

**Lek buffer:** Buffers are calculated from the center (IDFG GPS coordinate) of the lek. Exact lek edges are difficult to define because leks shift and birds move on any given day.

**Lek complex:** A lek or group of leks within 2.5 kilometers (1.5 miles) of each other between which male sage-grouse may interchange from one day to the next. Fidelity to

leks has been well documented. Visits to multiple leks are most common among yearlings and less frequent for adult males, suggesting an age-related period of establishment (Connelly et al. 2004).

**Lek, abandoned:** A lek in otherwise suitable habitat that has not been active for 10 consecutive years. To be designated abandoned, a lek must be inactive (see above criteria) in at least four nonconsecutive courtship display seasons spanning the 10 years. The site of an abandoned lek should be surveyed at least once every 10 years to determine whether it has been reoccupied by sage-grouse.

**Lek, active:** Any lek that has been attended by male sage-grouse during the courtship display season.

**Lek, destroyed:** A formerly active lek site and surrounding sagebrush habitat that has been destroyed and is no longer suitable for sage-grouse breeding.

**Lek, inactive:** Any lek where sufficient data suggests that there was no courtship display activity throughout a lekking season. Absence of strutting grouse during a single visit is insufficient documentation to establish that a lek is inactive. This designation requires documentation of one of the following scenarios:

- An absence of sage-grouse on the lek during at least two ground surveys separated by at least seven days. These surveys must be conducted under ideal conditions (April 1-May 7 or other appropriate date based on local conditions), no precipitation, light or no wind, half-hour before sunrise to one hour after sunrise).
- A ground check of the exact known lek site late in the courtship display season (after April 15) that fails to find any sign (tracks, droppings, feathers) of strutting activity. Data collected by aerial surveys should not be used to designate inactive status as the aerial survey may actually disrupt activities.

**Lek, occupied:** A lek that has been active during at least one strutting season within the prior 10 years. This is the status IDFG recommends for long term decision making.

**Lek, undetermined:** A lek that has not been surveyed to determine status.

**Lek, unoccupied:** A lek that has either been destroyed or abandoned.

## **Habitat Use and Periods**

**Breeding period:** Includes lekking, nesting and early brood-rearing periods, generally March 1 through June 30 (Connelly et al. 2000b).

- *Early brood rearing habitat:* Generally upland sagebrush habitats relatively close to sage-grouse nest sites. These areas are important to broods during the first few weeks after hatching. Forb and insect abundance and diversity are important factors. (See Connelly et al. 2000b)

**Late brood rearing:** This occurs in a variety of habitats used by sage-grouse from late June to early November.

- *Late Brood-rearing habitat:* Includes mesic sagebrush and mixed shrub communities, wet meadows, and riparian habitats, as well as some agricultural lands (e.g., alfalfa fields).

**Lekking period:** This should be determined locally, but approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000 foot elevation may be used as a general distinction.

**Nesting period:** Generally April 1 through June 15.

**Winter concentration periods:** For the purpose of this plan, generally December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology. IDL shall confer with IDFG biologists for local variations.

- *Sage-Grouse winter habitats:* Occupied annually by sage-grouse and provide sufficient sagebrush cover and food to support birds throughout the entire winter (especially periods with above average snow cover).

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# Appendix B

## Implementation Plans

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# Land Board's Greater Sage-Grouse Conservation Plan Implementation

*Implementation of the Land Board's Plan is contingent upon the federal government's acceptance and incorporation of the Governor's plan in its final decisions on sage-grouse in Idaho.*

## Part I. Implementation Plan for Endowment Land Activities

The following Implementation Plan (IP) will apply to activities on state endowment trust lands within Core and Important sage-grouse Habitat Zones in response to the Land Board's Greater Sage-Grouse Conservation Plan. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- alternative energy development (solar, wind, and geothermal leases and land use permits);
- oil and gas exploration and development (leases and land use permits);
- mining (minerals leases, land use permits and construction permits);
- grazing (grazing leases, land use permits and construction permits);
- miscellaneous commercial activities (commercial leases, land use permits and construction permits); and
- granting of access through rights-of-way, including easements.

This document also addresses the implementation of fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

### I. Previous Authorizations Granted by IDL

IDL recognizes that written authorization through leases, permits and easements has been granted to third parties for activities on state endowment trust lands within Core and Important Habitat Zones prior to the approval of the IDL Greater Sage-Grouse Conservation Plan. These authorizing documents logically do not contain the conservations measures identified in the Land Board's Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important Habitat Zones.

- Within six months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within Core Habitat Zones. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.
- Within 18 months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within Important Habitat Zones. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.
- Once developed, IDL will mail the instrument modifications to the instrument holders with a cover letter explaining the purpose of the instrument modification and encourage their execution of the document due to the benefits to the greater sage-grouse and their habitat. The letter will identify a 30-day timeframe for their response.
- IDL will follow-up in writing with those instrument holders that do not respond within 30 days, offering them a second opportunity to accept the instrument modification.
- If an instrument holder does not agree to the instrument modification, IDL will attempt to make direct contact with the party to discuss the conservation measures and provide educational and supporting documents that would encourage their participation. In addition, IDL will identify which conservation measures are sticking points and give consideration, on a case-by-case basis, to negotiating conservation measure stipulations and come to an agreement on those measures that are acceptable to the instrument holder. As a fallback measure, IDL would include conservation measures as stipulations in any new authorization following the expiration of the existing authorization.

## **II. Future Authorizations to be Granted by IDL**

For new activities proposed by third parties on state endowment trust lands in Core and Important Habitat Zones and for new instruments generated following the expiration of an instrument that expires after the date of the ROD, IDL will implement conservation measures as enforceable stipulations in authorizing documents such as leases, land use permits, construction permits and rights-of-way.

IDL will develop and implement specific instrument templates that include the appropriate conservation measures as mandatory and enforceable stipulations. As a result, all new authorizations granted by IDL within Core and Important Habitat Zones will contain conservation measures in alignment with the Land Board's Greater Sage-Grouse Conservation Plan. IDL will provide these instrument templates to third parties inquiring about or making application for a proposed activity within a Core and Important habitat zone and explain the significance of these stipulations.

### III. Fire Prevention and Mitigation Measures and Wildfire Suppression Efforts

IDL does not have direct wildfire suppression responsibilities within any greater sage-grouse Core or Important habitats in Idaho. However, IDL does have jurisdictional authority for state lands within greater sage-grouse habitat.

Wildland fire protection for federal, state and private lands within greater sage-grouse habitat in southern Idaho is provided by federal agencies through the **Cooperative Fire Protection and Stafford Act Agreement** and by the cooperative efforts of volunteer RFPAs and fire service organizations (city, county and rural fire departments).

In the interest of promoting conservation efforts of the greater sage-grouse and its habitat under this plan, IDL will:

1. Provide maps to all RFPAs that include the location of any designated Core or Important greater sage-grouse habitat within their RFA boundaries by May 10, 2015 (Beginning date of closed fire season in Idaho as designated in Idaho Code Title 38 Section 115.).
2. On any fire affecting or threatening Important or Core habitat on state or private lands requiring an Incident Management Team (IMT), IDL will assign an IDL line officer to jointly work with the federal protecting agency to develop greater sage-grouse conservation objectives for fire suppression activities that will be incorporated into:
  - a. the Wildland Fire Decision Support System (WFDSS);
  - b. the Leader's Letter of Intent to the team;
  - c. the joint Delegation of Authority; and
  - d. ensure the objectives are fully implemented in daily Incident Action Plans.
3. Conservation objectives will include:
  - a. Incident priorities:
    - i. Firefighter safety
    - ii. Public Safety
    - iii. Improvements
    - iv. Resource Values
      - Sage-grouse Core and Important habitat
      - Other resource and property values (historical, archeological, recreational, aesthetics, livestock, etc.).
  - b. Utilize direct attack as the primary tactic to minimize burned acres in greater sage-grouse Core and Important habitat.
  - c. Accept relatively small acreage, short-term ground disturbance due to heavy equipment use to meet higher objectives.
  - d. Rehabilitation for burned acres will promote reestablishment of greater sage-grouse habitat within or adjacent to Core and Important habitat.
4. IDL will consider and promote fire prevention and mitigation measures including but not limited to:
  - a. Master fuel break systems across all ownerships.
  - b. Proposals to adjust fire restriction boundaries and associated use restrictions in the Idaho Fire Restrictions Plan based on protection of Core and Important greater sage-grouse habitat.

- c. Develop annual grazing plans or targeted grazing practices to reduce fuel loading in locations that would be advantageous as a wildfire control location.

## **Part II. Implementation Plan for IDL's Regulatory and Assistance Activities**

The following Implementation Plan (IP) will apply to regulatory and assistance activities administered by IDL within Core and Important sage-grouse Habitat Zones. The IP was developed in response to the Land Board's Greater Sage-Grouse Conservation Plan. Conservation measures will be voluntary best management practices on private land because IDL does not have the statutory authority within its regulatory or assistance programs to require adoption by authorized parties. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- Dredge and placer mining (exploration notices and permits);
- Surface mining (exploration notices and reclamation plans);
- Oil and gas exploration and development (seismic and drilling permits, spacing requests);
- Abandoned mine land reclamation.

### **I. Previous Authorizations Granted by IDL**

IDL recognizes that written authorizations through permit and plan approvals and contracts have been granted to third parties for activities within Core and Important Habitat Zones prior to the approval of the Land Board's Greater Sage-Grouse Conservation Plan. These authorizing documents do not contain the conservations measures identified in the Land Board's Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important Habitat Zones.
  - No outstanding abandoned mine lands contracts are present in Core and Important sage grouse Habitat Zones.
- Within 6 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within **Core** Habitat Zones. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.
- Within 18 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within Important

Habitat Zones. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.

- If impacts to greater sage-grouse habitat are irreversible, IDL will suggest working within the Idaho Mitigation Framework and utilizing the compensatory mitigation process the State Sage-Grouse Advisory Committee develops.
- Ongoing inspections of these operations will include recommendations that give guidance on how the operators can follow the conservation measures

## **II. Future Authorizations to be Granted by IDL**

IDL will develop an information brochure for oil and gas and mining operators who want to explore or develop minerals in Core and Important habitats.

For new activities proposed in Core and Important Habitat Zones and for amendments to existing approved activities, IDL will forward the applications to IDFG for comments and recommendations.

During the review process, IDL will suggest sage-grouse conservation measures to those mine operators based on:

- Feedback from IDFG
- Sage-grouse conservation measures in the IDL plan
- The specific details of the proposed mine

New abandoned mine land projects in Core and Important habitat will be implemented by IDL in conformance with the IDL Greater Sage-Grouse Conservation Plan. This includes inspections and work performed by IDL staff, as well as those performed by contractors and subcontractors.

As a result, all new authorizations granted by IDL within Core and Important Habitat Zones will include recommendations for conservations measures in alignment with the Land Board's Greater Sage-Grouse Conservation Plan. IDL will work with the operators as needed to implement the conservation measures or to implement voluntary mitigation measures, if needed.

## Appendix C

### Wildfire Protection in Idaho Responsibilities and Funding



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## **Wildfire Protection in Idaho Responsibilities and Funding Model**

### **How is fire response organized in Idaho?**

There are approximately 53.5 million acres of land in Idaho, which is divided into 16 forest protective districts. Two of these districts cover lands protected by the Forest Service and the Bureau of Land Management (BLM), and two are tribal districts. The State of Idaho – the Idaho Department of Lands (IDL) and two timber protective associations – provide direct wildfire protection on approximately 6.3 million acres of private, state and some federal forest lands.

The BLM provides primary wildfire protection on most of the lands that have sage-grouse habitat in Idaho.

Due to the scattered nature of ownership in Idaho, some state and private lands are located within federal protection areas, while some federal lands are located within state protection areas. These are known as “offset acres.” Fire managers assign a relative value to each acre to characterize how easily fires can be ignited and how difficult those fires likely will be to control. Through an “offset agreement” the federal agencies protect approximately 900,000 acres of private and state endowment land around Idaho in exchange for the State of Idaho protecting approximately 800,000 acres of federal land. Generally speaking, forested lands in Idaho are included in the offset agreement and rangelands in Idaho are not included the offset agreement.

More than 200 local and rural fire districts provide structure protection in generally non-urban parts of the state that would otherwise not have structural fire protection.

Five rangeland fire protection associations (RFPAs) assist the BLM in providing initial attack on rangelands in southern Idaho. IDL works closely with the BLM and ranchers to establish RFPAs to enable quick initial attack of range fires. Approximately 230 ranchers in southern Idaho are members of five different RFPAs, and there are six additional areas where ranchers have begun to have conversations about starting new associations. IDL expects at least one more RFPA to be formed before the start of the 2015 fire season. Continued support of RFPAs is a key part of the IDL Sage Grouse Conservation Plan. The RFPAs are volunteer initial attack organizations and are not intended to participate in extended attack situations.

Page 4 of Appendix C shows a 2014 map of forest protection district boundaries and current RFPA boundaries in Idaho.

### **Funding Fire Suppression in Idaho**

Fire protection funding is grouped into two categories – preparedness and suppression.

- **Preparedness**: The first is preparedness, providing resources to be ready in advance of an actual fire. This includes hiring firefighters, ensuring they have the necessary training, tools, and supplies, and purchasing or leasing equipment such as fire engines. In FY14 IDL spent approximately \$11 million in preparedness costs.

Preparedness on state-protected lands is funded by a combination of assessments levied on parties who own forested land, federal funds, and the State General Fund.

The forest land assessment is 60 cents per acre with a surcharge for forested parcels with structures. The IDL, in its role as the owner of endowment lands, contributes to preparedness expenses, just like private forest landowners. In FY14 IDL contributed 60 cents per acre on 974,312 endowment acres that receive protection from the fire management function of IDL, for a total of \$584,587.

In recognition that the value Idahoans place on forests is not limited to harvestable timber, Idaho Code spreads the costs of protection beyond timber. While still requiring forest landowners to provide protection, the law limits the potential liability accruing to the landowner by establishing maximum protection assessments and committing general fund tax revenue to cover expenses over that amount.

- **Suppression:** The second component of wildfire protection is suppression. There is a stable source of funding to pay wildfire suppression costs on lands protected by the State of Idaho. When personnel and equipment are dispatched to a fire managed by the State of Idaho, payment for resources assigned to the fire is made from the General Fund through deficiency warrant authority granted by the Idaho Legislature to the State Board of Land Commissioners. Contracts for aircraft also are charged to deficiency warrants. Deficiency warrant authority allows IDL to spend money to promptly suppress wildfires. Deficiency warrants have been used since at least the early 1970s. When the Idaho Legislature convenes in January it reviews the suppression bills incurred during the previous and current fiscal years, and appropriates funds to pay for the expenditures.

The 10-year average of suppression costs on lands protected by the State of Idaho, including the 2014 fire season, is approximately \$10.5 million. The 10-year average fire size on lands protected by the State of Idaho, including the 2014 fire season, is approximately 19,000 acres. In FY14, IDL employed 261 permanent employees and 202 seasonal employees. Fifty-five percent of IDL FY14 permanent employees worked in a forestry and fire capacity, and during fire season the total percentage of permanent employees contributing to IDL fire duties expands because many members of staff who are not categorized as “fire” help in fire efforts. These staff members are part of fiscal, GIS, operational leadership, administrative staff, and executive staff. Sixty percent of the IDL FY14 seasonal workforce worked in forestry and fire (38 percent in fire).

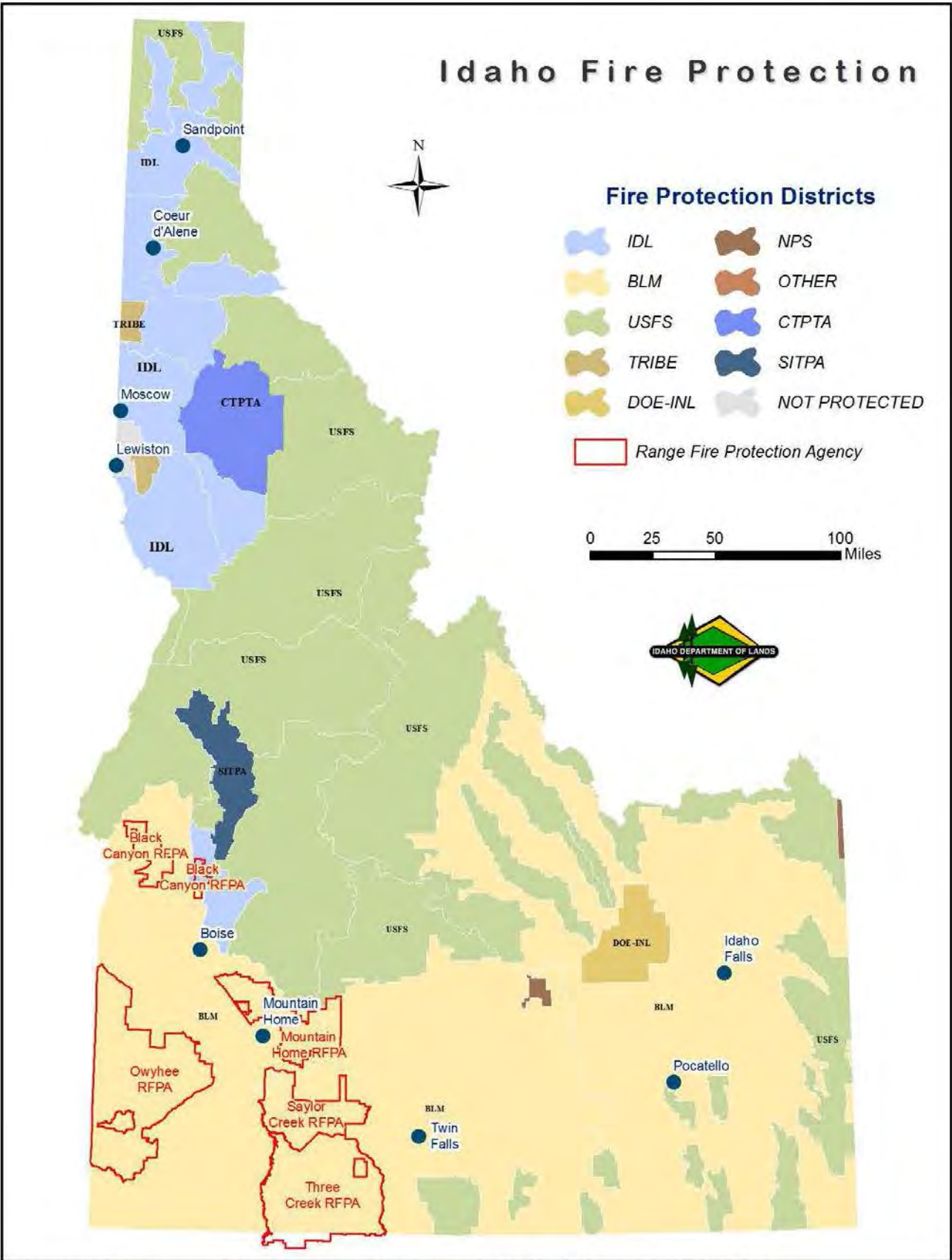
***If a fire starts on forest land in Idaho***, regardless of ownership (federal, state, or private), the protection agency (Forest Service, BLM or IDL) is responsible for paying the suppression bill, not the owner of the land where the fire starts or burns. However, if a fire investigator determines negligence is a factor in igniting a human-caused fire, the responsible party is responsible for paying the suppression costs.

***If a fire starts on privately owned rangeland***, then the responding agency (BLM, rangeland fire protection association, rural fire district, or sometimes the Forest Service) bears the cost of its own suppression action. In cases involving declared emergencies, the Federal Emergency Management Agency (FEMA) may cover a portion of the costs if communities or infrastructure are threatened. The State of Idaho does not have direct wildfire protection responsibility on rangelands.

**Currently by agreement, if a fire starts on rangeland owned by the State of Idaho,** does not spread to another ownership and is suppressed by the BLM, then the IDL will pay the suppression costs. If a fire starts on rangeland owned by the State of Idaho and spreads to another ownership, then IDL will pay a pro-rata share of the BLM's suppression costs. The IDL does not share in suppression costs when a fire starts on another ownership and spreads onto or across rangeland owned by the State of Idaho.

While IDL does incur fire suppression costs when the State of Idaho assists federal fire managers on fires they manage, the federal agencies reimburse IDL for use of State personnel and resources.

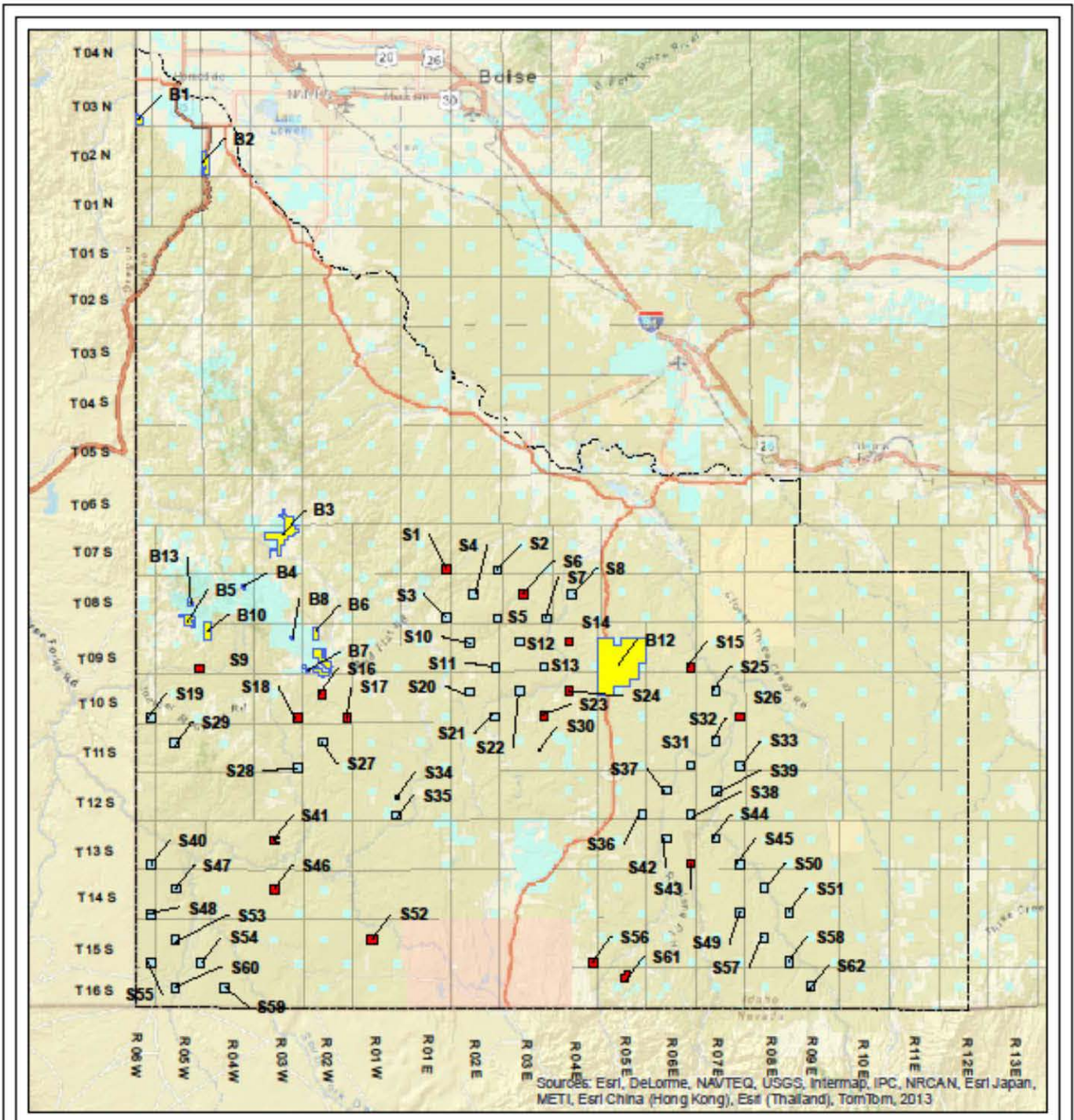
# Idaho Fire Protection



X:\Projects\mis\Map\_requests\Emily\FireProtectionLocations\_IndexMapApril2015.mxd EDY 2 April 2015

Appendix D  
Owyhee Land Exchange Map

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### Legend

- BLM Exchange Parcel
- IDL Exchange Parcel
- IDL Removed from Exchange
- Other State Lands
- Private
- Bureau of Land Management
- US Forest Service
- Other Federal Ownership/Control
- Tribal Lands
- Owyhee County Boundary

## Owyhee Land Exchange

### Parcel Index Map

2/18/2015

Scale 1:1,350,000

0 5 10 Miles

### Map Notes

Projection: Idaho Transverse Mercator, NAD 27  
 Map Notes and Data Sources:  
 BLM Exchange Data as of Feb. 2014  
 IDL Ownership Data current as of map date

**Disclaimer:**  
 This map has been compiled using the best information available to the Idaho Department of Lands at the time and may be updated and/or revised without notice. In situations where known accuracy and completeness is required, the user has the responsibility to verify the accuracy of the map and the underlying data sources.



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Appendix E  
Monitoring Plan  
(To be completed)

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## Appendix F

### State Board of Land Commissioners Approval Memo

## STATE BOARD OF LAND COMMISSIONERS

April 21, 2015

Regular Agenda

### SUBJECT

IDL Proposed Greater Sage-Grouse Conservation Plan

### BACKGROUND

The Greater Sage-grouse (sage-grouse) is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan to be considered by the BLM in the EIS alternative analysis.

In October 2014, Director Tom Schultz established a working group which consisted of various IDL staff which oversee programs potentially impacted by the listing of the sage-grouse. This group held regular meetings to develop recommended conservation measures as part of IDL's Proposed Greater Sage-Grouse Conservation Plan based on the group's review of the science and what other western states are proposing, as well as designed to be complementary to Governor's Alternative for federal land management in Idaho.

For proposed activities by third parties on state endowment trust lands, IDL will implement sage-grouse conservation measures as enforceable stipulations in authorizing documents such as leases, permits, and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities, conservation measures will be voluntary best management practices (BMP's) on private land because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: Abandoned Mine Lands Projects; Dredge and Placer Mine Permits; Mine Reclamation Plan Approvals; and Oil and Gas Permits (seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended best management practices within its authorizing documents to encourage compliance.

Additionally, for some fire programs, IDL will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

## DISCUSSION

On February 17, 2015, Idaho Department of Lands (IDL) presented the Proposed Greater Sage-Grouse Conservation Plan to the Land Board as an information item. IDL sought initial feedback from the Land Board and indicated IDL would initiate an extensive stakeholder outreach effort and then come back to the Land Board for final approval of the plan at a future meeting.

Since that time IDL has completed the stakeholder outreach effort across all industries potentially impacted by the plan soliciting feedback on the Proposed Greater Sage-Grouse Conservation Plan using group and individual meetings. These meetings included direct discussions regarding language in the plan and the impacts of the proposed conservations measures on their industry practices.

IDL has revised the Proposed Greater Sage-Grouse Conservation Plan (Attachment 1) based on the feedback from stakeholder groups and on-going interactions with sister agencies. A summary of comments received by IDL is included as Attachment 2. A table of all comments received, with IDL responses, is included as Attachment 3. In addition, IDL's response to the U.S. Fish and Wildlife Service comment letter, written in conjunction with the Office of Species Conservation and Governor's Office, is included as Attachment 4. Finally, an informational sheet with key elements of the draft plan is Attachment 5.

## RECOMMENDATION

The Department recommends the Board approve the proposed Plan.

Upon approval, implementation of the Plan will be contingent on the federal agencies (USFWS and BLM) acceptance and incorporation of the Governor's Plan into the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS. Implementation will begin within 60 days of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS.

If the ROD does not include the foundational elements of the Governor's Plan, IDL will reevaluate, revise the Plan if necessary and inform the Board or seek approval as needed.

## BOARD ACTION

A motion was made by Controller Woolf that the Board adopt the Department recommendation, including the language of the second and third paragraphs in the Department's recommendation, and approve the proposed Plan. Attorney General Wasden seconded the motion. The motion carried on a vote of 5-0.

## ATTACHMENTS

1. Proposed Greater Sage-Grouse Conservation Plan
2. Proposed Greater Sage-Grouse Conservation Plan Comment Summary
3. Proposed Greater Sage-Grouse Conservation Plan Comment and Response Matrix
4. IDL Response to USFWS Comments on Draft Sage Grouse Plan
5. Key Elements of the Draft Plan



## Appendix G

### Idaho Oil and Gas Conservation Commission Approval Memo



# IDAHO OIL AND GAS CONSERVATION COMMISSION

April 23, 2015

Regular Agenda

## SUBJECT

IDL Proposed Greater Sage-Grouse Conservation Plan

## BACKGROUND

The Greater Sage-grouse (sage-grouse) is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan to be considered by the BLM in the EIS alternative analysis. In October 2014, IDL Director Tom Schultz established a working group which consisted of various IDL staff which oversee programs potentially impacted by the listing of the sage-grouse. This group held regular meetings to develop recommended conservation measures as part of IDL's Proposed Greater Sage-Grouse Conservation Plan based on the group's review of the science and what other western states are proposing, as well as designed to be complementary to Governor's Alternative for federal land management in Idaho.

As a result, IDL will implement sage-grouse conservation measures as enforceable lease stipulations for proposed oil and gas development activities occurring on state endowment lands. Regarding oil and gas regulatory activities under the purview of the Commission, IDL has developed voluntary conservation measures. These conservation measures will be presented as recommended best management practices (BMP's) to companies applying for drilling permits. These companies will then select which BMP's they can comply with to be incorporated as permit conditions. These BMP's will then become required and verified through the inspection process.

## DISCUSSION

On February 12, 2015 the Idaho Department of Lands (IDL) presented the Proposed Greater Sage-Grouse Conservation Plan to the Commission as an informational item. IDL sought initial feedback from the Commission and indicated IDL would initiate an extensive stakeholder outreach effort and then come back to the Commission for final approval of the plan at a future meeting.

Since that time IDL has completed the stakeholder outreach effort by soliciting feedback on the Proposed Greater Sage-Grouse Conservation Plan using group and individual meetings. These meetings

included direct discussions regarding language in the plan and the impacts of the proposed conservation measures on practices of the oil and gas industry.

IDL has revised the Proposed Greater Sage-Grouse Conservation Plan (Attachment 1) based on the feedback from stakeholder groups and on-going interactions with sister agencies. Excerpts from the plan for the Commission's consideration are included as Attachment 2. A summary of the comments received by IDL pertaining to oil and gas is included as Attachment 3. A copy of all comments received related to Oil and Gas, with IDL responses, is included as Attachment 4. Finally, IDL's response to the U.S. Fish and Wildlife Service comment letter, written in conjunction with the Office of Species Conservation and Governor's Office, is included as Attachment 5.

Implementation of the Proposed Greater Sage-Grouse Conservation Plan will occur through voluntary agreements between industry and IDL. Updated Standard Operating Procedures will call for IDL to provide applicants requesting permits to drill within core and important habitat with Conservation Measures (CM's). Applicants will then acknowledge which, if any, CM's can be complied with and incorporated as enforceable permit conditions. Monitoring of CM's stipulated to will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include sections for documenting implementation of CM's as well as an assessment of effectiveness.

#### RECOMMENDATION

The Department recommends the Commission approve the applicable sections of Part II of the proposed Plan.

Upon approval, implementation of the Plan will be contingent on the federal agencies (USFWS and BLM) acceptance and incorporation of the Governor's Plan into the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS. Implementation will begin within 60 days of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS.

If the ROD does not include the foundational elements of the Governor's Plan, IDL will reevaluate and revise the Plan if necessary and inform the Commission or seek approval as needed.

#### COMMISSION ACTION

A motion was made by Commissioner Classen that the Commission approve the recommendation. Vice Chairman Chipman seconded the motion. The motion carried on a vote of 5-0.

#### ATTACHMENTS

6. Proposed Greater Sage-Grouse Conservation Plan
7. Excerpts for Oil and Gas Conservation Commission Consideration
8. Oil and Gas Related Comment Summary
9. Oil and Gas Related Comment and Response Matrix
10. IDL Response to USFWS Comments on Draft Sage Grouse Plan





Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Fedex Receipts

1 message

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**Magaletti, Matthew** <mmagalet@blm.gov>

Fri, May 29, 2015 at 11:09 AM

To: John Carlson <jccariso@blm.gov>, Quincy Bahr <qfbahr@blm.gov>, Joan Suther <jsuther@blm.gov>, Erin Jones <erjones@blm.gov>, Bridget Clayton <bclayton@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, "Munson, Johanna" <jmunson@blm.gov>

Hello All,

Attached are the receipts from the FedEx packages we sent to the Governors for your Admin record?

Thanks!

---

**Matthew Magaletti**

Planning and Environmental Analyst  
Bureau of Land Management, WO-210  
(202) 912-7085



**Fed ExLabels Governor's GRSG DVD May 2015 (1).pdf**  
1535K

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Gregorio Garcia Phone (303) 236-7639

BUREAU OF LAND MANAGEMENT

BLDG 41ENT E-16

DENVER State CO ZIP 80225

Internal Billing Reference 0777

Governor John Hickenlooper Phone ( )

136 State Capitol Bldg. Dept./Floor/Suite/Room

Denver State CO ZIP 80203

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- FedEx Priority Overnight  
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- FedEx Standard Overnight  
Next business afternoon.\* Saturday Delivery NOT available.
- FedEx 2Day A.M.  
Second business morning.\* Saturday Delivery NOT available.
- FedEx 2Day  
Second business afternoon.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.

**5 Packaging** \* Declared value limit \$500.

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Package may be left without obtaining a signature for delivery.
- Direct Signature  
Someone at recipient's address may sign for delivery. *Fee applies.*
- Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. *Fee applies.*

Does this shipment contain dangerous goods?  
One box must be checked.

- No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry ice, 9, UN 1845 x kg
- Cargo Aircraft Only

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Total Packages Total Weight Total Declared Value<sup>†</sup>  
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Governor Brian Sandoval Phone ( )

101 N. Carson Street Dept./Floor/Suite/Room

Carson City State NV ZIP 89701

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Next business morning.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight  
Next business afternoon.\* Saturday Delivery NOT available.
- FedEx 2Day A.M.  
Second business morning.\* Saturday Delivery NOT available.
- FedEx 2Day  
Second business afternoon.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.

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- No Signature Required  
Package may be left without obtaining a signature for delivery.
- Direct Signature  
Someone at recipient's address may sign for delivery. *Fee applies.*
- Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. *Fee applies.*

Does this shipment contain dangerous goods?  
One box must be checked.

- No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry ice, 9, UN 1845 x kg
- Cargo Aircraft Only

**7 Payment Bill to:**

- Sender Acct. No. in Section 7 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

Total Packages Total Weight Total Declared Value<sup>†</sup>  
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City: DENVER State: CO ZIP: 80225

Internal Billing Reference: 0777

Sender's Name: Governor C.L. "Butch" Otter

Address: 700 West Jefferson St

City: Boise State: ID ZIP: 83702

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Recipient's Name: BUREAU OF LAND MANAGEMENT Phone: (303) 234-7639

Address: BLDG 41ENT E-16

City: DENVER State: CO ZIP: 80225

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Sender's Name: Governor Jerry Brown

Address: State Capitol Building Suite 1173

City: Sacramento State: CA ZIP: 95814

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- Packaging options: FedEx Envelope, Pak, Box, Tube, Other.

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Total Packages, Total Weight, Total Declared Value

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- Service options: FedEx First Overnight, Priority Overnight, Standard Overnight, 2Day A.M., 2Day, Express Saver.

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Special Handling and Delivery Signature Options

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Gregorio Garcia Phone (303) 236-7639
BUREAU OF LAND MANAGEMENT
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DENVER State CO ZIP 80225

Internal Billing Reference 0777

Recipient's Name Governor Jack Dalrymple Phone ( )

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Bismark State ND ZIP 58505-0100

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No Signature Required
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Indirect Signature
Does this shipment contain dangerous goods?
No
Yes
Dry Ice
Cargo Aircraft Only

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- 5 Packaging
FedEx Envelope
FedEx Pak
FedEx Box
FedEx Tube
Other

6 Special Handling and Delivery Signature Options

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No Signature Required
Direct Signature
Indirect Signature
Does this shipment contain dangerous goods?
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Yes
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Internal Billing Reference 0777

Governor Kate Brown Phone ( )

900 Court Street

Salem State OR ZIP 97301-4047

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- FedEx Standard Overnight
- FedEx 2Day A.M.
- FedEx 2Day
- FedEx Express Saver

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- FedEx Envelope\*
- FedEx Pak\*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery
- No Signature Required
- Direct Signature
- Indirect Signature

Does this shipment contain dangerous goods? One box must be checked.
   
 No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry Ice, 9, UN 1845 x kg
   
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.  Cargo Aircraft Only

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Governor Gary Herbert Phone ( )

350 North State Street Suite 200

Salt Lake City State UT ZIP 84114-2220

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5 Packaging \* Declared value limit \$500.

- FedEx Envelope\*
- FedEx Pak\*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery
- No Signature Required
- Direct Signature
- Indirect Signature

Does this shipment contain dangerous goods? One box must be checked.
   
 No  Yes As per attached Shipper's Declaration.  Yes Shipper's Declaration not required.  Dry Ice Dry Ice, 9, UN 1845 x kg
   
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.  Cargo Aircraft Only

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- Third Party
- Credit Card
- Cash/Check

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Sender's FedEx Account Number

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Recipient's Name: **Gregorio Garcia** Phone: **(303) 236-7639**

Company: **BUREAU OF LAND MANAGEMENT**

Address: **BLDG 41ENT E-16**

Dept./Floor/Suite/Room

City: **DENVER** State: **CO** ZIP: **80225**

Internal Billing Reference

0777

Client's Name: **Governor Steve Bullock** Phone: ( )

Company: \_\_\_\_\_

Address: **1301 E. 6th Avenue**

Dept./Floor/Suite/Room

Address: \_\_\_\_\_  
is line for the HOLD location address or for continuation of your shipping address.

City: **Helena** State: **MT** ZIP: **59601**

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**10:30 am 5/28/15** 0117364217

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**Next Business Day**

- FedEx First Overnight**  
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Priority Overnight**  
Next business morning.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight**  
Next business afternoon.\* Saturday Delivery NOT available.

**2 or 3 Business Days**

- FedEx 2Day A.M.**  
Second business morning.\* Saturday Delivery NOT available.
- FedEx 2Day**  
Second business afternoon.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver**  
Third business day.\* Saturday Delivery NOT available.

**5 Packaging** \* Declared value limit \$500.

- FedEx Envelope\***  **FedEx Pak\***  **FedEx Box**  **FedEx Tube**  **Other**

**6 Special Handling and Delivery Signature Options**

- SATURDAY Delivery**  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required**  
Package may be left without obtaining a signature for delivery.
- Direct Signature**  
Someone at recipient's address may sign for delivery. *Fee applies.*
- Indirect Signature**  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. *Fee applies.*

**Does this shipment contain dangerous goods?**

- One box must be checked.
- No**  **Yes** As per attached Shipper's Declaration.  **Yes** Shipper's Declaration not required.
  - Dry Ice** Dry ice, 9, UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg
  - Cargo Aircraft Only**
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

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- Sender** Acct. No. in Section 1 will be billed.
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Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## FW: Livestock - updated language question

1 message

Lauren Mermejo &lt;lmermejo@blm.gov&gt;

Wed, Feb 18, 2015 at 6:35 PM

To: jmbeck@blm.gov, Quincy Bahr &lt;qfbahr@blm.gov&gt;, Randall Sharp &lt;sharpay@att.net&gt;

Cc: Joan Suther &lt;jsuther@blm.gov&gt;, holly.prohaska@empesi.com, Peter Gower &lt;peter.gower@empesi.com&gt;, jvialpando@blm.gov, Kathryn Dyer &lt;kdyer@blm.gov&gt;

Please see the [WO response to a question on the WO grazing language concerning defined responses where NEPA would not have to be done again....Follow the trail from the bottom....this will be very helpful at the implementation phase.](#)

Lauren

From: Carman, Stephanie [mailto:[scarman@blm.gov](mailto:scarman@blm.gov)]

Sent: Wednesday, February 18, 2015 1:14 PM

To: Suther, Joan; Vicki Herren; Matthew Magaletti; Michael Hildner; Lauren Mermejo

Subject: Re: Livestock - updated language question

I think that would be fine. We can also share this example/question with the rest of the regions to help them better understand.

Stephanie Carman

Bureau of Land Management

Sage-Grouse Project Coordinator (Acting)

office 202-208-3408

mobile 202-380-7421

[scarman@blm.gov](mailto:scarman@blm.gov)On Wed, Feb 18, 2015 at 3:59 PM, Suther, Joan <[jsuther@blm.gov](mailto:jsuther@blm.gov)> wrote:

Thanks. Yes, it does. Is there any reason not to include such an example in our narrative?

Joan Suther

Greater Sage-grouse Project Manager

Oregon Sub-region

541-573-4445 Office

541-589-0251 Cell

541-573-4411 Fax

On Wed, Feb 18, 2015 at 11:42 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Hi Joan -

I have checked with Vicki, who checked with Kimberley Hackett in the Range Program, and we offer the following suggestion. In short, the potential response needs to be in the alternative that is chosen for the decision. Kim offers up other actions that could be in an alternative. Does this clarify?

For a permit renewal EA, riparian habitat in a few areas is not meeting desired conditions. Within a couple different alternatives, several approaches were considered to resolve the issue. For Alternative A, modification of the grazing season was applied and included a provision for fencing if the desired conditions were not met. In this case, the fencing is included as part of the decision, but no additional analysis or decision would be needed.

In another example,

For Alternative A, modification of the grazing season was applied and included a provision for temporarily closing all or a portion of a pasture/allotment if the desired conditions were not met. In this case, the closure is included as part of the decision, but no additional analysis or decision would be needed.

Stephanie Carman

Bureau of Land Management

Sage-Grouse Project Coordinator (Acting)

office 202-208-3408

mobile 202-380-7421

[scarman@blm.gov](mailto:scarman@blm.gov)

On Tue, Feb 17, 2015 at 6:55 PM, Suther, Joan <[jsuther@blm.gov](mailto:jsuther@blm.gov)> wrote:

Hi all - this direction regarding NEPA is still unclear to me.

- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and Land Health Standards (43 CFR 4180.2) and defined responses that will allow the

authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.

Here is a short example of how we think this would be applied by having an adequate range of alternatives initially. Is this along the lines of what you are intending?

*For a permit renewal EA, riparian habitat in a few areas is not meeting desired conditions. Within a couple different alternatives, several approaches were considered to resolve the issue. For Alternative A, modification of the grazing season was applied. In Alternative B, fencing was considered. Alternative A was the decision. Subsequent monitoring revealed that desired conditions were still not found. In this case, the fencing alternative would be a new decision, but no additional analysis would be needed.*

Joan Suther

Greater Sage-grouse Project Manager

Oregon Sub-region

541-573-4445 Office

541-589-0251 Cell

541-573-4411 Fax



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## Fwd: Frequently Asked Questions

1 message

Lauren Mermejo &lt;lmermejo@blm.gov&gt;

Thu, Jan 22, 2015 at 1:16 PM

To: Quincy Bahr <qfbahr@blm.gov>, Joan Suther <jsuther@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, Jessica A Rubado <jarubado@blm.gov>, Brent Ralston <bralston@blm.gov>, Lauren L Mermejo <lmermejo@blm.gov>, Melvin Tague <jtague@blm.gov>

Cc: Leisa Wesch &lt;lwesch@blm.gov&gt;

Heads-up, and please heed: Please have your GIS folks hold off on completing ANY of the allocation maps at this time....more info coming early next week

Sent from my iPhone  
Lauren

Begin forwarded message:

From: Stephanie Carman &lt;scarman@blm.gov&gt;

Date: January 22, 2015 at 12:31:44 PM MST

To: Matthew Magaletti &lt;mmagalet@blm.gov&gt;, Lauren Mermejo &lt;lmermejo@blm.gov&gt;

Cc: Glen Stein &lt;gstein@fs.fed.us&gt;, David Batts &lt;david.batts@empssi.com&gt;, "Dillon, Madelyn - FS" &lt;mdillon@fs.fed.us&gt;

Subject: Re: Frequently Asked Questions

Also, the states with SFAs should hold off on allocations/maps until the SFA discussions are completed this weekend. We will discuss on the Tuesday call.

**Stephanie Carman**

Mobile 202 380 7421

Sent from my iPhone

On Jan 22, 2015, at 11:00 AM, Carman, Stephanie &lt;scarman@blm.gov&gt; wrote:

Below are some common questions, and basic answers, on the direction that came out this week. We will thoroughly discuss on the calls next week. Note, state specific questions are not included.

Also, please note that we will be providing updated guidance, including minor clarifications and corrections, to the State Directors tomorrow.

Please let me know if you get any other common questions. Thanks for all of your work on this.

### Frequently Asked Questions

Are these final? We are making minor changes/corrections which will be distributed to the State Directors on Friday.

Can we modify the Vegetative Objective Table? No, the indicators must stay the same. However, you can have a range of values.

*Does the Vegetative Objectives Table apply to Priority and General Habitat? Yes.*

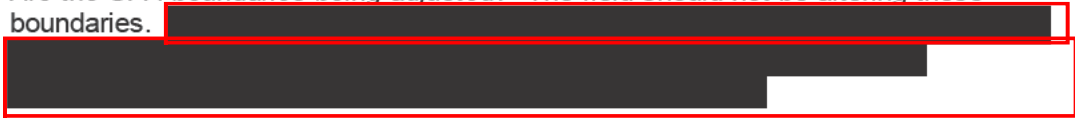
*Do the NSO provisions apply only to oil and gas? No, it applies to all fluid minerals including geothermal. We are correcting the guidance.*

*Which data layer gets submitted to the NOC for ROWs? The data layer for High Voltage Transmission Lines and Major Pipelines should be submitted, not the minor ROWs layer.*

*Do we keep buffers established as management actions in our plans? Yes, keep existing buffer decisions in the plans. However, these will not be submitted to the NOC as an allocation decision, with the exception of fluid mineral allocations in CO, WY and MT.*

*Does the buffer direction supersede the allocation and other management actions? No, it is part of project implementation. When presented with an action, you will 1) check allocations – can you do this in PHMA/GHMA? 2) does this meet the density/disturbance calculation? 3) apply any buffers established as management actions in your plan 4) apply the USGS buffer direction*

*Are the SFA boundaries being adjusted? The field should not be altering these boundaries.*

A large rectangular area of the document is redacted with black ink. The redaction covers several lines of text, including the question and answer regarding SFA boundaries. The redacted area is outlined in red.

*How will WAFWA Management Zone Teams integrate with existing state and local working groups? As these are established, you should work to include the same parties, consistent with FACA.*

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)



Beck, Jonathan <jmbeck@blm.gov>

---

## FS Plan

1 message

---

Lauren Mermejo <lmermejo@blm.gov>

Mon, Feb 23, 2015 at 9:21 AM


To: jmbeck@blm.gov, Brent Ralston <bralston@blm.gov>

Hi Jon –

Attached is the FS Proposed Plan for drop into Chapter 2.

Lauren

---

 ID Draft Proposed Planning Language V24.docx  
100K

# Idaho and SW Montana Forest Service Proposed Plan Amendment

---

## Forest Service Plan Components

**Desired conditions** - A description of specific social, economic, and/or ecological characteristics of the plan area, or a portion of the plan area, toward which management of the land and resources should be directed. Desired conditions must be described in terms that are specific enough to allow progress toward their achievement to be determined, but do not include completion dates. (36 CFR 219.7(e)(1)(i)) FSH 1909.12, Chapter 20)

**Guideline** – A constraint on project and activity decisionmaking that allows for departure from its terms, so long as the purpose of the guideline is met. (§ 219.15(d)(3)). Guidelines are established to help achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.7(e)(1)(iv); FSH 1909.12, Chapter 20)

**Objective** - A concise, measurable, and time-specific statement of a desired rate of progress toward a desired condition or conditions. Objectives should be based on reasonably foreseeable budgets. (36 CFR 219.9(e)(1)(ii)) FSH 1909.12, Chapter 20)

**Standard** - A mandatory constraint on project and activity decisionmaking, established to help achieve or maintain the desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. (36 CFR 219.7(e)(1) (iii)) FSH 1909.12, Chapter 20)

## General Greater Sage-grouse

**GRSG-GEN-DC-001-Desired Condition** – The landscape for greater sage-grouse encompasses large contiguous areas, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist, with variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.

**GRSG-GEN-DC-002-Desired Condition** – Anthropogenic disturbance is focused in non-habitat areas outside of priority, sagebrush focal, important, and general habitat management areas<sup>1</sup>. Disturbances in general habitat management areas are limited, and there is little to no disturbances in priority, sagebrush focal, and important habitat management areas except for valid existing rights and existing authorize uses.

**GRSG-GEN-DC-003-Desired Condition** – In all seasonal habitats, 70% of lands capable of producing sagebrush have 10 to 30% sagebrush canopy cover and less than 10% conifer canopy cover. In addition, within breeding and nesting habitat, sufficient herbaceous vegetation structure and height provides overhead and lateral concealment for nesting and early brood rearing life stages. Within brood rearing habitat, wet meadows and riparian areas sustain a rich diversity of perennial forb species relative to site potential. Within winter habitat, sufficient sagebrush height

---

<sup>1</sup> Suitable greater sage-grouse habitat within polygons identified as priority or general habitat management areas. Areas of non-habitat within a polygon are not included as part of any priority or general habitat management areas. Sagebrush focal areas may include areas of non-habitat.

and density provides food and cover for greater sage-grouse during this seasonal period. Specific desired conditions for greater sage-grouse based on seasonal habitat requirements are in table 1.

**Table 1. Seasonal Habitat Desired Conditions for Greater Sage-grouse.**

ATTRIBUTE	INDICATORS	DESIRED CONDITON
<b>BREEDING AND NESTING<sup>1,2,3</sup> (Seasonal Use Period March 1-June 15) Apply 6.2 miles from active leks.<sup>4</sup></b>		
Lek Security	Proximity of trees <sup>5</sup>	Trees or other tall structures are none to uncommon within 1.86 miles of leks <sup>6,7</sup>
	Proximity of sagebrush to leks <sup>6</sup>	Adjacent protective sagebrush cover within 328 feet of lek <sup>6</sup>
Cover	Seasonal habitat extent <sup>7</sup>	>80% of the breeding and nesting habitat
	Sagebrush canopy cover <sup>6,7,8</sup>	15 to 25%
	Sagebrush height <sup>7</sup> Arid sites <sup>6,7,9</sup> Mesic sites <sup>6,7,10</sup>	12 to 32 inches 16 to 32 inches
	Predominant sagebrush shape <sup>6</sup>	>50% in spreading <sup>11</sup>
	Perennial grass canopy cover <sup>6,7</sup> Arid sites <sup>7,9</sup> Mesic sites <sup>7,10</sup>	≥10% ≥15%
	Perennial grass height <sup>6,7,8</sup>	Provide overhead and lateral concealment from predators <sup>7</sup>
	Perennial forb canopy cover <sup>6,7,8</sup> Arid sites <sup>9</sup> Mesic sites <sup>10</sup>	≥5% <sup>6,7</sup> ≥10% <sup>6,7</sup>
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>		
Cover	Seasonal habitat extent <sup>7</sup>	>40% of the brood-rearing/summer habitat
	Sagebrush canopy cover <sup>6,7,8</sup>	10 to 25%
	Sagebrush height <sup>7,8</sup>	16 to 32 inches
	Perennial grass canopy cover and forbs <sup>7,8</sup>	>15%
	Riparian areas/mesic meadows	Proper Functioning Condition <sup>12</sup>
	Upland and riparian perennial forb availability <sup>6,7</sup>	Preferred forbs are common with several preferred species present <sup>13</sup>
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>		
Cover and Food	Seasonal habitat extent <sup>6,7,8</sup>	>80% of the winter habitat
	Sagebrush canopy cover above snow <sup>6,7,8</sup>	>10%
	Sagebrush height above snow <sup>6,7,8</sup>	>10 inches <sup>14</sup>
<p><sup>1</sup>Seasonal dates can be adjusted; that is, start and end dates may be shifted either earlier or later, but the amount of days cannot be shortened or lengthened by the local unit.</p> <p><sup>2</sup>Doherty, K. 2008. <i>Sage-grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts</i>. University of Montana. Missoula, MT.</p> <p><sup>3</sup>Holloran and Anderson. 2005. <i>Spatial Distribution of Greater Sage-grouse nests in relatively contiguous sagebrush habitats</i>. Condor 107:742-752.</p> <p><sup>4</sup>Buffer distance may be changed only if 3 out of 5 years of telemetry studies indicate the 4 miles is not appropriate.</p> <p><sup>5</sup>Baruch-Mordo, S. J.S. Evans, J.P Severson, D.E. Naugle, J. D. Maestas, J.M. Kiesecker, M.J. Falkowski. C.A. Hagen, and K.P. Reese. . 2013. <i>Saving sage-grouse from trees: A proactive solution to reducing a key threat to a candidate species</i>. Biological Conservation 167: 233-241.</p> <p><sup>6</sup>Stiver, S.J., E.T. Rinkes, D.E. Naugle, P.D. Makela, D.A. Nance, and J.W. Karl, eds. 2015. Sage-Grouse Habitat Assessment Framework: A Multiscale Assessment Tool. Technical Reference 6710-1. Bureau of Land Management and Western Association of Fish and Wildlife Agencies, Denver, Colorado.</p> <p><sup>7</sup>Connelly, J. M. A. Schroweder, A.R. Sands, and C.E. Braun.2000. Guidelines to manage sage-grouse populations and their habitats. Wildlife Society Bulletin 28 (4): 967-985.</p> <p><sup>8</sup>Connelly, J. K. Reese, and M. Schroder. 2003. <i>Monitoring of Greater sage-grouse habitats and populations</i>. Station Bulletin 80, Contribution 979. University of Idaho, College of Natural Resources Experiment Station. Moscow, ID.</p> <p><sup>9</sup>10–12 inch precipitation zone; <i>Artemisia tridentata wyomingensis</i> is a common big sagebrush sub-species for this type site (HAF 2014).</p> <p><sup>10</sup>≥12 inch precipitation zone; <i>Artemisia tridentata vaseyana</i> is a common big sagebrush sub-species for this type site (HAF 2014).</p> <p><sup>11</sup>Sagebrush plants with a spreading shape provide more protective cover than sagebrush plants that are more tree- or columnar shaped (HAF 2014).</p> <p><sup>12</sup>Existing land management plan desired conditions for riparian areas/wet meadows (spring seeps) may be used in place of properly functioning conditions, if appropriate for meeting greater sage-grouse habitat requirements.</p> <p><sup>13</sup>Preferred forbs are listed in HAF Table III-2 (HAF 2014). Overall total forb cover may be greater than that of preferred forb cover since not all forb species are listed as preferred in Table III-2.</p> <p><sup>14</sup>The height of sagebrush remaining above the snow depends upon snow depth in a particular year. Intent is to manage for tall, healthy, sagebrush stands.</p>		



**GRSG-GEN-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not permit new lands or recreation special use authorizations unless all existing discrete anthropogenic disturbances cover less than 3% of the total greater sage-grouse habitat within the Biologically Significant Unit and the proposed project analysis area, regardless of ownership (Appendix Z – Disturbance Cap Guidance).

**GRSG-GEN-ST-002-Standard** - In priority, sagebrush focal, and important management areas, only allow new authorized land uses if the residual impacts to greater sage-grouse or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix X).

**GRSG-GEN-GL-001-Guideline** - During lekking (March 1 to April 30) surface disturbing and disruptive activities, including noise at 10dB above ambient (not to exceed 20-24 dB) to lekking birds should be restricted from 6 pm to 9 am at a distance of 3.1 miles from the perimeter of an occupied lek.

**GRSG-GEN-GL-002-Guideline** – During breeding and nesting (March 1 to June 15), surface disturbing and disruptive activities to nesting birds should be restricted.

**GRSG-GEN-GL-003-Guideline** - When breeding and nesting habitat overlaps with other seasonal habitats, habitat should be managed for breeding and nesting desired habitat conditions displayed in table 1.

**GRSG-GEN-GL-004-Guideline** – Development of tall structures within 2.0 miles from the perimeter of occupied leks, as determined by local conditions (such as vegetation or topography), with the potential to disrupt breeding or nesting by creating new perching/nesting opportunities avian predators or by decreasing the use of an area, should be restricted in nesting habitat.

## Adaptive Management

**GRSG-AM-ST-001-Standard** – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from greater sage-grouse conservation objectives. The hard trigger response will be an entire restrictive alternative, or one or more appropriate components of a more restrictive alternative, such as the immediate cessation of authorizing land use authorizations. An interagency team will conduct an assessment to determine the causal factor(s) and recommend corrective strategies (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-002-Standard** – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, with consideration of local knowledge and conditions (Appendix Z - Adaptive Management Guidance and Sideboards).

## Lands and Realty

### Special Use Authorizations (non recreation)

**GRSG-LR-SUA-O-001-Objective** - In priority, sagebrush focal, and important habitat management areas, retrofit existing tall structures (e.g., power poles, cellular towers) with perch deterrents or other anti-perching devices within 2 years of signing the Record of Decision.

**GRSG-LR-SUA-ST-001-Standard** – In priority and sagebrush focal habitat management areas, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to greater sage-grouse will be avoided by the exception.

**GRSG-LR-SUA-ST-002-Standard** – In general habitat management areas, new lands special use authorizations may be authorized for infrastructure, such as high-voltage transmission lines and major pipelines, if they can be located within existing designated corridors and the authorization includes stipulations to protect greater sage-grouse and their habitats.

**GRSG-LR-SUA-ST-003-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize temporary lands special uses (i.e., facilities or activities) that result in loss of habitat or would have long-term (greater than 5 years) negative impact on greater sage-grouse or their habitats.

**GRSG-LR-SUA-ST-004-Standard** – In priority, sagebrush focal, important, and general habitat management areas, require protective stipulations (e.g., noise, tall structure, guy wire removal, perch deterrent installation) when issuing new authorizations or during renewal, amendment, or reissuance of existing authorizations that authorize infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers).

**GRSG-LR-SUA-ST-005-Standard** – In priority, sagebrush focal, important, and general habitat management areas, locate upgrades to existing transmission lines within the existing designated corridors unless an alternate route would benefit greater sage-grouse or their habitats.

**GRSG-LR-SUA-ST-006-Standard** - In priority, sagebrush focal, important, and general habitat management areas, when a lands special use authorization is revoked or terminated and no future use is contemplated the authorization holder must remove overhead lines and other infrastructure in compliance with 36 CFR 251.60(i).

**GRSG-LR-SUA-ST-007-Standard** - In priority, sagebrush focal, important, and general habitat management areas, if the potential long-term (greater than 5 years) impacts of mitigation (e.g., relocation or burying) to greater sage-grouse or their habitats are greater than the potential impacts from new lands special use authorizations, do not pursue the mitigation. If mitigation is not feasible or would result in short-term (less than 5 years) or long-term impacts, incorporate additional terms and conditions in the special use authorization for protection of greater sage-grouse or their habitats

**GRSG-LR-SUA-ST-008-Standard** – In priority, sagebrush focal, important, and general habitat management areas, co-locate new infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers) with existing infrastructure to limit disturbance to the smallest footprint, or where it best limits impacts to greater sage-grouse or their habitats. When co-location of new infrastructure is not accomplished,

locate it adjacent to existing infrastructure, roads, or already disturbed areas. Consider new communication tower sites where necessary for public safety.

**GRSG-LR-SUA-GL-001-Guideline** – In priority and sagebrush focal management areas, outside of existing designated corridors, new transmission lines and pipelines should be buried to limit disturbance to the smallest footprint unless explicit rationale is provided that the biological impacts to greater sage-grouse and its habitat are being avoided. When new transmission lines and pipelines are not buried, locate them adjacent to existing transmission lines.

## Land Ownership Adjustments

**GRSG-LR-LOA-ST-001-Standard** – In priority, sagebrush focal, important, and general habitat management areas, do not approve land ownership adjustments unless the action results in a net conservation gain to greater sage-grouse or they will not directly or indirectly adversely impact greater sage-grouse conservation.

**GRSG-LR-LOA-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas with minority federal ownership, consider land ownership adjustments to achieve a landownership pattern (e.g., consolidation, reducing fragmentation) that supports improved greater sage-grouse population trends and habitats.

## Land Withdrawal

**GRSG-LR-LW-GL-001-Guideline** – In priority, sagebrush focal, and important habitat management areas, utilize land withdrawals as a tool, where appropriate and subject to valid existing rights, to prevent activities that will be detrimental to greater sage-grouse or their habitats.

## Wind and Solar

**GRSG-WS-ST-001-Standard** – In priority and sagebrush focal management areas, do not authorize new solar and wind utility-scale and/or commercial energy development except for on-site power generation associated with existing industrial infrastructure (e.g., mine site).

**GRSG-WS-GL-001-Guideline** – In important habitat management areas, new wind energy utility-scale and/or commercial development should be restricted. If development cannot be restricted due to existing authorized use, adjacent developments, or split estate issues, then ensure that stipulations are incorporated into the authorization to protect greater sage-grouse and their habitats.

## Greater Sage-grouse Habitat

**GRSG-GRSGH-O-001-Objective** – Every 10 years for the next 50 years, improve greater sage-grouse habitat by removing invading conifers and other undesirable species in the number of acres shown in table 2.

**Table 2. Treatment Acres per Decade.**

FOREST	ACRES		
	MECHANICAL <sup>1</sup>	PRESCRIBED FIRE <sup>2</sup>	GRASS RESTORATION <sup>3</sup>
Boise	1000	2000	0
Caribou-Targhee-Curlew	3000	2000	3000
Salmon-Challis	5000	1000	0
Sawtooth	7000	1000	7000
Beaverhead-Deerlodge	0	0	0

<sup>1</sup>Removal of conifers that have invaded sagebrush including phase one juniper that is 10% or less and reducing sagebrush cover in areas over 30% canopy cover

<sup>2</sup>Acres are those that are greater than 30% sagebrush canopy cover and/or invaded by 10% or greater conifer.

<sup>3</sup>Acres presently dominated by annual grasses that could be improved by herbicide application and seeding of perennial vegetation.

**GRSG-GRSGH-ST-001-Standard** – Design habitat restoration projects to move towards desired conditions (table 1) and incorporate the concepts outlined in Appendix X - *Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.*

**GRSG-GRSGH-GL-001-Guideline** – Sagebrush removal in greater sage-grouse breeding and nesting and wintering habitats should be restricted unless necessary to support attainment of desired habitat conditions (table 1).

**GRSG-GRSGH-GL-002-Guideline** – When removing conifers that are encroaching into greater sage-grouse habitat, avoid persistent woodlands (old growth relative to the site or more than 100 years old).

**GRSG-GRSGH-GL-003-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, actions and authorizations should be designed to limit the spread and effect of non-native plant species.

**GRSG-GRSGH-GL-004-Guideline** - To facilitate safe and effective fire management actions, in priority, sagebrush focal, important, and general habitat management areas, fuels treatments should be designed to reduce the spread and intensity of wildfire in high-risk areas (i.e., areas of increased potential for ignition and in areas where there is a potential for wildfire that would be difficult for suppression resources to contain and control).

**GRSG-GRSGH-GL-005-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, native plant species should be used, when possible, to restore, enhance, or maintain desired habitat conditions (table 1).

**GRSG-GRSGH-GL-006-Guideline** – In priority, sagebrush focal, and important habitat management areas, vegetation treatment projects should only be conducted if they restore, enhance, or maintain desired habitat conditions (table 1).

## Livestock Grazing

**GRSG-LG-DC-001-Desired Condition** – In priority, sagebrush focal, and important habitat management areas, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetative attributes (table 1).

**GRSG-LG-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize construction of water developments unless beneficial to greater sage-grouse habitat.

**GRSG-LG-GL-001-Guideline** - Grazing guidelines should be applied in each of the seasonal habitats in table 3. If values in table 3 guidelines cannot be achieved based upon a site-specific analysis using Ecological Site Descriptions, long-term ecological site capability analysis, or other similar analysis, adjust grazing management to move towards desired habitat conditions in table 1 consistent with the ecological site capability. Do not use drought and degraded habitat condition to adjust values. Grazing guidelines in table 3 would not apply to isolated parcels of National Forest System lands that have less than 200 acres of greater sage-grouse habitat.

**Table 3. Grazing Guidelines for Greater Sage-grouse Seasonal Habitat.**

Seasonal Habitat	Grazing Guidelines
Breeding and nesting <sup>1</sup> within 6.2 miles of occupied leks	Perennial grass height: <sup>2</sup> When grazing occurs during breeding and nesting season (March 1 to June 15) manage for upland perennial grass height of 7 inches <sup>3,4,5</sup> When grazing occurs post breeding and nesting season (June 16 to October 30) manage for 4 inches <sup>4,5,6</sup> of perennial grass height.
Brood rearing and summer <sup>1</sup>	Retain an average stubble height of 4 inches for herbaceous riparian/mesic meadow vegetation <sup>7,8</sup>
Winter <sup>1</sup>	≤35% use of sagebrush

<sup>1</sup> For descriptions of Seasonal Habitat and Seasonal Periods of greater sage-grouse see table 1.

<sup>2</sup> Grass heights only apply in breeding and nesting habitat with ≥10% sagebrush cover to support nesting.

<sup>3</sup> Holloran et al. 2005. *Greater sage-grouse nesting habitat selection and success in Wyoming*.

<sup>4</sup> Average droop height, assuming current vegetation composition has the capability to achieve these heights. Heights will be measured at the end of the nesting period (Connelly, 2000).

<sup>5</sup> Hagen C., J.W. Connelly, and M.A. Schroeder. 2007. *A meta-analysis of greater sage-grouse *Centrocercus urophasianus* nesting and brood-rearing habitats*. *Wildlife Biology* 13(1): 42-50.

<sup>6</sup> Stubble height to be measured at the end of the growing season.

<sup>7</sup> Crawford et al. 2004. Ecology and Management of sage-grouse and sage-grouse habitat. "In riparian brood-rearing habitat, sage-grouse prefer the lower vegetation (5-15 cm (2-6 in) vs. 30-50 cm (12-20 in); Oakleaf 1971, Neel 1980, Klebenow 1982, Evans 1986) and succulent forb growth stimulated by moderate livestock grazing (Neel 1980, Evans 1986). "Moderate use equates to a 10-cm residual stubble height for most grasses and sedges."

<sup>8</sup> Stubble height to be measured in the meadow areas used by greater sage-grouse for brood-rearing (not on the hydric greenline).

**GRSG-LG-GL-002-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (table 1).

**GRSG-LG-GL-003-Guideline** – Bedding sheep and placing camps within 1.2 miles from the perimeter of a lek during lekking (March 1 to April 30) should be restricted.

**GRSG-LG-GL-004-Guideline** – During breeding and nesting season (March 1 to June 15), trailing livestock through breeding and nesting habitat should be minimized. Specific routes should be identified, existing trails should be used, and stopovers on active leks should be restricted.

**GRSG-LG-GL-005-Guideline** – Fences should not be constructed or reconstructed within 1.2 miles from the perimeter of occupied leks, unless the collision risk can be mitigated through design features or markings (e.g., mark, laydown fences, and design).

**GRSG-LG-GL-006-Guideline** – New permanent livestock facilities (e.g., windmills, corrals) should not be constructed within 1.2 miles from the perimeter of occupied leks.

## Fire Management

**GRSG-FM-ST-001-Standard** – In priority, sagebrush focal, important, and general habitat management areas, do not use prescribed fire, except for pile burning, in 12-inch or less precipitation zones unless necessary to facilitate site preparation for restoration of greater sage-grouse habitat consistent with desired conditions in table 1.

**GRSG-FM-ST-002-Standard** – In priority, sagebrush focal, and general management areas, if it is necessary to use prescribed fire to facilitate site preparation for restoration of greater sage-grouse habitat consistent with desired conditions in table 1, the associated NEPA analysis must identify how greater sage-grouse desired conditions would

be met, why alternative techniques were not selected, and how potential threats to greater sage-grouse habitat would be minimized.

**GRSG-FM-GL-001-Guideline** – In wintering or breeding and nesting habitat, sagebrush removal or manipulation, including prescribed fire, should be restricted unless the removal strategically reduces the potential impacts from wildfire.

**GRSG-FM-GL-002-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, when reseeding in fuel breaks, fire resistant native plant species should be used if available, or consider using fire resistant non-native to meet resource objectives.

**GRSG-FM-GL-003-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, treatments should be designed to restore, enhance, or maintain greater sage-grouse habitat.

**GRSG-FM-GL-004-Guideline** – Locating temporary wildfire suppression facilities (e.g., incident command posts, spike camps, helibases, mobile retardant plants) in priority, sagebrush focal, and general habitat management areas should be restricted.

**GRSG-FM-GL-005-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, cross-country vehicle travel during fire operations should be restricted whenever safe and practical to do so, as determined by fireline leadership, incident commanders, etc.

**GRSG-FM-GL-006-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, burnout operation areas should be avoided by constructing direct fire lines, whenever safe and practical to do so, to improve suppression effectiveness and minimize loss of existing sagebrush habitat as determined by fireline leadership, incident commanders, etc.

**GRSG-FM-GL-007-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, prescribed fire prescriptions should minimize undesirable effects on vegetation and/or soils (e.g., minimize mortality of desirable perennial plant species and reduce risk of hydrophobicity).

**GRSG-FM-GL-008-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, roads and natural fuel breaks should be incorporated into fuel break design to improve effectiveness and minimize loss of existing sagebrush habitat.

**GRSG-FM-GL-009-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, all fire associated vehicles and equipment should be power-washed before entering and exiting the area to minimize the introduction of undesirable invasive plant species.

**GRSG-FM-GL-010-Guideline** - Unit-specific greater sage-grouse fire management toolboxes containing maps, lists, contact information for qualified resource advisors, local guidance, and relevant information should be developed.

**GRSG-FM-GL-011-Guideline** – Localized maps of priority, sagebrush focal, important, and general habitat management areas should be provided to dispatch offices and extended attack incident commanders to use when prioritizing wildfire suppression resources and designing suppression tactics.

**GRSG-FM-GL-012-Guideline** - In or near priority, sagebrush focal, important, and general habitat management areas, a greater sage-grouse resource advisor should be assigned to all extended attack fires.

**GRSG-FM-GL-013-Guideline** – On critical fire weather days, available fire suppression resources should be pre-positioned to optimize a quick and efficient response into priority, sagebrush focal, important, and general habitat management areas.

**GRSG-FM-GL-014-Guideline** - During periods of multiple fires, line officers should be involved in setting priorities to help protect priority, sagebrush focal, important, and general habitat management areas.

**GRSG-FM-GL-015-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, consider using fire retardant and mechanized equipment only if it is likely to result in minimizing burned acreage.

**GRSG-FM-GL-016-Guideline** – In priority, important and general habitat management areas, to minimize sagebrush loss, mop-up should be conducted where the burned areas adjoin unburned islands, doglegs, or other habitat features, as safety and available resources allows.

## Wild Horse and Burro

**GRSG-HB-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, wild horse and burro populations should be managed within established appropriate management levels to restore, enhance, or maintain greater sage-grouse desired habitat conditions (table 1).

**GRSG-HB-GL-002-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, appropriate management levels should be adjusted if greater sage-grouse management standards are not met due to degradation that can be at least partially attributed to wild horse or burro populations.

## Recreation

**GRSG-R-DC-001-Desired Condition** – In priority, sagebrush focal, important, and general habitat management areas, existing and new recreation special use authorizations and expansion of special use authorizations restrict effects to greater sage-grouse and their habitats.

**GRSG-R-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize temporary recreation uses (i.e., facilities or activities) that result in loss of habitat or would have long-term (greater than 5 years) negative impacts on greater sage-grouse or their habitats.

**GRSG-R-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, terms and conditions that protect and/or restore greater sage-grouse habitat within the permit area should be included in new recreation special use authorizations. During renewal, amendment, or reauthorization, terms and conditions in existing permits and operating plans should be modified to protect and/or restore greater sage-grouse habitat.

**GRSG-R-GL-002-Guideline** – In priority, sagebrush focal, and important habitat management area, new recreational facilities or expansion of existing recreational facilities (e.g., roads, trails, campgrounds), including special use authorizations for facilities and activities, should not be approved unless the development results in a net conservation gain to greater sage-grouse and/or their habitats or the development is required for visitor safety.

## Roads/Transportation

**GRSG-RT-DC-001-Desired Condition** - In priority, sagebrush focal, important, and general habitat management areas, within the travel management system, greater sage-grouse experience minimal disturbance during breeding and nesting (March 1 to June 15) and wintering periods (November 1 to February 28).

**GRSG-RT-ST-001-Standard** – In priority, sagebrush focal, important, and general habitat management areas, do not construct or allow new road or trail construction (does not apply to realignments for resource protection) except when necessary for administrative access, public safety, or to access valid existing rights. If necessary to construct new roads and trails for one of these purposes, construct them to the minimum standard, length, and number and avoid, minimize, and mitigate impacts

**GRSG-RT-ST-002-Standard** – Do not conduct or allow road and trail maintenance activities within 2 miles from the perimeter of active leks during lekking (March 1 to April 30) from 6 pm to 9 am.

**GRSG-RT-ST-003-Standard** – In priority, sagebrush focal, and important habitat management areas, do not grant public access on temporary energy development roads, unless consistent with all other terms and conditions included in the land use management plan.

**GRSG-RT-GL-001-Guideline** – In priority, sagebrush focal, and important habitat management areas, new roads and road realignments should be designed and administered to reduce collisions with greater sage-grouse.

**GRSG-RT-GL-002-Guideline** – In priority, sagebrush focal, and important habitat management areas, road construction within riparian areas and mesic meadows should be restricted. If not possible to restrict construction within riparian areas and mesic meadows, roads should be designed and constructed at right angles to ephemeral drainages and stream crossings, unless topography prevents doing so.

**GRSG-RT-GL-003-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, when decommissioning roads and unauthorized routes, restoration activity should be designed to move habitat towards desired conditions (table 1).

**GRSG-RT-GL-004-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, dust abatement terms and conditions should be included in road use permits when dust has the potential to impact greater sage-grouse.

**GRSG-RT-GL-005-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, road and road-way maintenance activities should be designed and implemented to reduce the risk of vehicle or human-caused wildfires and the spread of invasive plants.



## Minerals

### Fluid Minerals – Unleased

**GRSG-M-FMUL-ST-001-Standard** - In priority, sagebrush focal, and important habitat management areas, any new oil and gas leases must include a no surface occupancy stipulation. There will be no waivers, exceptions, or modifications. An exception could be granted by the authorized officer with unanimous concurrence from a team of agency greater sage-grouse experts from the Fish and Wildlife Service, Forest Service, and State wildlife agency if:

- There would be no direct, indirect, or cumulative effects to greater sage-grouse or their habitats or
- Granting the exception provides an alternative to a similar action occurring on a nearby parcel and
- The exception provides a clear net conservation gain to greater sage-grouse.

**GRSG-M-FMUL-ST-002-Standard** – In general habitat management areas, any new leases must include appropriate controlled surface use and timing limitation stipulations to protect greater sage-grouse and their habitat.

**GRSG-M-FMUL-ST-003-Standard** – In sagebrush focal habitat management areas, there will be no surface occupancy and no waivers, exceptions, or modifications for fluid mineral leasing.

**GRSG-M-FMUL-ST-004-Standard** – In priority, sagebrush focal, and general management areas, when analyzing leasing of fluid mineral resources, prioritize development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse, subject to valid existing rights, law, and regulations.

### Fluid Minerals – Leased

**GRSG-M-FML-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, when approving the Surface Use Plan of Operation portion of the Application for Permit to Drill on existing leases that are not yet developed, require that leaseholders avoid and minimize surface disturbing and disruptive activities consistent with the rights and conditions granted in the lease.

**GRSG-M-FML-ST-002-Standard** – In priority, sagebrush focal, and important habitat management areas, when facilities are no longer needed or leases are relinquished, require reclamation plans to include terms and conditions to restore habitat to desired conditions as described in table 1.

**GRSG-M-FML-ST-003-Standard** – In general habitat management areas, authorize new transmission line corridors, transmission line right-of-ways, transmission line construction, or transmission line-facility construction associated with fluid mineral leases with stipulations necessary to protect greater sage-grouse and their habitats, consistent with the terms and conditions of the permit.

**GRSG-M-FML-ST-004-Standard** – Locate compressor stations on portions of a lease that are non-habitat and are not used by greater sage-grouse, and if there would be no direct, indirect, or cumulative effects on sage-grouse or their habitat. If this is not possible, work with the operator to use mufflers, sound insulation, or other features to reduce noise.

**GRSG-M-FML-ST-005-Standard** – In priority, sagebrush focal, and general management areas, when authorizing development of fluid mineral resources, prioritize development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse, subject to valid existing rights, law, and regulations

**GRSG-M-FML-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, operators should be encouraged to reduce disturbance to greater sage-grouse habitat. At the time of approval of the Surface Use Plan of Operation portion of the Application for Permit to Drill, terms and conditions should be included to reduce disturbance to greater sage-grouse habitat, where appropriate and feasible and consistent with the rights granted to the lessee.

**GRSG-M-FML-GL-002-Guideline** – On Federal leases in priority, sagebrush focal, and important habitat management areas, when surface occupancy cannot be restricted due to valid existing rights or development requirements, disturbance and surface occupancy should be limited to areas least harmful to greater sage-grouse based on vegetation, topography, or other habitat features.

**GRSG-M-FML-GL-003-Guideline** - In priority, sagebrush focal, and general management areas, where the federal government owns the surface and the mineral estate is in non-federal ownership, coordinate with the mineral estate owner/lessee to apply appropriate stipulations, conditions of approval, conservation measures and required design features to the appropriate surface management instruments to the maximum extent permissible under existing authorities.

## Fluid Minerals – Operations

**GRSG-M-FMO-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize employee camps.

**GRSG-M-FMO-ST-002-Standard** – In priority, sagebrush focal, and important habitat management areas, when feasible, do not locate tanks or other structures that may be used as raptor perches. If this is not feasible, use perch deterrents.

**GRSG-M-FMO-GL-001-Guideline** – In priority, sagebrush focal, and important habitat management areas, closed-loop systems should be used for drilling operations with no reserve pits, where feasible.

**GRSG-M-FMO-GL-002-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, during drilling operations, soil compaction should be reduced and soil structure should be maintained using the best available techniques to improve vegetation reestablishment.

**GRSG-M-FMO-GL-003-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, dams, impoundments and ponds for mineral development should be constructed to reduce potential for West Nile virus. Examples of methods to accomplish this include:

- Increase the depth of ponds to accommodate a greater volume of water than is discharged.
- Build steep shorelines (greater than 2 feet) to reduce shallow water and aquatic vegetation around the perimeter of impoundments to reduce breeding habitat for mosquitoes.
- Maintain the water level below that of rooted aquatic and upland vegetation. Restrict flooding terrestrial vegetation in flat terrain or low-lying areas.
- Construct dams or impoundments that restrict down-slope seepage or overflow by digging ponds in flat areas rather than damming natural draws for effluent water storage or lining constructed ponds in areas where seepage is anticipated.
- Line the channel where discharge water flows into the pond with crushed rock or use a horizontal pipe to discharge inflow directly into existing open water.

- Line the overflow spillway with crushed rock and construct the spillway with steep sides.
- Fence pond sites to restrict access by livestock and other wild ungulates.
- Remove or re-inject produced water.
- Treat waters with larvicides to reduce mosquito production where water occurs on the surface.

**GRSG-M-FMO-GL-004-Guideline** – In priority, sagebrush focal, important, and general habitat management areas to keep habitat disturbance at a minimum, a phased development approach should be applied to fluid mineral operations, wherever possible, consistent with the rights granted under the lease. Disturbed areas should be reclaimed as soon as they are no longer needed for mineral operations.

### Coal Mines - Unleased

**GRSG-M-CMUL-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize surface disturbances (e.g., appurtenant facilities) for new underground coalmines.

### Coal Mines – Leased

**GRSG-M-CML-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, do not authorize new appurtenant facilities for existing underground mines unless no technically feasible alternative exists. If new appurtenant facilities associated with existing mine leases cannot be located outside of priority, sagebrush focal, and important habitat management areas, co-locate them with any existing disturbed areas, if possible. If co-location is not possible, then construct new facilities to minimize disturbed areas while meeting mine safety standards and requirements, as identified by MSHA mine-plan approval process, and locate the facilities in an area least harmful to greater sage-grouse habitats based on vegetation, topography, or other habitat features.

**GRSG-M-CML-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, when coal leases are subject to readjustment, additional requirements should be included in the readjusted lease to protect and reduce threats to greater sage-grouse and their habitats to conserve, enhance, and restore habitat for long-term viability.

### Locatable Minerals

**GRSG-M-LM-ST-001-Standard** – In priority, sagebrush focal, and important habitat management areas, approve Plans of Operation with mitigation to protect greater sage-grouse and their habitats, consistent with the rights of the mining claimant as granted by the General Mining Act of 1872, as amended.

**GRSG-M-LM-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas to keep habitat disturbance at a minimum, a phased development approach should be applied to operations consistent with the rights granted under the General Mining Act of 1872, as amended. Disturbed areas should be reclaimed as soon as they are no longer needed for mineral operations.

**GRSG-M-LM-GL-002-Guideline** - In priority, sagebrush focal, important, and general habitat management areas, abandoned mine sites should be closed or mitigated, subject to valid or existing rights, to reduce predation of greater sage-grouse by eliminating tall structures that could provide nesting opportunities and perching sites for predators.

## Non-energy Leasable Minerals

**GRSG-M-NEL-GL-001-Guideline** – In priority, sagebrush focal, important, and general habitat management areas, at the time of issuance of prospecting permits, exploration licenses and leases, or readjustment of leases, the Forest Service should provide recommendations to the Bureau of Land Management for the protection of greater sage-grouse and their habitats.

**GRSG-M-NEL-GL-002-Guideline** - In priority, sagebrush focal, and general habitat management areas, the Forest Service should recommend to the Bureau of Land Management that expansion or readjustment of existing leases avoid, minimize, or mitigate the effects to greater sage-grouse and their habitat

## Mineral Materials

**GRSG-M-MM-ST-001-Standard** – In priority and sagebrush focal management areas, do not allow new mineral material disposal or development.

**GRSG-M-MM-ST-002-Standard** – In priority, sagebrush focal, and important habitat management areas, free-use mineral material collection permits may be issued and expansion of existing active pits may be allowed, except from March 1 to April 30 between 6 pm and 9 am within 2 miles from the perimeter of occupied leks, if doing so is within the Biologically Significant Unit and does not exceed the disturbance cap.

**GRSG-M-MM-ST-003-Standard** - In priority, sagebrush focal, important, and general habitat management areas, any permit for existing mineral material operations must include appropriate requirements for operation and reclamation of the site to restore or maintain desired habitat conditions (table 1).

## Glossary of Terms as Used in this Plan

**Active lek** - Any lek that has been attended by male greater sage-grouse during the most recent strutting season.

**Adjacent** – Installation of new linear improvements parallel, near, or next to existing linear improvements.

**Administrative access** - Access for resource management and administrative purposes such as fire suppression, cadastral surveys, permit compliance, law enforcement, and military in the performance of their official duty, or other access needed to manage National Forest System lands or uses.

**Allotment management plan** - A written program of livestock grazing management, including supportive measures, if required, designed to attain specific, multiple-use management goals in a grazing allotment. The Plan is prepared in consultation with the permittee(s), lessee(s), and other affected interests. Livestock grazing is considered in relation to other uses of the range and to renewable resources, such as watershed, vegetation, and wildlife. The Plan establishes seasons of use, the number of livestock to be permitted, the range improvements needed, and the grazing system.

**Ambient (noise level)** - Sometimes called background noise level, reference sound level, or room noise level is the background sound pressure level at a given location, normally specified as a reference level to study a new intrusive sound source.

**Anthropogenic disturbances** – Human-created features include but are not limited to paved highways, graded gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and associated facilities, pipelines, landfills, agricultural conversion, homes, and mines.

**Appurtenant (minerals)** - A piece of equipment (e.g., pump jack, separator, storage tank, compressor station, metering equipment) necessary for production.

**Authorized uses** - An activity (i.e., resource use) occurring on the public lands that is either explicitly or implicitly recognized and legalized by law or regulation. The term may refer to activities occurring on the public lands for which the Forest Service has issued a formal authorization document (e.g., livestock grazing permit, special use authorization, approved plan of operation, etc.). Formal authorized uses can involve both commercial and noncommercial activity, facility placement, or event. These authorized uses are often spatially or temporally limited. Unless constrained or bounded by statute, regulation, or an approved land use plan decision, legal activities involving public enjoyment and use of the public lands (e.g., hiking, camping, hunting, etc.) require no formal Forest Service authorization.

**Biologically significant unit** - A geographical/spatial area within greater sage-grouse habitat that contains relevant and important habitats that is used as the basis for comparative calculations to support evaluation of changes to habitat. A biologically significant unit or subset of the unit is used in the calculation of the anthropogenic disturbance threshold and in the adaptive management habitat trigger.

The biologically significant unit is defined as:

- Idaho: All of the modeled nesting and delineated winter habitat, based on 2012 data, within priority and/or important habitat management areas within a Conservation Area.
- Montana: All of the priority and sagebrush focal management areas.

**Co-locate** - Installation of new linear improvements in or on existing linear improvements.

**Communication tower site** - Sites that include broadcast types of uses (e.g., television, AM/FM radio, cable television, broadcast translator) and non-broadcast uses (e.g., commercial or private mobile radio service, cellular telephone, microwave, local exchange network, passive reflector).

**Compensatory mitigation** – Compensating for the residual impact of a certain action or parts of an action by replacing or providing substitute resources or environments(s).

**Compensatory mitigation projects** – The restoration, creation, enhancement, and/or preservation of impacted resources, such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements)

**Conservation area** - Areas determined to be necessary to monitor population objectives to evaluate the disturbance density and adaptive regulatory triggers and engage adaptive management responses. Conservation Areas may contain priority, sagebrush focal, important, and general habitat management areas. Specifically, these areas are Mountain Valleys, Desert, West Owyhee, and Southern and Southwestern Montana.

**Disruptive activities** - Land resource uses/activities that are likely to alter the behavior, displace, or cause excessive stress to greater sage-grouse populations occurring at a specific location and/or time. Actions that alter behavior or cause the displacement of individuals such that reproductive success is negatively affected, or an individual's physiological ability to cope with environmental stress is compromised.

**Distribution line** - An electrical utility line with a capacity of less than 100kV or a natural gas, hydrogen, or water pipeline less than 24" in diameter.

**Diversity (species)** – The number, distribution, and geographic ranges of plant and animal species including focal species and species-at-risk.

**Durable (protective and ecological)** - The administrative, legal, and financial assurances that secure and protect the conservation status of a compensatory mitigation site, and the ecological benefits of a compensatory mitigation project, for at least as long as the associated impacts persist.

**Enhance** - The improvement of habitat by increasing missing or modifying unsatisfactory components and/or attributes of the habitat (e.g., road commissioning) to meet greater sage-grouse objectives.

**Exception (minerals)** - A case-by-case exemption from a lease stipulation. The stipulation continues to apply to all other sites within the leasehold to which the restrictive criteria apply. The authorized officer (any employee of the Forest Service to whom has been delegated the authority to perform the duties described in the applicable Forest Service manual or handbook) may grant an exception if an environmental record of review determines that the action, as proposed or conditioned, would not impair the function or utility of the site for the current or subsequent seasonal habitat, life-history, or behavioral needs of greater sage-grouse.

**Feasible** – see technically/economically feasible.

**Fluid minerals** - Oil, gas, coal bed natural gas, and geothermal resources.

**General habitat management areas** - Areas identified by the Forest Service, in coordination with respective state wildlife agencies, as those areas outside of priority and sagebrush focal management areas and occupied by greater sage-grouse seasonally or year-round.

**Grazing system** - Scheduled grazing use and non-use of an allotment to reach identified goals or objectives by improving the quality and quantity of vegetation. Include, but are not limited to, developing pastures, utilization levels, grazing rotations, timing and duration of use periods, and necessary range improvements.

**Habitat** - An environment that meets a specific set of physical, biological, temporal, or spatial characteristics that satisfy the requirements of a plant or animal species or group of species for part or all of their life cycle.

**Hard triggers** - Thresholds indicating that immediate action is necessary to stop a severe deviation from sage grouse conservation objectives set forth in the land and resources management plan.

**High-voltage transmission line** – An electrical power line that is 100 kilovolts or larger.

**Holder** – An individual or entity that holds a valid special use authorization.

**Impact** - The effect, influence, alteration, or imprint caused by an action.

**Important habitat management areas** - High value habitat and populations that provide a management buffer for the priority and sagebrush focal management areas and connect patches of priority and sagebrush focal management areas. The areas encompass areas of generally moderate to high conservation value habitat and/or populations and, in some conservation areas, include areas beyond those identified by USFWS as necessary to maintain redundant, representative, and resilient populations. The areas are typically adjacent to priority and sagebrush focal management areas but generally reflect somewhat lower greater sage-grouse population status and/or reduced habitat value due to disturbance, habitat fragmentation, or other factors. No important habitat management areas are designated within the southwestern Montana conservation area.

**Indicators** - Factors that describe resource condition and change and can help the BLM and the Forest Service determine trends over time.

**Isolated parcel** - An individual parcel of land that may share a corner, but does not have a common border with another parcel.

**Invasive species (invasives plant species, invasives)** - An alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health. The species must cause, or be likely to cause, harm, and be exotic to the ecosystem it has infested before considered invasive.

**Landscape** – A distinct association of land types that exhibit a unique combination of local climate, landform, topography, geomorphic process, surficial geology, soil, biota, and human influences. Landscapes are generally of a size that the eye can comprehend in a single view.

**Lease** – A type of special use authorization (usually granted for uses other than linear rights-of-way) that is used when substantial capital investment is required and when conveyance of a conditional and transferable interest in National Forest System lands is necessary or desirable to serve or facilitate authorized long-term uses, and that may be revocable and compensable according to its terms.

**Leasable minerals** - Those minerals or materials designated as leasable under the Mineral Leasing Act of 1920. These include energy-related mineral resources such as oil, natural gas, coal, and geothermal, and some non-energy minerals, such as phosphate, sodium, potassium, and sulfur. Geothermal resources are also leasable under the Geothermal Steam Act of 1970.

**Lessee** - A person or entity authorized to use and occupy National Forest System land under a specific instrument identified as a lease. Forest special use leases are limited to authorize certain wireless communication uses. Leases are also used for certain mineral leasable activities.

**Lek** - A courtship display area attended by male greater sage-grouse in or adjacent to sagebrush dominated habitat. For management purposes, leks with less than five males observed strutting should be confirmed active for 2 years to meet the definition of a lek (Connelly et al 2000, Connelly et al. 2003, 2004).

**Locatable minerals** - Mineral disposable under the General Mining Act of 1872, as amended, that was not excepted in later legislation. They include hardrock, placer, industrial minerals, and uncommon varieties of rock found on public domain lands.

**Major pipeline** – A pipeline that is 24 inches or more in outside-pipe diameter (Mineral Leasing Act of 1920 30 U.S.C. § 181; 36 CFR 251.54(f)(1)).

**Mineral** - Any naturally formed inorganic material, solid or fluid inorganic substance that can be extracted from the earth, any of various naturally occurring homogeneous substances (as stone, coal, salt, sulfur, sand, petroleum, water, or natural gas) obtained usually from the ground. Under Federal laws, considered as locatable (subject to the general mining laws), leasable (subject to the Mineral Leasing Act of 1920), and salable (subject to the Materials Act of 1947).

**Mineral materials** - Common varieties of mineral materials such as soil, sand and gravel, stone, pumice, pumicite, and clay that are not obtainable under the mining or leasing laws but that can be acquired under the Materials Act of 1947, as amended.

**Minimization mitigation** - Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

**Mitigation** - Includes specific means, measures, or practices that could reduce, avoid, or eliminate adverse impacts. Mitigation can include avoiding the impact altogether by not taking a certain action or parts of an action, minimizing the impact by limiting the degree of magnitude of the action and its implementation, rectifying the impact by repairing, rehabilitation, or restoring the affected environment, reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action, and compensating for the impact by replacing or providing substitute resources or environments.

**Modification (oil and gas)** - A fundamental change to the provisions of a lease stipulation, either temporarily or for the term of the lease. A modification may include an exemption from or alteration to a stipulated requirement. Depending on the specific modification, the stipulation may or may not apply to all other sites within the leasehold to which the restrictive criteria applied.



**Native plant species** - Species that were found here before European settlement, and consequently are in balance with these ecosystems because they have well developed parasites, predators, and pollinators.

**No surface occupancy (NSO)** - Use or occupancy of the land surface for fluid mineral exploration or development prohibited to protect identified resource values. The NSO stipulation includes stipulations that may be worded as “No Surface Use/Occupancy,” “No Surface Disturbance,” “Conditional NSO,” or “Surface Disturbance or Surface Occupancy Restriction (by location).”

**Occupied Lek** - A lek that has been active during at least one strutting season within the prior 10 years.

**Opportunity (allotment closure)** - A suitable or favorable time to abolish or close an allotment because of nonuse violations, term permit waivers where the permit is waived back to the government, resource protection, or permit actions resulting in cancellation of the permit.

**Permit** — A special use authorization that provides permission, without conveying an interest in land, to occupy and use National Forest System land or facilities for specified purposes, and which is both revocable and terminable.

**Persistent woodlands** – Long-lived pinyon-juniper woodlands that typically have sparse understories and occur on poor substrates in the assessment area.

**Plan of Operation** - A Plan of Operation is required for all mining activity conducted under the General Mining Act of 1872, as amended, if the proposed operations will likely cause significant disturbance of surface resources. The Plan of Operation describes the type of operations proposed and how they would be conducted, the type and standard of existing and proposed roads or access routes, the means of transportation to be used, the period during which the proposed activity will take place, and measures to be taken to meet the requirements for environmental protection (36 CR 228.4).

**Prescribed fire** - Any fire ignited by management actions to meet specific objectives. A written, approved prescribed fire plan must exist and NEPA requirements, where applicable, must be met before ignition.

**Priority management areas** - Areas identified by the Forest Service, in coordination with respective state wildlife agencies, as having the highest conservation value to maintaining sustainable greater sage-grouse populations. These areas include breeding, late brood-rearing and winter concentration areas.

**Reclamation plans** – Plans that guide the suite of actions taken within an area affected by human disturbance, the outcome of which is intended to change the condition of the disturbed area to meet pre-determined objectives and/or make it acceptable for certain defined resources (e.g., wildlife habitat, grazing, ecosystem function, etc.).

**Residual impacts** - Impacts from an implementation-level decision that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Restoration** - Implementation of a set of actions that promotes plant community diversity and structure that allows plant communities to be more resilient to disturbance and invasive species over the long term. The long-term goal is to create functional, high quality habitat that is occupied by greater sage-grouse. Short-term goal may be to restore the landform, soils and hydrology and increase the percentage of preferred vegetation, seeding of desired species, or treatment of undesired species.

**Right-of-way** - Land authorized to be used or occupied for the construction, operation, maintenance, and termination of a project or facility passing over, upon, under or through such land.

**Road or trail** - A road or trail wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the National Forest System and the use and development of its resources.

**Sagebrush focal areas** – A subset of priority greater sage-grouse habitat, as identified by the U.S. Fish and Wildlife Service, which are considered most vital to the species persistence and therefore, have the strongest levels of protection.

**Soft triggers** - An intermediate threshold indicating that management changes are needed at the implementation level to address habitat or population losses.

**Special use authorization** - A written permit, term permit, lease, or easement that authorizes use or occupancy of National Forest System lands and specifies the terms and conditions under which the use or occupancy may occur.

**Stipulation (general)** - A term or condition in an agreement, contract, or written authorization.

**Stipulation (oil and gas)** - A provision that modifies standard oil and gas lease terms and conditions in order to protect other resource values or land uses and is attached to and made a part of the lease.

**Soft trigger** - An intermediate threshold indicating that management changes are needed at the implementation level to address habitat or population losses.

**Surface disturbing and disruptive activities** - Actions that alter the vegetation, surface/near surface soil resources, and/or surface geologic features, beyond natural site conditions and on a scale that affects other public land values. Examples of surface disturbing activities may include operation of heavy equipment to construct well pads, roads, pits and reservoirs; installation of pipelines and power lines; and the conduct of several types of vegetation treatments (e.g., prescribed fire, etc.). Surface disturbing activities may be either authorized or prohibited

**Surface use** - Activities that may be present on the surface or near-surface (e.g., pipelines) of public lands. When administered as a use restriction (e.g., no surface occupancy), this phrase prohibits all but specified resource uses and activities in a certain area to protect particular sensitive resource values and property. This designation typically applies to small acreage sensitive resource sites (e.g., plant community study enclosure, etc.), and/or administrative sites (e.g., government ware-yard, etc.) where only authorized, agency personnel are admitted.

**Tall structures** - A wide array of infrastructures (e.g., poles that support lights, telephone and electrical distribution, communication towers, meteorological towers, high-tension transmission towers, and wind turbines) that have the potential to disrupt lekking or nesting birds by creating new perching/nesting opportunities and/or decreasing the use of an area. A determination as to whether something is considered a tall structure would be based on local conditions such as vegetation or topography.

**Technically/economically feasible** - Actions that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant. It is the Forest Service's sole responsibility to determine what actions are technically and economically feasible. The Forest Service will consider whether implementation of the proposed action is likely given past and current practice and

technology; this consideration does not necessarily require a cost-benefit analysis or speculation about an applicant's costs and profit.

**Temporary special use permit** – A type of permit that terminates within 1 year or less after the approval date. All other provisions applicable to permits apply fully to temporary permits. Temporary special use permits are issued for seasonal or short-duration uses involving minimal improvement and investment.

**Term permit** – An authorization to occupy and use National Forest System land, other than rights-of-way for a specified period that is both revocable and compensable according to its terms.

**Timely** - The conservation benefits from compensatory mitigation accruing as early as possible or before impacts have begun.

**Transmission line** - An electrical utility line with a capacity greater than or equal to 100kV or a natural gas, hydrogen, or water pipeline greater than or equal to 24" in diameter.

**Travel management system** – Planned and authorized roads, trails, and areas for motor vehicle use on National Forest System lands that are managed in a controlled, sustained manner.

**Utility-scale and/or commercial energy development** – A project that is capable of producing 20 or more megawatts of electricity for distribution to customers through the electricity-transmission-grid system.

**Valid existing rights** - Documented, legal rights, or interests in the land, which allow a person or entity to use said land for a specific purpose and that are still in effect. Such rights include but are not limited to fee title ownership, mineral rights, and easements. Such rights may have been reserved, acquired, granted or otherwise authorized under various statutes of law.

**Vegetation treatments** - Management practices that are designed to maintain current vegetation structure or change the vegetation structure to a different stage of development. Vegetation treatment methods may include managed fire, prescribed fire, chemical, mechanical, and seeding.

**Viability** - For purposes of the National Forest Management Act and its enabling regulations, viability is the availability of habitat that allows a species to persist on landscapes for long-periods (multi-generational) of time. It assumes that populations are abundant (sufficient numbers) and well-distributed (sufficient redundancy of populations) to provide for long-term population persistence on a landscape.

**Waiver (oil and gas)** - Permanent exemption from a lease stipulation. The stipulation no longer applies anywhere within the leasehold.

**West Nile virus** - A virus that is found in temperate and tropical regions of the world and most commonly transmitted by mosquitoes. West Nile virus can cause flu-like symptoms in humans and can be lethal to birds, including greater sage-grouse.

**Wildfire suppression** - An appropriate management response to wildfire, or prescribed fire that results in curtailment of fire spread and eliminates all identified threats from the particular fire.



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Re: Information from Draft Sage Grouse EIS**

1 message

**Norred, Jonathan** <jnorred@blm.gov>

Fri, Jun 12, 2015 at 10:25 AM

To: John Peiserich &lt;jpeiserich@altamesa.net&gt;

Cc: Scott Pugrud &lt;Scott.Pugrud@oer.idaho.gov&gt;, Sean Flynn &lt;flynn17055@yahoo.com&gt;, "Karl R. Kosier" &lt;kkosier@altamesa.net&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;, Brent Ralston &lt;bralston@blm.gov&gt;

John,

The Preliminary habitat data utilized in the DRAFT EIS and posted to inside Idaho would be the two datasets in the links below. One for the Preliminary General Habitat and one for the Preliminary Priority Habitat.

Links to inside Idaho:

[Greater Sage-Grouse Preliminary General Habitat \(Version 2, April 2012\) for Idaho](#)[Greater Sage-Grouse Preliminary Priority Habitat \(Version 2, April 2012\) for Idaho](#)

These are the base habitat layers used in multiple analysis for differing alternatives within the draft. There are multiple alternatives, and multiple maps associated with those alternatives, so a more specific answer to your request would depend on more specific information related to the alternative in question and the maps and data associated with that alternative.

I have spoken with John Beck who will be returning to the office next week. I will meet with him then and determine if there are additional data associated with your specific request. If so, we will ensure we get those to you at that time, but in the interim, these are the base habitat layers posted to inside Idaho utilized in the DRAFT EIS effort.

Thank you,

jon

On Thu, Jun 11, 2015 at 3:09 PM, John Peiserich &lt;jpeiserich@altamesa.net&gt; wrote:

Mr. Norred -

As I mentioned on the telephone, we are searching for the GIS layers for the mapping associated with the Draft Sage Grouse EIS. In particular, I need the GIS layers that show the habitat designations in the Draft Sage Grouse EIS. Scott Pugrud and I met with John Beck yesterday and he indicated that you would be a good source of information regarding the GIS layer information.

Sean and Karl are my mapping experts, so I've included them in this email string. Please forward them the relevant information.

Sincerely,

**John**  
John Peiserich  
Alta Mesa Holdings, LP  
Vice President & General Counsel - AM Idaho

250 Bobwhite Ct., Suite 240  
Boise, ID 83706

Office: (208) 906-2681

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[jpeiserich@altamesa.net](mailto:jpeiserich@altamesa.net)

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**Jonathan Norred**  
**GIS Manager Idaho State Office**  
DOI - Bureau of Land Management - Idaho  
(208) 373-3961  
[jnorred@blm.gov](mailto:jnorred@blm.gov)



Beck, Jonathan <jmbeck@blm.gov>

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**FW: ACECs - Alt F**

1 message

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**Brent Ralston** <bralston@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>

Sun, Mar 29, 2015 at 8:55 PM

Brent Ralston

Special Projects Lead

Jarbridge & Owyhee Grazing Permit Process

208-373-3812

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**From:** Brent Ralston [mailto:[bralston@blm.gov](mailto:bralston@blm.gov)]  
**Sent:** Sunday, March 29, 2015 8:53 PM  
**To:** 'Meredith Zaccherio'  
**Cc:** Beck, Jonathan M  
**Subject:** RE: ACECs - Alt F

Meredith,

The Wild Earth Guardians alternative came with two, what we took to be, distinct ACEC nominations. The first was all areas identified as preliminary priority habitat. That was the easy one to delineate and includes all those BLM and Forest Service areas that contained PPH, preliminary priority habitat as described in the April 2012 refined mapping effort. These areas were also the preliminary priority areas described in Alternative B – the NTT Alternative. The second proposal was ‘a system of ACECs to protect sage-grouse’ – we took this to be a more refined delineation of the most important areas for the protection of critical sage-grouse habitats. Paul and Don initially worked with the key habitat map and other mapped seasonal habitats to delineate these areas. This was primarily areas on BLM lands since the more refined evaluation did not note any Forest Service areas meeting these criteria. We then met with each field office and district to further refine these areas and describe what habitats and values those areas provided for sage-grouse.

Both of these ACEC proposals were displayed in Alternative F as two sub-alternatives – an all PPH with both BLM and Forest Service Proposed ACECs and Zoological Areas respectively; and a system of ACECs that ended up being only BLM Proposed ACECs.

Brent Ralston

Special Projects Lead

Jarbidge & Owyhee Grazing Permit Process

208-373-3812

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**From:** Meredith Zaccherio [<mailto:meredith.zaccherio@empsi.com>]

**Sent:** Friday, March 27, 2015 10:16 AM

**To:** [bralston@blm.gov](mailto:bralston@blm.gov)

**Subject:** FW: ACECs - Alt F

Hi Brent,

Can you provide any additional clarification on the two Alternative F sub-alternatives? Diane's explanation is a decent start, but I'm curious about more detail regarding Option B.

Thanks,

Meredith

**Meredith Zaccherio**

EMPSI Environmental Management and Planning Solutions, Inc.

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**From:** Beck, Jonathan [<mailto:jmbeck@blm.gov>]  
**Sent:** Friday, March 27, 2015 6:36 AM  
**To:** Meredith Zaccherio  
**Subject:** Re: ACECs - Alt F

I hate sub-alternatives. Do you have what you need or do you want me to ping Ralston? Jon

On Thu, Mar 26, 2015 at 4:34 PM, Meredith Zaccherio <[meredith.zaccherio@emp.si.com](mailto:meredith.zaccherio@emp.si.com)> wrote:

Excellent, thanks. That will give me at least something to go by!

**Meredith Zaccherio**  
EMPSi Environmental Management and Planning Solutions, Inc.  
26 O'Farrell Street, 7th Floor  
San Francisco, CA 94108  
tel: 415-544-0440 fax: 866-698-4836  
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**From:** McConnaughey, Diane [mailto:[dmcconnaughey@blm.gov](mailto:dmcconnaughey@blm.gov)]  
**Sent:** Thursday, March 26, 2015 2:53 PM  
**To:** Meredith Zaccherio  
**Cc:** [jmbeck@blm.gov](mailto:jmbeck@blm.gov)  
**Subject:** Re: ACECs - Alt F

There is a huge difference in the areas of the ACECs in the two proposals for Alternative F. I wonder if Brent has a more complete description of these. From the metadata

Alternative F has 2 variations: A is the "all preliminary priority habitat (PPH)" variation and B is the "extensive system of proposed ACECs". Because Options A and B overlap in some places acreage calculations using the original source data will result in inflated acreages! This feature class does not have overlapping polygons within itself, and names of ACECs and Zoological Areas are correct for Option A. Option B can be thought of as a subset of Option A (it adds no new areas,) but names and labels are sometimes different than Option A.

Diane McConnaughey

GIS Analyst

BLM, Idaho State Office

1387 S. Vinnell Way

Boise, ID 83709

voice 208-373-3967

email [dmcconnaughey@blm.gov](mailto:dmcconnaughey@blm.gov)

On Thu, Mar 26, 2015 at 2:40 PM, Meredith Zaccherio <[meredith.zaccherio@emp.si.com](mailto:meredith.zaccherio@emp.si.com)> wrote:

Hi Jon and Diane,

I'm revising the description of ACECs under Alternative F in the EIS, but I don't actually know what the two sub-alternatives are! Can either of you explain them to me? In the DEIS, this is the description that we had, though the acres in the updated Table 2-2 show a fairly large difference between F1 and F2:

"Under Alternative F, BLM would designate 17 or 18 new ACECs and the Forest Service would designate 12 new Zoological Areas."

On the maps in the ACEC appendix, it appears that one designates all PPH as an ACEC, and the other has fewer acres as ACECs, but I did not see 12 Zoological Areas listed in the key.

Thoughts?

Thanks,

Meredith

**Meredith Zaccherio**

EMPSi Environmental Management and Planning Solutions, Inc.

26 O'Farrell Street, 7th Floor

San Francisco, CA 94108

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[www.EMPSi.com](http://www.EMPSi.com)

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—  
Jonathan Beck

Bureau of Land Management

Idaho State Office

208-373-4070





Beck, Jonathan &lt;jmbeck@blm.gov&gt;

---

**RE: one pager on imp strat**

1 message

Brent Ralston &lt;bralston@blm.gov&gt;

Tue, Mar 10, 2015 at 12:55 PM

To: Jonathan Beck &lt;jmbeck@blm.gov&gt;, Johanna Munson &lt;jmunson@blm.gov&gt;, Kurt Wiedenmann &lt;kwiedenmann@blm.gov&gt;

Jon,

Here is the coordination flow chart and associated description. This is for inclusion in the Final EIS but also may have some use for the DSD meeting this week.

Brent Ralston

Special Projects Lead

Jarbidge &amp; Owyhee Grazing Permit Process

208-373-3812

From: Beck, Jonathan [mailto:[jmbeck@blm.gov](mailto:jmbeck@blm.gov)]

Sent: Monday, March 09, 2015 2:23 PM

To: Johanna Munson; Kurt Wiedenmann; Brent Ralston

Subject: one pager on imp strat

I'm not looking for suggestions. If something is wrong or needs changed, do it in track changes and send back.  
Jon

--

Jonathan Beck

Bureau of Land Management

Idaho State Office

208-373-4070

GRSG Coordination.docx  
27K

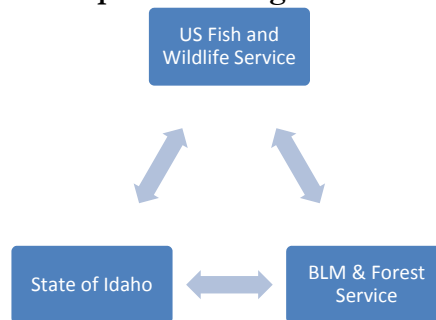
## GRSG Implementation and Coordination

The BLM, Forest Service, US Fish and Wildlife Service and the State of Idaho have coordinated on GRSG monitoring and management for numerous years as part of the 2006 Idaho Sage Grouse Conservation Plan. Much of this ongoing work provides a firm foundation from which to build future coordination efforts, especially in regard to implementation of the GRSG RMP Amendment. With some specific adjustments and additional inclusions in those efforts the effective implementation of the GRSG RMP Amendment can be achieved.

There are several decisions, or components of decisions that would benefit from close coordination between the State of Idaho, BLM, Forest Service and the US Fish and Wildlife Service. These include: application and assessment of the adaptive management strategy; application of the right-of-way screening process; and development and implementation of any potential project mitigation efforts.

Figure 1 describes a conceptual relationship between the agencies for coordination and project evaluation/implementation.

**Figure 1 – Conceptual Relationship Between Agencies**



For description an example project proposal will be tracked through the consideration and evaluation process.

### **I. Project Proposal is Initially Screened by BLM or Forest Service**

This initial screened would evaluate whether the proposal conforms to the land use plan allocation decisions (Open, Open with Limitations, Closed). The BLM/Forest Service Field Office or Ranger District would work in coordination with the State or Supervisor's Office to evaluate this conformance.

For BLM if the proposal is not in conformance then a non-conformance letter from the State Director would be sent to the project proponent and the project would not be considered further.

If the project were found to conform to the land use plan allocations then consideration would continue.

### **II. Project Proposal would be Coordinated with State and USFWS**

The State Implementation Task Force (set up through Idaho Executive Order) would convene to apply the right-of-way screening process to the proposal, informed by GRSG population monitoring accomplished by IDF&G. This evaluation would be vetted through the Governor's Office and a recommendation from the Governor would be provided to the BLM/Forest Service.

The BLM and/or Forest Service would work with local offices to apply the right-of-way screening process to the proposal, informed by the disturbance level (cap), and habitat conditions (amount).

The BLM/Forest Service decision maker would utilize the information from internal review and State recommendations to determine whether the project conforms to all land use plan guidance and whether to consider the project further.

For BLM if the proposal is not in conformance then a non-conformance letter from the State Director would be sent to the project proponent and the project would not be considered further.

If the project were found to conform to the land use plan guidance then consideration would continue.

### **III. BLM and/or Forest Service would Initiate Project NEPA**

The NEPA analysis would be developed by the local unit office in full consideration of local habitat conditions. This process would describe alternatives to the proposal that would reduce or eliminate impacts and full identify residual impacts to GRSG.

### **IV. Share Residual Impacts with the State of Idaho and USFWS**

The State Implementation Task Force would consider the residual impacts and work to develop an appropriate mitigation package to be included within analysis of the project proposal. This Governor would recommend to BLM the inclusion of the mitigation package within the project proposal.

### **V. BLM Incorporates and Analyzes Mitigation in NEPA Evaluation**

### **VI. State of Idaho would Administer Mitigation Consistent with the Mitigation Strategy**

As part of the implementation of the GRSG RMP Amendment the BLM and Forest Service will work cooperatively with the State to develop a Mitigation Strategy. Part of this strategy will define the operating procedures such as credits, banking, funding process, etc. This component is likely to strongly involve State oversight, with the specifics remaining to be determined.

### **VII. Mitigation is Implemented**



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Grass bank language

1 message

Carman, Stephanie &lt;scarman@blm.gov&gt;

Mon, May 4, 2015 at 8:30 AM

To: Joan Suther <jsuther@blm.gov>, Lauren Mermejo <lmermejo@blm.gov>, Jonathan Beck <jmbeck@blm.gov>, Quincy Bahr <qfbahr@blm.gov>, Pamela Murdock <pmurdock@blm.gov>, "Carlson, John C" <jccarls@blm.gov>, Erin Jones <erjones@blm.gov>, Bridget Clayton <bclayton@blm.gov>

Cc: Michael Hildner <mhildner@blm.gov>, Matthew Magaletti <mmagalet@blm.gov>, Vicki Herren <vherren@blm.gov>, Kimberly Hackett <khackett@blm.gov>, David Batts <david.batts@empis.com>, Richard Mayberry <rmayberr@blm.gov>

As you may have heard, we are changing the drop in language referencing grass banks as an example. Please use the below language instead in the grazing section:

- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives, such as reserve common allotments or fire breaks.*

A reserve common allotment is an area which is designated in the land use plan as available for livestock grazing but reserved as an area available for use as an alternative to grazing in another allotment in order to facilitate rangeland restoration treatments and recovery from natural disturbances such as drought or wildfire. The reserve common allotment would provide needed flexibility that would help the agency apply temporary rest from grazing where vegetation treatments and/or management would be most effective.

Stephanie Carman  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)



Beck, Jonathan <jmbeck@blm.gov>

## high voltage transmission line drop-in

1 message

Hildner, Michael <mhildner@blm.gov>  
To: Jonathan Beck <jmbeck@blm.gov>  
Cc: Lauren Mermejo <lmermejo@blm.gov>

Mon, Feb 9, 2015 at 12:39 PM

Hi Jon,

Thanks for bringing that error to my attention. The correct guidance is below. I've also updated the WO files, so it has the right guidance:

For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that are co-located), apply the following language as a management action in their ADPP:

“Priority Habitat Management Areas (PHMAs) and **Important Habitat Management Areas (IHMAs)** are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzingGRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”

—  
Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
[mhildner@blm.gov](mailto:mhildner@blm.gov)



**Ralston, Brent E**

---

**From:** Mermejo, Lauren L  
**Sent:** Friday, June 01, 2012 12:19 PM  
**To:** Ralston, Brent E; Amme, Brian C; Bahr, Quincy F; Sovey, Sally J; Kosic, Arlene D  
**Cc:** Banks, Don; Foss, Jeffery L; Haske, Michael J; Morales, Raul  
**Subject:** GRSG SD Guidance  
**Attachments:** GRSG3 - Recomend Chapter 2 Outline for New Amendments DD 05072012.docx; GRSG8 - Cumulative Effects Concept of Operations DD 05182012.docx; GRSG4 - WO Review Framework DD 05182012.docx; GRSG4 - Regional Mgmt Team Coordination and Review Protocol DD 05182012.docx

Hi Folks –

Every two weeks the State Directors involved in the GRSG National Planning Strategy, Ed Roberson, Jessica Rubado, Johanna and myself engage in a conference call to make decisions on issues that have come forward at a national scale. The attached documents are instructional guidance that have been approved by the State Directors to be carried forward into the planning efforts.

GRSG3 is the Chapter 2 Outline that I e-mailed to you all earlier this week.

GRSG4 is made up of two documents: One on how the Alternatives, Drafts, and Finals will proceed thru reviews from the Regional Management Teams; and the other on how they will proceed thru reviews at the Washington Office (with time-lines).

GRSG8 is an overview of the Cumulative Effects Strategy (Environmental Baseline Report, Timeline and Schedules, Related Technical Supports; CEA Collaboration and Communication, and the Way Forward).

In addition, earlier in May, the SDs agreed that a no grazing alternative will be considered (either fully analyzed or as an alternative considered but eliminated from detailed analysis) in the sub-regional EISs.

As the conference calls occur and issues are resolved, I will be forwarding the issue papers (instructional guidance) or verbal decisions that are agreed upon.

This afternoon's conference call will focus on ACECs guidance; NTT language (applicable and appropriate); and forming a Team to develop consistent language for a variety of topics. I will let you know of the outcome and send forward the issue papers or final outcomes when we have State Director concurrence on those subjects.

If you have any questions, please give me a call.

Lauren Mermejo  
Great Basin Sage-grouse Project Manager  
BLM – Nevada State Office, Reno  
775 861-6580 (Office)  
775 223-2770 (Blackberry)

## GRSG3 – DD: May 7, 2012

### Recommended Chapter 2 Outline Focused on New Greater Sage-Grouse Amendments

(Great Basin and Rocky Mountain Region)

5/2/12

#### Proposed Outline and Alternatives:

Chapter 2 Outline:

1. General Description of each Alternative
2. Management Common to All Action Alternatives
3. No-Action Alternative – Roll-up of management actions that specifically protect Greater Sage-Grouse in existing Land Use Plans into a sub-regional perspective
4. Action Alternatives
  - Alternative 1: State Wildlife Agency/BLM/FS Maps with management from NTT Report applied to PPH and PGH. This would be based off of the initial (or updated) map used for scoping. Any management recommendation from the NTT that would not apply should be clearly described with rationale...such as: “No management actions from the NTT concerning wild horse and burros are carried forward because there are no wild horses or burros in the sub-regional effort.”
  - Alternative 2: Conservation Groups-based Alternative. At a minimum, apply NTT Report management with extended boundaries (PPH/PGH/Connectivity habitat) and more stringent management. May apply ACEC/Special Management Area proposals. This potential alternative is currently being flushed out in Draft by EMPSi based on scoping comments, and will be shared with the “group” within the next few weeks.
  - Alternative 3: Sub-regional adjustments to NTT Report Alternative with BLM/FS map adjustments for PPH and PGH. Make changes to the recommendations from the NTT Report and adjust habitat boundaries based on science, resource trade-offs, scoping comments, and internal staff expertise.
  - Alternative 4: Governor’s State proposals
  - Alternative 5 (optional): Additional alternative(s) There may be sub-regional alternatives that do not apply to other sub-regional efforts that were brought forward from scoping. We do not need to maintain consistency from this perspective....there is some autonomy associated with each of these efforts....and if you need to create another alternative outside of the current range to respond to scoping comments, that is perfectly acceptable.
5. Alternatives Considered but Eliminated from Detailed Analysis
6. Tables
  - Comparison of Alternatives Tables
  - Comparison of Impacts Tables
  - Comparison of Alleviated Threats Tables

#### **Greater Sage-Grouse Goal (common to all)**

*Conserve, enhance, and restore the sagebrush ecosystem upon which Greater Sage-Grouse populations depend in an effort to maintain and/or increase their abundance and distribution, in cooperation with other conservation partners.*

#### **Greater Sage-Grouse Objectives**

*Protect priority Greater Sage-Grouse habitats from disturbances that will reduce distributions or abundance of Greater Sage-Grouse..... (see NTT objectives or others)...**will change by alternative.** We*

will need to work on some consistency in objective statements across those alternatives that are closely related by sub-region....such as Alternative 1 and 2.

**Outline for RESOURCE DECISIONS for Greater Sage-Grouse** Note: All of the Headings in Chapter 2 and proposed decisions come out of the NTT Report – so, in at least one alternative, these headings should show up with proposed management decisions or allocations. Based on scoping comments, other resources may apply.

**Lands and Realty** (Addresses threats/issues associated with infrastructure [power lines, communication towers, railroads, etc.]; urbanization; renewable energy development; transmission corridors; habitat conversion to agriculture; and locatable mineral development)

Among others, includes decisions (regulatory mechanisms) for:

- Rights-of-way;
- Land tenure adjustments;
- Utility corridor designation;
- Proposed mineral withdrawals.

**Vegetation** (Addresses threats/issues associated with Pinyon-juniper encroachment; invasive plants (annual grasses and other noxious weeds); riparian areas; and habitat restoration activities.)

Among others, includes decisions (regulatory mechanisms) for:

- Vegetation treatments;
- Prescribed fire;
- Control/suppression and eradication of invasive species;
- Allowable uses or active management/treatment;
- Riparian areas;
- Habitat restoration activities.

**Wildland Fire** (Addresses threats/issues associated with wildfire suppression, fuels management, and fire rehabilitation.)

Among others, includes decisions (regulatory mechanisms) for:

- Fire management strategies and areas identified for suppression;
- Fire suppression activities and ESR activities.

## **Minerals**

**Leasable Minerals** (Addresses threats/issues with oil and gas leasing and development; geothermal leasing and development; non-energy leasable minerals; - and all associated infrastructure.)

Among others, includes decisions (regulatory mechanisms) for:

- New leases: Areas open/closed to leasing; open with NSO, CSI, TL stipulations;
- Existing leases: Mitigation/BMPs;
- Leasable mineral development on Split-estate lands.

**Coal** (Addresses threats/issues from coal mining and infrastructure.)

Among others, includes decisions (regulatory mechanisms) for:

- Coal leasing and development;
- Existing leases: Mitigation/BMPs.

**Locatable Minerals** (Addresses threats/issues from hard rock mining and infrastructure.)

Among others, includes decisions (regulatory mechanisms) for:

Existing claims and development: Mitigation/BMPs;  
Proposed withdrawals – tied to lands and realty actions (but defines the areas).

**Saleable Minerals** (Addresses threats/issues from saleable mineral development.)

Among others, includes decisions (regulatory mechanisms) for:

Saleable minerals (open or closed);  
Reclamation.

**Travel Management** (Addresses threats/issues associated with motorized access and route networks.)

Among others, includes decisions (regulatory mechanisms) for:

Areas open, closed, or limited to OHV use.  
Implementation-level Travel Plans.

**Recreation** (Addresses threats/issues associated with excessive and focused recreational activities.)

Among others, includes decisions (regulatory mechanisms) for:

Special Recreation Permitting.

**Range Management** (Addresses threats/issues associated with livestock fences; grazing systems; range improvements; season of use; stocking rates.)

Among others, includes decisions (regulatory mechanisms) for:

Completing land health assessments;  
Processing grazing permits;  
Implementing management actions after land health and habitat evaluations;  
Treatments to increase forage for livestock or wild ungulates;  
Structural range improvements and livestock management tools;  
Retirement of grazing privileges.

**Wild Horse and Burro Management** (Addresses threats/issues associated with impacted habitats and increase of exotic plant species – especially during drought.)

Among others, includes decisions (regulatory mechanisms) for:

Appropriate management levels;  
Prioritizing gathers;  
Incorporating habitat objectives and management considerations in all HMAs;  
Land health assessments and structural range improvements.

**Special Designations** (Addresses threats/issues associated with additional special management needed to protect/preserve Greater Sage-Grouse and habitat)

Among others, includes decisions (regulatory mechanisms) for:

Designating Areas of Critical Environmental Concern.

**Other Specific Resources tied threats/issues by Sub-region from scoping or internal expertise.....**

## GRSG4 – DD: May 18, 2012

### FINAL DRAFT (5/3/12)

## Greater Sage-Grouse (GRSG) Regional Management Team Coordination and Review Protocol

### Step 1: Initiate Draft Review – Field/District/State or Sub-regional Office

Conduct an overall review of GRSG plan amendments and/or revisions to evaluate the range of alternatives, Draft RMP, Proposed RMP, and associated NEPA analysis, for compliance with Federal law and policy, including the National BLM Greater Sage Grouse Strategy and recent policy and guidance issued to implement the strategy, including conservation measures identified in the National Technical Team (NTT) Report, and to ensure incorporation of explicit objectives and desired habitat conditions, management actions, and area-wide use restrictions necessary to conserve Greater Sage-Grouse and its habitat. The review process should include:

- Preparing an NTT Conservation Measures Review Table comparing NTT Conservation Measures with existing or proposed conservation measures for each Program Area.
- Identifying which proposed conservation measures deviate from the NTT conservation measures, and providing clear justification or substantiation for the deviation.
- [For Proposed plan amendments and/or revisions only] Preparing a logical and legally supportable rationale and biological substantiation for the Preferred Alternative.

This documentation and Regional review will be required at the following stages of the planning process:

- When the range of alternatives are identified (for new amendments)\*
- Administrative Draft RMP/Draft EIS (before sending back to WO for review)
- Administrative Proposed RMP/Final EIS (before sending back to WO for review)

\*Ongoing Draft and Proposed plan amendments and/or revisions will be initially reviewed for adequacy of alternatives during the Draft or Proposed plan amendment and/or revision review.

The Field/District/State or Sub-regional documentation of this review must be extremely detailed, provide a logical and legally supportable rationale for the determination, and any necessary record support for such rationale. This documentation will suffice as the administrative record for potential litigation and subsequent internal BLM administrative review. If the initial plan revision/amendment is in compliance with Federal law and policy, including BLM IM 2012-044, the planning team will brief the findings to the State Director for RMP approval. Any lack of compliance with Federal law or policy will be addressed prior to State Director submittal to the Regional Project Manager.

### Step 2: Forward Approved RMP Determination/Documentation to Regional Inter-disciplinary (ID) Team through Regional Project Manager

If the affected State Director is satisfied with the outcome of the initial review and findings set forth in Step 1, above, he/she will concur with the findings, and forward them to the Regional Project Manager (PM) via an internal memo.

When GRSG plan amendments and/or revisions are received by the Regional PM, she will convene select members of the Regional ID Team and ad-hoc members, as needed, for a Regional RMP review. At a minimum, review members will include:

- State Project Planning Lead,
- Regional PM,
- Regional PM from the other region,
- Appropriate State Wildlife Agency or other designated representative(s), and
- Regionally assigned USFWS representative(s).

In addition, ad-hoc members may include:

- WO Planning representative,
- WO sage-grouse lead,
- Regionally-assigned USFS representative,
- Regionally-assigned WO Solicitor,
- BLM Management Representatives from other states (other than the State that has completed the initial consistency review), and
- Sub-regional ID Team Leads.

Once the review is completed, and if there is unanimous agreement (not consensus agreement) among the reviewers that the amendment and/or revision is in compliance with Federal law and policy, including BLM IM 2012-044, then the Regional PM will document this finding in a Memorandum for the File (administrative record) with the signatures of each of the reviewers (including the USFWS).

If there is not unanimous agreement, those items requiring further consideration should be consolidated into a briefing paper for the Regional Management Team. However, if the planning effort is in an early stage in the planning process and the issues brought forth can be corrected by making some essential changes (in wording, decisions, or analysis), the Regional PM will discuss directly with the Regional Management Team Leads, USFWS representative, and the affected State Director in an effort to timely resolve the issues. Once agreement is reached, the USFWS will be requested to provide a letter of support.

### **Step 3: Brief the Findings to the Regional Management Team**

The Regional PM will brief the findings of the review to a core group of the Regional Management Team including the State Director Leads from both regions, representatives from the USFWS, State Game and Fish and/or Governor's Office, Forest Service, and other ad-hoc members as appropriate.

The appropriate Regional Management Team State Director will brief and apprise the Management Team of specific items requiring further consideration. If the Regional Management Team also determines that certain elements of the RMP amendments and/or revisions (including range of alternatives, Draft RMP, Proposed RMP, and associated NEPA analysis) are not in compliance with Federal law and policy, including BLM IM 2012-044, they will provide recommendations to the State Director.

### **Step 4: WO Review and Approval**

The RMP amendments and/or revisions (including range of alternatives, Draft RMP, Proposed RMP, and associated NEPA analysis) forwarded to the WO for final approval prior to printing or FRN release will

include an appropriate briefing package for the Director including a transmittal memo that outlines the state, sub-regional and regional coordination and review process and findings, relevant background information, and any issues, anomalies, or unresolved issues. The Regional ID Team concurrence signature page should also be attached to the memo.

For more information on the WO review framework, see WO Information Memorandum dated \_\_\_\_\_ from Ed Roberson.

**GRSG4 – DD: May 18, 2012**

**Information Memorandum**

**To:** Rocky Mountain and Great Basin Regional Management Teams

**From:** Ed Roberson, Assistant Director, Renewable Resources and Planning

**Date:** INSERT

**Re:** Greater Sage-Grouse review framework and land use planning guidance

This memo provides a review framework for the regional Greater Sage-Grouse Resource Management Plan (RMP) Amendment Environmental Impact Statements (EISs) along with ongoing RMP amendments and/or revisions within Greater Sage-Grouse habitat that will be considering the conservation measures identified in the Sage-Grouse National Technical Team (NTT) Report. It also provides additional guidance on a number of Greater Sage-Grouse planning issues.

**Responsibilities**

The BLM National Greater Sage-Grouse Planning Strategy Charter established teams at various levels throughout the BLM, and also set out the teams' membership, roles and responsibilities. For the purposes of the NTT review process, each team identified in the charter was given a specific role. The National Policy Team (NPT) was charged with overseeing the development of consistent regulatory mechanisms across the range of the Greater Sage-Grouse. The Regional Management Teams (RMTs) were charged with facilitating partner engagement in the BLM planning process and fostering broad collaboration for Greater Sage-Grouse conservation; evaluating the adequacy of current RMPs and ongoing amendments and/or revisions to determine the level of revision or amendment needed; and providing direction for consistent Purpose and Need statements and range of alternatives. The Regional and Sub-regional IDTs were charged with incorporating the conservation measures into the alternatives and ensuring consistent application.

**Planning Strategy Instruction Memorandum (No. 2012-044)**

The Planning Strategy IM provided specific direction to the BLM on how to consider the conservation measures contained in the NTT Report during the land use planning process. Specifically, the conservation measures must be considered and analyzed, as appropriate, into at least one alternative in the land use planning process. Thus, each Sub-regional Interdisciplinary Planning Team (Sub-regional IDT) must demonstrate that the conservation measures are subjected to a hard look analysis as part of the planning and National Environmental Policy Act (NEPA) process.



## *INTERNAL WORKING DOCUMENT*

To demonstrate this hard look analysis, each Sub-regional IDT needs to document the process they went through in considering the conservation measures. This documentation can be accomplished in a variety of ways, but should include at a minimum the following:

- Administrative Draft RMPs/Draft EISs
  - NTT Conservation Measure review table which identifies which measures were included in the alternatives along with other proposed conservation measures that were not identified in the NTT report.
  - The table should include explanations, with supporting rationale, when the proposed conservation measures deviate from the NTT report, or when specific conservation measures are not considered.
- Administrative Proposed RMPs/Final EISs:
  - A logical and legally supportable rationale and biological substantiation for the Preferred Alternative.

This table will need to be included with the internal review planning documents submitted to the BLM Washington Office (WO).

### **Regional Management Team Coordination and Review Protocol**

To implement these responsibilities, the RMT is developing a review and approval protocol for evaluating the Greater Sage-Grouse RMP Amendment EISs and ongoing RMP amendments and/or revisions within Greater Sage-Grouse habitat to determine if they meet the intent of the NTT Report and are in conformance with the requirements of IM No. 2012-044. The U.S. Fish and Wildlife Service (FWS), U.S. Forest Service (FS), and State Fish and Game Agencies, are members on the RMTs and Sub-regional IDTs. Before any Greater Sage-Grouse RMP Amendment EISs or ongoing RMP amendments and/or revisions within Greater Sage-Grouse habitat are sent to the WO for formal review, the RMT review process must be able to document whether the FWS agrees that the planning document meets the intent of the NTT Report and is consistent with the requirements of WO IM No. 2012-044. This documentation will be required at the following stages of the planning process:

- Administrative Draft RMP/Draft EIS (before sending back to WO for review)
- Administrative Proposed RMP/Final EIS (before sending back to WO for review)

Once the planning documents meet these requirements, they can be transmitted to the WO for formal review.

For more information on the RMT Review Protocol, see (CITE TO JOHANNA'S MEMO)

### **Washington Office Sage Grouse Planning Review Team**

The WO has established a Greater Sage-Grouse Planning Review Team that will be charged with reviewing all Greater Sage-Grouse RMP Amendment EISs and all ongoing RMP amendments and/or revisions within Greater Sage-Grouse habitat. This team will include representation from each of the following resource programs:

- Planning and NEPA

*INTERNAL WORKING DOCUMENT*

- Range Management
- Wildlife
- Fluid Minerals
- Solid Minerals
- Lands and Realty
- Travel and Transportation
- Recreation
- Wild Horses and Burros
- Fire Management
- WO Solicitors Office

The Greater Sage-Grouse Planning Review Team will be tasked with reviewing the Greater Sage-Grouse RMP Amendment EISs and the relevant Greater Sage-Grouse sections of the ongoing RMP amendments and/or revisions to ensure that applicable conservation measures have been considered, as per the requirements the NTT Report and IM No. 2012-044. As specified earlier, a NTT conservation measure table must be included as part of each review to explain how conservation measures were addressed/incorporated.

For the Greater Sage-Grouse RMP Amendment EISs, the WO Planning review must occur at the following stages of RMP development. The Greater Sage-Grouse Planning Review Team will complete its review within the following timeframes:

- Upon completion of a draft range of alternatives – 1 week
- Administrative Draft RMP/Draft EIS – 2 weeks
- Administrative Proposed RMP/Final EIS – 2 weeks

For plans currently undergoing amendment and/or revision in Greater Sage-Grouse habitat, the Greater Sage-Grouse Planning Review Team will review the applicable Greater Sage-Grouse sections as per the normal WO RMP review process. However, the timeframes associated with the reviews will be expedited from the normal 3 week review period to the following:

- Administrative Draft EIS – 2 weeks
- Administrative Final EIS – 2 weeks

Upon completion of the each review period, the Greater Sage-Grouse Planning Review Team will provide a briefing/summary to the NPT.

**GRSG8 – DD: May 18, 2012**

**Concept of Operations  
for BLM’s Greater Sage-Grouse Baseline Report  
and Cumulative Effects Analyses**

This Concept of Operations is the approach for implementing both the “BLM’s Greater Sage-Grouse Unifying Cumulative Effects Strategy” issued in November 2011 and addressing related technical questions for measuring condition and trend over time. The goal of Cumulative Effects Strategy is to provide a framework and methodology for conducting cumulative effects analyses as part of the greater sage-grouse planning initiative, and in particular provide consistency at multiple spatial scales. As a principle component of the cumulative effects effort, the Environmental Baseline Report will set a baseline for the resources that will address cumulative effects at planning unit, sub-regional, and regional levels. The Baseline report should be incorporated into related NEPA analyses by reference. The purpose of the Cumulative Effects Analysis Concept of Operations (CEACO) is to describe roles for “how” work will get done and expectations for collaboration and communication with others.

**A. Environmental Baseline Report**

In response to the FWS 2010 Listing Decision, the Baseline Report and Cumulative Effects Framework will focus on the quantity and distribution of:

1. Habitat (Priority and General)
2. Habitat Threats
3. Habitat Protections

And at three different scales:

1. Range-wide
2. Regions
3. Sub-regions

The environmental baseline report is a critical initial step for consolidating information useful the regional, subregional and planning unit team products. The following identifies milestone steps and dates related to the CEA effort.

**B. Timeline and schedules**

- |   |                     |
|---|---------------------|
| • Complete the IGO with USGS                          | April 11, 2012      |
| • Develop draft environmental baseline report outline | April 13, 2012      |
| • Final Baseline report outline                       | April 30, 2012      |
| • Final analyses (habitat/protection/threats)         | June 29, 2012       |
| • Draft Baseline report                               | July 27, 2012       |
| • Final Baseline report                               | September 14, 2012* |

*\*Note that the final is a deliverable date; however, the planning teams should have access to preliminary analyses, results and references by late July 2012.*

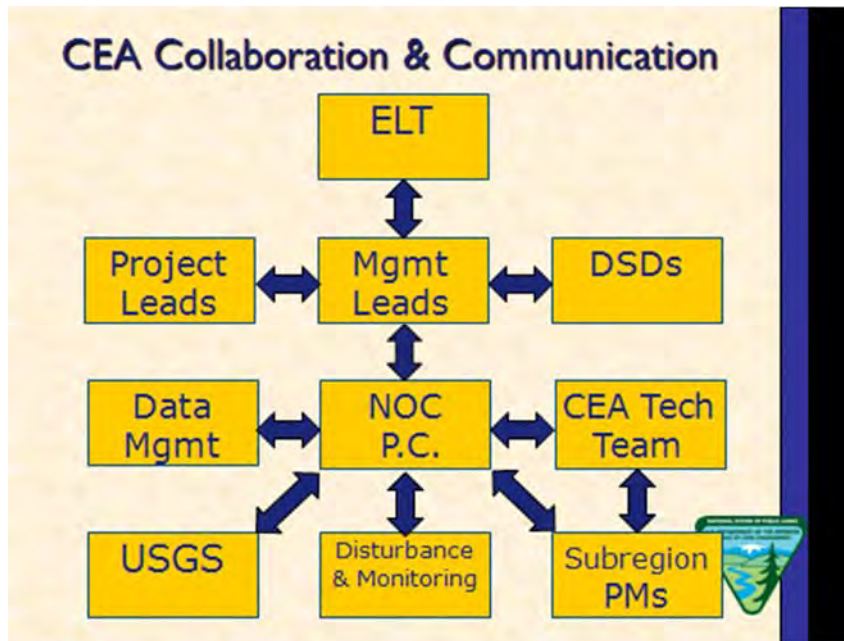
### **C. Related Technical Support**

In addition to the immediate tasks associated with the Baseline describing current cumulative impacts, related technical support is needed to clarify the framework for analyzing alternatives, and developing recommendations for incorporating a reliable measure for potential cumulative effects of the future. This includes both direct disturbance and habitat condition at multiple scales.

The hierarchy of technical support described in the following section will also provide expertise on parallel efforts such as:

- 1) Support for CEA framework
  - Compilation of additional data supplemental to the framework
  - Gather alternative data from teams for consistency checks
  - Provide supplemental analyses of alternatives to subregional teams and EMPSi
  - Support subregional team reporting
- 2) Measuring disturbance
  - Definition
  - Available methodologies
- 3) Monitoring
  - Evaluate key ecosystem attributes and core indicators from AIM for applicability for sage grouse
  - Make recommendations for a solid foundation upon which Greater Sage-Grouse habitat cumulative effects can be assessed over time

### **D. CEA Collaboration and Communication**



- **Executive Leadership:** The Management Leads for the CEA effort report to the BLM members of the National Policy Team.
  - Ed Roberson, Amy Lueders, and Don Simpson.
- **Management Leads:** A DSD and NOC DRS Division Chief will oversee direction of the CEA efforts
  - Theresa Hanley and Roxanne Falise.
- **Program/Project Leads:** Principle leaders for the national programmatic effort and the Great Basin/Rocky Mountain Regional Teams.
  - Members: Joe Stout, Jessica Rubado, Lauren Mermejo, and Johanna Munson.
- **NOC Project Coordination:** Staff responsible for execution and delivery of national CEA efforts, including delivery of the Baseline Report. These individuals work in partnership with USGS Fort Collins Science Center who is responsible for developing and issuing the Baseline Report via an interagency agreement. Additionally, oversees and directs priorities for related work of the NOC Wildlife Habitat Spatial Analysis Lab.
  - Frank Quamen, David Wood, Jim Wood, TBD Data Administer, and NOC Wildlife Habitat Spatial Analysis Lab
- **CEA Technical Team:** These individuals are considered experts in their fields and were responsible for developing the Strategy referenced above. This team may continue to advise on developing analytical products, review of deliverables and integration of products into the regional planning processes.
  - Members: Tom Rinkes, Chris Keefe, Robin Sell, Brian Amme, Doug Havlina, Dave Goodman, Patrick Mahoney, Frank Quamen, David Wood, Ben Kniola, Mike Pellant, Jeff Rose (BLM); Glen Stein, Chris Colt, Dustin Bambrough, Pam Bode (USFS). Additional subject matter experts will be added as needed.
- **Data Management Team:** This team works with overall GSG strategy data management hierarchy in order to advise on direction related to data acquisition and sharing.
  - Members: Duane Dippon, Steve Gregonis, Shawn Servoss, Russ Jackson, Frank Quamen, Lara Juliusson, Ben Kniola, Brian Mueller, Patrick Mahoney, and SO GIS Program Leads.

- **Disturbance Monitoring Team:** This team proposes defensible methods and helps ensure an acceptable level of consistency for analyzing disturbances to habitat caused by land uses.
  - Members: Frank Quamen, David Wood, Chris Keefe, Jason Taylor, and Matt Bobo.
- **USGS:** A team of USGS scientists are working in partnership with BLM to provide additional science support, peer review and products.

#### **E. A Potential Way Forward:**

The conceptual models, key ecosystem attributes, and core indicators and methods from the BLM Assessment, Inventory, and Monitoring (AIM) Strategy provide a structured, defensible framework to describe the condition, trend, amount, location, and pattern of habitats managed by the BLM. Specifically the key ecosystem attributes (biological integrity, site and soil stability, hydrologic function, and landscape integrity) and their associated indicators of habitat quality, provide a solid foundation upon which Greater Sage-Grouse habitat (and simultaneously, other habitat) cumulative effects can be assessed on lands managed by the BLM. Collection of these AIM-based monitoring data west-wide has just begun; and therefore; these data can currently provide only a low-precision, broad-scale measure of rangeland health. That said, the framework upon which AIM is built may serve as a model for how we can measure cumulative effects now, and how to reliably measure and document potential cumulative effects of the future.

**Brent Ralston**

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**From:** Timothy Murphy  
**Sent:** Sunday, October 19, 2014 9:11 PM  
**To:** Jeffery Foss; Brent Ralston  
**Subject:** Fwd: GrSG Key Issue Paper and Agenda for Monday  
**Attachments:** GRSB\_SD\_Prep\_morning\_agenda\_10\_15\_14.docx;  
GRSB\_BLM\_DOI\_coord\_afternoon\_agenda\_10\_15\_14.docx; GRSB\_Key\_Issues\_10\_17\_14.docx

I assumed, wrongly mind you, that Jeff was included in the addressing as in past material from Ed. Looking this over I think I'm prepared for the meeting tomorrow, Monday. 0900 to 1200 BLM, 1 - 4 BLM and DOI

Sent from my iPad

Begin forwarded message:

**From:** "Roberson, Edwin" <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** October 17, 2014 at 7:17:10 PM EDT  
**To:** James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, "Perez, Jerome E" <[jperez@blm.gov](mailto:jperez@blm.gov)>, "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Jamie Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, "Simpson, Donald A" <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Ronald Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Michael Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>  
**Cc:** Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, Kathryn Stangl <[kstangl@blm.gov](mailto:kstangl@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Jessica Camargo <[jcamargo@blm.gov](mailto:jcamargo@blm.gov)>, Jamie Harrison <[jharriso@blm.gov](mailto:jharriso@blm.gov)>, Joanne Maluotoga <[jmaluoto@blm.gov](mailto:jmaluoto@blm.gov)>, Judith Frye <[jfrye@blm.gov](mailto:jfrye@blm.gov)>, Annette Fournier <[afournie@blm.gov](mailto:afournie@blm.gov)>, Kathy Mondor <[kmondor@blm.gov](mailto:kmondor@blm.gov)>, Samuel Herbert <[sjherber@blm.gov](mailto:sjherber@blm.gov)>, Stella Portillo <[sportill@blm.gov](mailto:sportill@blm.gov)>, Toni Rohm <[trohm@blm.gov](mailto:trohm@blm.gov)>  
**Subject:** GrSG Key Issue Paper and Agenda for Monday

Dear Sage-grouse SDs, Mike and Ron,

I am getting ready to go home for the day and wanted to send you the agenda and some more reading material for our discussions on Monday.

Joe sent you out three papers yesterday for your review. I have attached a paper that includes the 12 key remaining issues that were discussed last week in our meeting with the states representatives in Denver. The paper highlights each issue and provides either the direction we will proceed with or recommendations for discussion and decision. The paper also has 5 attachments including: a Disturbance white paper, GrSG Land use plan objectives guidance, guidance for incorporating GrSG RMP decisions into grazing authorizations, an updated draft planning schedule, and a paper on the roles and responsibilities for a GrSG strike team process with steps to get us to the ROD. The discussion in the morning will help us prepare for the afternoon meeting.

As the first agenda shows, we will discuss these on Monday morning between 9 and 12. Then we will go to lunch and meet up with Sarah, Jim and Bret. The afternoon provide time for Sarah and Jim to discuss the status of the one-on-one meetings with the states; to share with Sarah, Jim and Bret where BLM is with the 12 remaining key issues; and to have a discussion about next steps. This is where we will discuss the planning schedule, strike teams, our approach on the input into the conservation efforts data base and stakeholder outreach.

Hopefully Sarah, Jim and Bret will be able to hang around for dinner and some social time with our ELT members before returning to DC. But that is not the end of our fun GrSG day. Amy and I want to meet with you all again after dinner for a discussion related to Plan Implementation. Our resources DSDs met a few weeks ago on this and we need to discuss some key aspect of implementation and begin to make some key decisions about approaches. On Monday morning we will hand out some information developed by the DSDs to help us focus our discussion on what the plan implementation workload will be and to help us discuss how to organize it. I know that you all will be tired at the end of the day. Unfortunately there's no rest in sight for a while. Monday will help us insure we are all in alignment and on the page as we move to completion of our proposed plans, then to the signing of the RODs and finally to implementing the plans effectively across the range.

Thank you all for all you and your teams have done to date. See you Monday. ed



GREATER SAGE GROUSE MEETING  
NATIONAL CONSERVATION TRAINING CENTER  
SHEPHERDSTOWN, WV  
OCTOBER 20, 2014  
BLM/DOI Coordination  
1:00pm – 5:00pm

Meeting objective : To discuss BLM's approach on the remaining GRSG key issues and reach agreement on a path forward and next steps.

- |                    |   |
|--------------------|---|
| 12:00 pm – 1:00 pm | Lunch with Department   |
| 1:00 pm            | Welcome and meeting objectives – Neil and Steve   |
| 1:15 pm – 2:00 pm  | Update on one-on-one state meetings – Sarah Greenberger, Jim Lyons and Bret Birdsong  |
| 2:00 pm – 3:30 pm  | Review of BLM's approach to Key Issues – Ed <ul style="list-style-type: none"><li>• Disturbance</li><li>• Mitigation</li><li>• Adaptive Management</li><li>• Vegetative Objectives</li><li>• Livestock Grazing</li><li>• Allocations (ROWs, Corridors, Mineral Materials)</li><li>• NSO language for fluids</li><li>• Smart from the start (conservation objective for leasing and development)</li><li>• Coal Suitability</li><li>• Mapping (PAC boundaries)</li><li>• Political Boundary Issues</li><li>• Buffers</li></ul> |
| 3:30 pm            | Break   |
| 3:45 – 5:00 pm     | Next Steps – Ed <ul style="list-style-type: none"><li>• Planning Schedule/Strike Team</li><li>• Plan Consistency</li><li>• Conservation Efforts Database</li><li>• Stakeholder Outreach</li></ul>   |
| 5:00 pm            | Closing Remarks/Adjourn – Neil and Steve  |

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## GRSG Planning - Key Remaining Issues

- Issue: Disturbance  
Direction: Per the original April 2014 NPT guidance on disturbance, all states will use the 3% disturbance cap, with the exception of WY which is 5%. See [Attachment 1](#) for the appropriate scales, methodology for calculating disturbance, and recommended ADPP drop-in language.
- Issue: Mitigation  
Direction: 1) Consistent with the Mitigation Framework which is to be incorporated into all ADPPs as an appendix, the following language should also be incorporated as a proposed plan management action under Special Status Species (GRSG) (excluding Wyoming ADPPS):
- “A net conservation gain to the greater sage-grouse will be achieved by implementing restoration conservation actions outlined in this proposed plan [or amendment], applying a no net unmitigated loss standard for authorized land uses in all GRSG habitat [mention all areas that make up GRSG habitat: PHMA, GHMA, IHMA, and/or Core], and, strategically siting compensatory mitigation actions, via a WAFWA Management Zone Regional Mitigation Strategy as part of a mitigation program in order to achieve cumulative benefits (as outlined in [Appendix X]).”
- As defined in the Mitigation Framework Appendix – “No net unmitigated loss means that impacts from implementation level actions will fully offset to benefit the species. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”
- Issue: Adaptive Management (Highlighted Areas = other potential options/recommendations to consider)  
Recommendation: 1. Wyoming BLM: All remaining WY ADPPs will follow the NPT Adaptive Management guidance and sideboards (WY BLM has proposed Buffalo, Bighorn Basin, and the WY 9 Plan ADPPs to incorporate the Wyoming GRSG Adaptive Management Plan that has been developed by the BLM, FS, USFWS, and WGFD and is also being applied to the Lander planning area). BLM WY’s hard trigger response is provided below:
- “Upon determination that a hard trigger has been tripped, the BLM and FS will immediately defer issuance of permits for new actions with the potential to adversely affect Greater Sage-Grouse. Within 14 days of a determination that a hard trigger has been tripped, the Adaptive Management Working Group will convene and initiate an assessment to determine the causal factor or factors (hereafter called the causal factor

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assessment). The management agency (BLM and/or FS) and adaptive management group will implement an interim response strategy to direct management until causal factors and appropriate responses can be determined. Recommendations of the adaptive management working group will be implemented immediately through the means most appropriate to the agencies in question. This may include cessation of activities or implementation of measures analyzed in this EIS, if supported by the best available science. The causal factor assessment will be completed within 180 days of initiation. Once the causal factor assessment is completed by the Adaptive Management Working Group, the interim response strategy will be modified appropriately. If a causal factor or factors cannot be identified, the interim response strategy shall stay in place until such time a long-term management or planning document can be implemented.”

2. Idaho BLM: will maintain the adaptive management strategy outlined in their DEIS, as a result of their three tiered habitat approach (PHMA, GHMA, and IHMA).

3. All other sub-regions are to follow the NPT Adaptive Management Guidance and Sideboards.

4. Inconsistencies related to varying adaptive management triggers and responses across jurisdictional boundaries will be resolved by the WAFWA Manage Zone Working Groups.

Issue: Vegetation Objectives

Direction: 1) Establish and incorporate vegetative objectives into all ADPPs that do not currently have them, following FS Table 2-6 (habitat objectives). See [Attachment 2](#) for specific guidance and table template.  
2) Vegetation objects that relate directly to Special Statuse Species (SS) should be in the SS section of the ADPP and pure vegetative objectives should be in the Vegetation section of the document.

Issue: Livestock Grazing Modifications

Direction: 1) The following should be included in the Livestock Grazing section of the ADPPs.

- The BLM will prioritize the modification of grazing permits within GRSG habitat. In setting priorities, areas not meeting land use plan vegetation objective and/or Land Health Standards will take precedence.
- The NEPA analysis for proposed modification of livestock grazing permits/leases will include a range of alternatives that allows the authorizing officer to make adjustments to livestock grazing

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without conducting additional NEPA and issuance of a proposed/final grazing decision.

- Allotments within GRS habitat will be prioritized for annual review to ensure compliance with the terms and conditions within the grazing permits. When BLM conducts monitoring at a minimum, actual use, utilization, and use supervision data will be collected.

2) See [Attachment 3](#) as to how BLM will incorporate GSGR decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

Issue:

High-voltage Transmission and Major Pipeline ROWs and Corridors

Direction:

1) All sub-regions will apply the recommended NPT allocation guidance for PHMA and GHMA.

2) For sub-regions that have planned priority transmission lines that traverse their planning area (TransWest Express, Gateway South, Gateway West, and Boardman to Hemingway), they will apply the following language as a management action in your sub-regional ADPP:

“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs. All authorizations in these areas must comply with the RDFs and avoidance criteria presented in [\[insert citation here\]](#) of this document. The BLM is currently processing an application for [\[Insert name of transmission project\]](#) and the NEPA review for this project is well underway. This project will include GRS mitigation measures that the BLM is in the process of analyzing through the project’s NEPA review process, therefore these projects would not be subject to the following avoidance criteria and RDFs outlined in this document [\[list the criteria/RDFs\]](#).”

3) UT will not designate corridors (will use WY model, closing all of the PHMA in question except for the route of an existing powerline).

Issue:

Mineral Materials (Salable Minerals)

Direction:

The original NPT Allocation language related to mineral materials has been modified. The following management action should be applied to all ADPPs as follows:

“PHMAs will be closed to new mineral material sales. However, these areas would remain “open” to free use permits and the expansion of existing active pits, only if the following criteria is met:

- the activity is within the BSU and project area disturbance cap;

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- the activity is subject to no net unmitigated loss;
- the activity applies all applicable required design features; and
- the activity clears the specific sub-regional screening criteria.”

With the exception of Wyoming ADPPs, all other sub-regions will adopt the above this modified NPT guidance language as a management action.

Issue: No Surface Occupancy (NSO) Exception and Modification Language  
Direction: Sub-regional ADPPs for both the Rocky Mountain and Great Basin will include the following NSO language into their ADPPs:

“A modification or exception may only be considered where the proposed action is determined to be in non-habitat, the area is not used by GRSG, and the proposed action would not have direct, indirect, or cumulative effects to GRSG or its habitat. The determination would be made by the BLM in consultation with a team of agency GRSG experts, including an expert from the state wildlife agency, USFWS, and BLM/FS. The State Director must have received a determination before approving any modification or exception. All modifications or exceptions must be approved by the State Director.

Issue: Fluid Mineral Resource Allocation (Including Geothermal)  
Direction: SMART from the START – All ADPPs will include the conservation objective for leasing and development outside of PHMAs, similar to what was included in the Lander ROD:

“In order to avoid surface-disturbing activities in PHMAs, priority will be given to leasing and development of oil and gas and other mineral resources outside of PHMAs, subject to applicable stipulations and valid existing rights. When analyzing leasing and authorizing development of oil and gas and other mineral resources in PHMAs, subject to applicable stipulations for the conservation of greater sage-grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse.”

Issue: Coal Suitability  
Direction: 1) ADPPs cannot "close" areas to coal leasing to protect Sage-grouse without going through the suitability process. The suitability determinations in the previous plan (existing management) – and any open/closed allocation decisions for coal leasing based on past determinations – would remain in place.  
2) Sub-regions will include a management action that states:

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“At the time an application for a new coal lease or lease modification is submitted to the BLM, the BLM will determine whether the application area is “suitable” or “unsuitable” for coal leasing. During this process, portions of the application area may not be considered for leasing if leasing is proposed in PHMAs or GHMAs and is likely to have a direct, indirect, or cumulative effect on GRSG or its habitat .”

Issue: Mapping

Direction: 1) NV (in agreement with the State) will use the Coates map to redraw the PACs.  
2) UT will manage non-habitat (Opportunity Areas) as PHMA. All habitats in PACs will be managed as PHMA. Anthro and West Tavaputs will be managed as PHMA.

Issue: Buffers

Direction: Best available science – USGS is currently in the process of facilitating a literature review of the science associated with all buffers identified in the plans. This literature review will be followed by a peer review process. If a buffer distance is not supported by the best available science, this information will be considered in the relevant plan revision or amendment when undergoing WO strike team review.

Issue: Schedule

Direction: Final ADPP allocation data needs to be submitted to the NOC no later than October 31<sup>st</sup>.

For the full proposed GRSG Planning Schedule, see [Attachment 4](#).

Issue: GRSG Washington Office Strike Team

Direction: GRSG strike team will include a consistency review team that reviews the documents prior to Washington Office review/kick-off. This team will also participate in development of the Record of Decisions. See [Attachment 5](#) for GRSG Strike Team Roles and Responsibilities. The GRSG Washington Office Strike Team will:

- Ensure National Policy Team guidance and management direction is consistently incorporated into the GRSG Proposed Plans/Amendments
- Ensure that the Proposed Plans/Amendments include the appropriate conservation framework and objectives
- Ensure the plans collectively result in a cohesive federal land management conservation strategy for the GRSG
- Ensure consistency with the Record of Decisions

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Issue: Plan Consistency

Recommendation: 1) All ADPP amendments will use the Chapter 2 Template provided to the State Directors on October 1, 2014.  
2) The ADPP revisions will use a consistent approach for consolidating all related GRSG proposed management actions in one similar location in the ADPPs. WO-210, BLM Wyoming, and BLM Montana are in the process of developing this approach.

## Attachment 1 – Disturbance White Paper

### Greater Sage -Grouse (GRSG) Land Use Plan Disturbance Cap

#### Purpose

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER data in the land use plans and the use of the west-wide sagebrush availability and habitat degradation estimates for the Priority Habitat Management Areas in each population for management purposes as the LUPs are being implemented.

#### Guidance

- I. Planning units (except in Wyoming) will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. If the 3% anthropogenic disturbance cap is exceeded on all lands (regardless of ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.
  - b. If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to valid existing rights).
- II. Use of west-wide habitat degradation data well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use west-wide data at a minimum and/or locally collected disturbance data as available for the anthropogenic disturbance types listed in Table 1.
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 8 additional features that are



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considered threats to sage-grouse (see below) using 1 meter resolution NAIP imagery. Use local data if available.

- b) Existing disturbance will be calculated in Wyoming using the Density and Disturbance Calculation Tool (DDCT). This tool along with the State of Wyoming's Core Area Strategy allows for the use of a 5% disturbance cap.
- IV. Fire-burned and habitat treatment areas will not be included in the project scale disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
- V. Planning units are directed to include a cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area.
- Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments))
- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the proposed plans/ FEISs. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.

Additional Information/Formulas

Disturbance Calculations for the BSUs and for the Project Analysis Areas:

- For the BSUs: % Disturbance = (combined acres of the 12 degradation threats\*) ÷ (acres of all lands within the PHMA s in a BSU) x 100.
- For the Project Analysis Area: % Disturbance = (combined acres of the 12 degradation threats \* plus the 8 site scale threats\*\*) ÷ (acres of all lands within the project analysis area) x 100.

\* see Table 3 \*\* see Table 2

Project analysis area method for permitting surface disturbance activities:

- Draw the project analysis area polygon which consists of a 4 mile buffer around the proposed project footprint plus areas intersected by any 4 mile buffers from nearby leks or mapped seasonal habitats.
- Digitize disturbances, include burned areas if deemed acceptable, from NAIP imagery or use locally available data.
- Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
- Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
- Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

Degradation Type	Subcategory	Data Source	Direct Area of Influence	Area Source
Energy (oil & gas)	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
Energy (coal)	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery

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Energy (wind)	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
Energy (solar)	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
Energy (geothermal)	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
Mining	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
Infrastructure (roads)	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
Infrastructure (railroads)	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
Infrastructure (power lines)	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
Infrastructure (communication)	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

Table 2. The eight additional features to include in the disturbance calculation at the project scale

- |   |
|---|
| <ol style="list-style-type: none"> <li>1. Underground Pipelines</li> <li>2. Coalbed Methane Ponds</li> <li>3. Meteorological Towers</li> <li>4. Nuclear Energy Facilities</li> <li>5. Airport Facilities and Infrastructure</li> <li>6. Military Range Facilities &amp; Infrastructure</li> <li>7. Hydroelectric Plants</li> <li>8. Recreation Areas Facilities and Infrastructure</li> </ol> |
|---|

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Table 3. Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

### Background

In the USFWS’s 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse’s habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

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- Measure 1: Sagebrush Availability (percent of sagebrush per unit area)
- Measure 2: Habitat Degradation (percent of human activity per unit area)
- Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 8 types of features that are threats to sage-grouse will be used in the project analysis areas.

Broad/Mid-Scale (Population)	Intermediate Scale (BSU)	Local/Project (Seasonal Habitat)
<b>Habitat Degradation</b>	<b>Habitat Degradation</b>	<b>Habitat Degradation</b>
Unit: WAFWA Populations	Unit: Biologically Significant Unit	Unit: WAFWA Populations
Area of Interest: PHMAs	Area of Interest: PHMAs	Area of Interest: Project Area or Seasonal Hab.
Data: Westwide degradation data	Data: Westwide <sup>2</sup> , State, Local	Data: State, Local
Formula: 12 Degradation Threats	Formula: 12 Degradation Threats	Formula: 12 Degradation Threats + 8 <sup>7</sup>
(Measure 2a): PHMAs in Populations	(Measure 2a): PHMAs in BSUs	Project/Local Habitat Area <sup>6</sup>
Management: Internal BLM & FS estimates	Management: 3% <sup>3</sup> Cap, Adapt Mgmt <sup>4</sup>	Management: 3% <sup>3</sup> Disturbance Cap
All Lands: Yes	All Lands: Yes	All Lands: Yes
Fire Included: No	Fire Included: No	Fire Included: No
Who: BLM NOC	Who: BLM NOC <sup>5</sup> or State Offices	Who: State Offices or Field Offices
<b>Sagebrush Availability</b>	<b>Sagebrush Availability</b>	<b>Energy and Mining<sup>1</sup></b>
Unit: WAFWA Populations	Unit: Biologically Significant Unit	Unit: Biologically Significant Unit
Area of Interest: PHMAs	Area of Interest: PHMAs	Area of Interest: PHMAs or Project or seas
Data: LANDFIRE Updated EVT	Data: Updated EVT or State data	Data: Westwide <sup>2</sup> , State data
Formula: Existing Updated Sagebrush	Formula: Existing Updated Sagebrush	Formula: Well Pads and Mines
(Measure 1a): PHMAs in Populations	(Measure 1a): PHMAs in BSUs	(Measure 3): Square Mile
Management: Internal BLM& FS estimates	Management: Adaptive Management <sup>4</sup>	Management: Project Authorization
All Lands: Yes	All Lands: Yes	All Lands: Yes
Fire Included: Yes	Fire Included: Yes	Fire Included: No
Who: BLM NOC	Who: BLM NOC <sup>5</sup> or State Offices	Who: BLM NOC or State Offices
<b>Energy and Mining<sup>1</sup></b>	<b>ACRONYMS &amp; NOTES:</b>	
Unit: WAFWA Populations	PHMA = Priority Habitat Management Area; EVT = Existing Vegetation Type; BbS = Areas of Biotic Potential; BSU = Biologically Significant Unit	
Area of Interest: PHMAs	<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.	
Data: Westwide well & mine data	<sup>2</sup> Westwide data will be used only if state or local data are not available.	
Formula: Well Pads and Mines	<sup>3</sup> A 5% disturbance cap will be allowed in Wyoming only.	
(Measure 3): Square Mile	<sup>4</sup> This will be one of several variables used to inform Adaptive Management.	
Management: Internal BLM & FS estimates	<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data / analysis should be used for Adaptive Management.	
All Lands: Yes	<sup>6</sup> The analysis area will be based on a 4-mile project area, 4-mile buffers around leks/ lek complexes, or other seasonal habitat, and clipped to sage-grouse habitat and PHMA (DDCT methodology).	
Fire Included: No	<sup>7</sup> See Table 2 within Additional Information/Formulas	
Who: BLM NOC		

## Attachment 2: Greater Sage-Grouse (GRSG) Land Use Plan Vegetation Objectives

### Greater Sage -Grouse (GRSG) Land Use Plan Vegetation Objectives

After reviewing the vegetation objectives from the current ADPPs and recognizing the wide variation between objectives in the plans, and due to the concern by the FWS about consistency across the land use plans, the following describes a process to gain consistent objectives across the range of sage-grouse while recognizing the unique ecological sites and vegetation characteristics in the planning areas.

#### Purpose

- I. Provide the planning units with template language for a land use planning vegetation objective to be incorporated into the administrative draft proposed plans (ADPP).
- II. Provide guidance on the use of a template for Greater Sage-Grouse (GRSG, sage-grouse) habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on the use of the vegetation and sage-grouse habitat objectives during land health assessments.

#### Background

Vegetation objectives from the current ADPPs have been reviewed and were found to have a wide variation among the plans. Some ADPPs contain vegetation and habitat objectives similar to the direction and template provided above. Some ADPPs contain measurable objectives based on mapped conditions within the planning area. Some ADPPs make a commitment to develop specific objectives through the NEPA process for permit renewals. Several ADPPs refer to using the standards in the Sage-Grouse Habitat Assessment Framework as their objectives and it is recognized that the HAF gives the BLM the tools to make informed decisions about the suitability of sage-grouse habitat through interpretation of the relationships between all the habitat measures and objectives as well as other factors and uses appropriate measures at appropriate scales. This wide variation in vegetation objectives will make it very difficult for the FWS to be able to look across the range. The direction contained in this guidance will resolve this issue.

#### Guidance

- I. Planning units will include the following land use plan vegetation objectives within the Vegetation section of their administrative draft proposed land use plans(ADPPs) that states:
  - a. In all Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover (Aldridge et al. 2008, Doherty et al. 2010, Wisdom et al. 2011). Maintain ecological processes as described in BLM Technical Reference 1734-6 “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) to sustain these habitats.

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BLM has identified lands across the range of sage-grouse capable of producing 10-30% sagebrush canopy cover. The Final EIS will identify the Priority Habitat Management Areas and will include an objective to maintain the desired condition of 10-30% sagebrush canopy cover in a minimum of 70% of those lands.

- II. Planning units will populate the attached template to provide fine- and site-scale vegetation objectives for sage-grouse life history stages based on the ecology in your region. This template should be included in the Special Status Species section of the ADPP. Provide appropriate peer-reviewed science to support the habitat values for the indicators.

Fine- and site-scale sage-grouse habitat suitability indicators for seasonal habitats are identified in the Sage-Grouse Habitat Assessment Framework (HAF). The HAF has incorporated the Connelly et al. (2000) sage-grouse guidelines as well as many of the core indicators in the AIM strategy (Toevs et al. 2011). There may be a need to develop adjustments to height and cover or other site suitability values described in the HAF; any such adjustments should be ecologically defensible. To foster consistency, however, adjustments to site suitability values at the local scale should be avoided unless there is strong, scientific justification for making those adjustments. That justification should be provided. WAFWA Management Zone adjustments must be supported by regional plant productivity and habitat data for the floristic province. If adjustments are made to the site-scale indicators, they must be made using data from the appropriate seasonal habitat designation (breeding/nesting, brood-rearing, winter) collected from sage-grouse studies found in the relevant area and peer-reviewed by the appropriate wildlife management agency(ies) and researchers

ATTRIBUTE	INDICATORS	DESIRED CONDIT ION	Refer ence
<b>BREEDING AND NESTING</b> (Seasonal Use Period March 1-June 15 )			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height		
	Arid sites		
	Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover		
	Arid sites		
Mesic sites			
Perennial grass height			
Perennial forb canopy cover			
Arid sites			
Mesic sites			
<b>BROOD-REARING /SUMMER<sup>1</sup></b> (Seasonal Use Period June 16 -October 31)			
Cover	% of Seasonal habitat meeting desired condition		

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	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
WINTER <sup>1</sup> (Seasonal Use Period November 1 -February 28 )			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. Field offices are to conduct land health assessments at the watershed or comparable, larger scale and use the LUP vegetation objective and the sage-grouse habitat objectives to determine if GRSG habitat is meeting the desired condition.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (IIRH, Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in sage-grouse habitat, the BLM should collect the sage-grouse habitat-specific data to inform the HAF indicators that may not have been collected using the IIRH or the Core Indicators methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.



## Attachment 3: Incorporating GSGR RMP Decisions into Grazing Authorizations

### Incorporating GSGR RMP Decisions into Grazing Authorizations

#### Purpose

The purpose is to provide recommended ADPP language and outline the process for prioritizing the modification of grazing permits/leases, provide for adjusting livestock grazing within the terms and conditions of permits, and accomplish annual compliance monitoring within GRS habitat.

#### Background

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with either:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Appropriation authority (Section 411, PL 113-76-for permits that the BLM is unable to fully process before their expiration).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The rider relieves the BLM’s renewal processing workload while allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015”. The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

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The BLM may modify terms and conditions of a permit or lease following consultation, cooperation, and coordination<sup>2</sup> with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public. Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record, and interested public who is affected by the proposed actions, terms or conditions, or modifications relating to applications, permits and agreements (including range improvement permits), or leases.

A. Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:

- The BLM will prioritize the modification of grazing permits within GRSG habitat. In setting priorities, areas not meeting land use plan vegetation objective and/or Land Health Standards will take precedence.
- The NEPA analysis for proposed modification of livestock grazing permits/leases will include a range of alternatives that allows the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA and issuance of a proposed/final grazing decision.
- Allotments within GRSG habitat will be prioritized for annual review to ensure compliance with the terms and conditions within the grazing permits. When BLM conducts monitoring, at a minimum, actual use, utilization, and use supervision data will be collected.

Process for Modifying Grazing Permits to Meet GRSG RMP Amendments/Revisions Objectives

If an evaluation area includes GRSG habitat that will require the modification of a grazing permit, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

BLM will develop criteria to prioritize the workload to modify grazing permits (fully processed or rider) within GRSG habitat. In setting priorities, areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential examples for prioritizing permit modifications could include:

- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet land use plan GRSG Special Status Species habitat objectives?
- Is there data that indicates that land use plan GRSG Special Status Species habitat objectives are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

The NEPA analysis will include adaptive management options when the GRSG Special Status Species habitat objectives are not being met. The NEPA analysis on the proposed modification of the

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<sup>2</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

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permit/lease should include a range of alternatives that allows the authorized officer to make the following adjustments to livestock grazing without additional NEPA or issuance of a proposed/final grazing decision. Implementation of management actions to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

B. Annual Compliance Monitoring of Modified Grazing Permits.

Allotments within GRSG habitat will be prioritized for annual monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Actual Use
- Utilization
- Use Supervision

## Attachment 4 – National GRSG Planning Schedule

### Schedule Assumptions

1. Modifications made to the ADPPs from roll-up and state meetings will not impact sub-regions from being able to submit their final ADPP data to the NOC by October 31, 2014.
2. All ADPP data submitted to the NOC by October 31, 2014 has been properly QAed/QCed by the BLM States.
3. The WO has the capacity to review all 15 Draft FEISs in 2 weeks.
4. Smooth Protest Resolution process.
5. No appeals from the governor’s consistency review.
6. All plans will go forward with informal Section 7 Consultation (30 days). If formal Section 7 Consultation is need, 135 days would be needed. This consultation would be initiated between steps 9 and 10.

National GRSG Planning Schedule			
Key Milestones are highlighted in red			
Step #	Roll-up/Planning 12 Step Process	Dates	Assumptions/Notes
1	Sub region sends memo to AD 200 for review	Complete	
2	AD 200 reviews memo and contacts sub regional SD.	Complete	
2a	Sub regions send ADPP data to the NOC.	Complete	
3	NOC completes WAFWA MZ Tier II CEA MZ tables	ON HOLD	NOC needs 1 month
3a	NOC completes WAFWA MZ Roll up land use allocation maps	Complete	
3b	EMPSi completes Tier II CEA MZ analysis and sends analysis to sub-regions	ON HOLD	6-10 weeks
4G	Great Basin Federal Family Roll up review meetings	Complete	
4R	Rocky Mountain Federal Family Roll up review meetings	Complete	
5	Meeting with States on Final Federal Plans (Face-to-Face)	10/13/14 to 10/17/14	
6	Final Resolution of Federal Plans (State Director’s meeting)	10/20/14	
7	Secretaries of DOI and USDA Briefing	10/22/14	
	Sub-regions complete ADPP and Chapter 2	10/31/14	
	Sub-regions re-send ADPP data to the NOC, reflecting changes from FFM s, discussions with the States, and from interagency leadership briefings	10/31/14	
3	NOC completes WAFWA MZ Tier II CEA MZ tables	11/21/14	3 weeks  Assumes all data has been appropriately QAed/QCed
3b	EMPSi completes Tier II CEA MZ analysis and sends analysis to sub-regions	11/21/14 to 1/2/15	6 weeks
	Direct and Indirect impact analysis is completed for the proposed plan	10/31/14 to 12/3/14	5 weeks
	BLM/FS ID-teams review of impact analysis (for those planning efforts using contractors on ly)	12/3/14 to 12/17/14	2 weeks
	BLM/FS ID-teams review CEA	1/2/15 to 1/16/15	
	BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	1/2/15 to 1/16/15	2 weeks
	EMPSi revises CEAs	1/17/15-1/27/15	

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	Consistency Review Strike Team Reviews all 14 Draft FEISs.	1/19/15 to 1/26/15	1 week
	BLM/FS ID-teams respond to potential issues from Consistency Review Strike Team.  BLM/Contractors incorporate CEAs and make modifications for WO Review versions of the FEIS.	1/26/15 to 1/30/15	1 week
	Submit briefing packet to WO/WO Review Kick-off Briefing	2/2/15	
8	WO Review (CONCURRENT COOPERATING AGENCY REVIEW)	2/2/15 to 2/13/15	2 weeks
	BLM Consolidate/filter all WO BLM/FS & SOL/OGC comments	2/16/15 to 2/18/15	2 days
8a	Sub-regions respond to WO review comments	2/18/15 to 2/25/15	1 week
8b	WO resolves any pending concerns that arise out of the WO Review	2/25/15 to 2/27/15	2 days
	BLM/Contractors make modifications in Public Review versions of the FEIS.	2/27/15 – 3/5/17	1 week
9	<del>National Policy Team Briefing</del>	3/3/15	
10	<del>BLM Director's Briefing</del>		
	Interagency Leadership Briefing		
11	Secretaries of DOI and USDA Briefing	3/6/15	
	BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	3/6/15 to 3/13/15	1 week
	Camera-ready copy to GPO/PDF for website	3/13/15	
	Printing and distribution by GPO	3/13/15 to 3/27/15	2 weeks
12	Publish Proposed Plan EISs (falls on a Friday per EPA requirements)	3/27/15	
13	Protest Period Ends (30 day mandatory protest period)	4/27/15	
13a	Protest Resolution Process Ends	5/27/15	30 days
14	Governor's Consistency Review Ends (60 day mandatory governor consistency review)	5/27/15	
15	<del>National Policy Team Briefing</del>	5/28/15	
	<del>BLM Director's Briefing</del>		
	Interagency Leadership Briefing		
16	Secretaries of DOI and USDA Briefing	5/29/15	
17	RODs are signed	5/29/15	

## Attachment 5: GRSG Strike Team Roles and Responsibilities

### Greater Sage Grouse Strike Team Roles and Responsibilities

The Greater Sage Grouse (GRSG) Strike Team (ST) is being established to ensure the following outcomes are achieved with the National GRSG Conservation Strategy:

- Ensure National Policy Team guidance and management direction is consistently incorporated into the GRSG Proposed Plans/Amendments
- Ensure that the Proposed Plans/Amendments include the appropriate conservation framework and objectives
- Ensure the plans collectively result in a cohesive federal land management conservation strategy for the GRSG
- Ensure consistency with the Record of Decisions

1). GRSG Core Team – The Core Team is responsible for overall project coordination and to ensure the conservation strategy outcomes are achieved. The Core team is also responsible for coordination with the other GRSG teams, which include the Regional Project Managers, Ad Hoc, WO Planning Review and Protest teams.

GRSG Core Team	
Stephanie Carmen vice Kathy Stangl	BLM National SG Coordinator
Joe Stout	BLM Division Chief, Decision Support, Planning and NEPA
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Steve Small	BLM Division Chief, Wildlife Conservation
Vicki Herren	BLM NOC, Wildlife Biologist
Frank Quamen	BLM NOC, Wildlife Biologist, Geospatial Analyst
Kurt Wiedenmann	BLM Liaison to ASLM
Aaron Moody	SOL
Sarah Shattuck	SOL

2). GRSG Regional Project Managers

GRSG Regional Project Managers	
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
Glen Stein	Forest Service Project Manager

3). GRSG Ad Hoc Team – The Ad Hoc team will add capacity and expertise in the areas of communications, web support, planning and applied science. The team will also provide recommendations for solutions to unique situations. Specific deliverables include an internal/external communication plan.

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GRSG Ad Hoc Team	
Mitch Snow	BLM Communications/PAO
TBD	(Writer/Editor/Web Master) Ed is working with Celia, NOC and NIFC
David Batts	EMPSI
Gordon Toevs	BLM, WO AIM Coordinator
Tom Rinkes	BLM, Retired Wildlife Biologist
Mike Pellant	BLM, Retired

4). GRSG Consistency Review Team – The consistency team will be responsible for reviewing all the Administrative Draft Proposed Plans (ADPP) prior to the larger WO review. Specifically, the team will focus on consistent incorporation of National Policy Team, Federal Family meeting and other Washington Office guidance. This team will also be responsible for drafting the Record of Decisions.

GRSG Consistency Review Team	
Review Prior to formal WO Review	
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
EMPSi	TBD
Glenn Stein	Forest Service Project Manager
Development of the Records of Decisions (RODs)	
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
EMPSi	TBD
Glenn Stein	Forest Service Project Manager
Aaron Moody	SOL
Sarah Shattuck	SOL
ASLM Representative	TBD

5). GRSG WO Planning Review Team – The WO Planning Review Team members and procedures are included in Attachment 2.

6). GRSG WO Protest Team – The BLM WO Division of Decision Support, Planning and NEPA is responsible for resolving all land use planning protests. The GRSG Plans and Amendments are subject to a 30-day public protest period. The BLM must resolve all public protests before each GRSG Plan can be approved. The Forest Service will be adopting the BLM's protest resolution process to satisfy their regulatory requirements. The team will develop a protest resolution strategy.

GRSG WO Protest Team	
Michael Hildner	BLM Colorado State Office, Planning and Environmental Analyst (Proposed)
Team members	TBD
Forest Service Team members	TBD

WO GREATER SAGE-GROUSE ADMINISTRATIVE PROPOSED RMP/RMP  
 AMENDMENT AND FINAL EIS REVIEW PROTOCOL

As mentioned in the Land Managers’ Decision Document GRSG-4, the Washington Office Greater Sage-grouse Strike Team has been tasked with “reviewing the Greater Sage-Grouse RMP Amendment EISs and the relevant Greater Sage-Grouse sections of the ongoing RMP amendments and/or revisions to ensure that applicable conservation measures have been considered, as per the requirements the NTT Report and IM No. 2012-044.” The WO review will take approximately two weeks to complete. Prior to the review, you will receive an email and invitation to the WO GRSG Strike Team Kick-off Review Briefing, where the State/Field Office will brief the WO reviewers on the A-PRMP/FEIS. This Kick-off Briefing will initiate the two week WO GRSG Strike Team review period. All comments should be placed on the WO Comment Review Form, which will be linked to the Kick-off Briefing email invitation. Please email your completed comment forms to Matthew Magaletti ([mmagalet@blm.gov](mailto:mmagalet@blm.gov)) at the end of the review period.

- I. What the W O GRSG Strike Team will be looking for during their review of the A-PRMP revision or amendment

Basic RMP Review Procedures	Responsibility
Ensure that the RMP amendment/revision alternatives/proposed management actions are consistent with your program area’s laws, regulations, and policy, and are of sufficient quality to support implementation of BLM programs. WO review should focus on high-level issues concerning national policy and standards. Feel free to use Appendix C of the Land Use Planning Handbook to verify what constitutes an appropriate LUP decision for your program area.	All programs
Review “Alternatives Considered but Not Fully Analyzed” to ensure that rationale for eliminating alternatives is clear and consistent with BLM policy.	All programs
Ensure that chapter 3 and 4 uses accepted criteria, indicators, benchmarks, and methods for analysis, and describes the affected environment clearly and consistently with national policy. Please note that the planning efforts associated with GRSG are focusing on portraying the amelioration of threats to the GRSG and have used baseline information from the USGS’s Baseline Environmental Report (BER), which was conducted specifically for this effort.	All programs
Review Procedures Unique to the GR SG Review	
Are all of the proposed actions presented in the A-PRMP/FEIS sufficiently protective of GRSG such as to contribute to reducing the need to list the species under the Endangered Species Act (per IM-2012-044)?	WO-230
Are all of the BMPs addressed in the NTT Report carried forward as Required Design Features (per GRSG-7)? Focus your review on the RDFs that are specific to your program area.	All programs
Were public comments submitted on the DEIS adequately responded to in the A-PRMP/FEIS (focus specifically on the FWS/State agency comments)? Focus your review on the responses relative to your program area.	All programs
Were all unresolved issues identified during the first regional reviews addressed (per GRSG-14)?	WO-210
Does the A-PRMP/FEIS contain the following consistent National GRSG Planning Strategy components:	WO-210 & WO-230



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<ul style="list-style-type: none"> <li>• Ch. 1 section that provides the context needed to indicate how this planning effort fits into overall National GRSG Planning Strategy.</li> <li>• Population Conservation Summaries in ES or Ch. 1 (including rationale for why NPT allocation decisions were not applied to Priority or General Habitat).</li> <li>• Monitoring Framework Appendix and ch.2 introductory language.</li> <li>• Mitigation Framework and ch. 2 introductory language.</li> <li>• Ensure that the National Policy Team’s consistent allocation recommendations are presented in ch. 2. If not, ensure that there is sufficient rationale provided in the “population conservation summaries” in the Executive Summary.</li> <li>• Adaptive management ch. 2 introductory language and a management action that articulates what the hard trigger is and the related response.</li> <li>• For Great Basin amendments only– ch. 2 introductory language for wild land fire language.</li> <li>• Ch. 4 conservation effects table that ties the analysis back to the COT Report objectives.</li> <li>• Ch. 4 WAFWA MZ level CEA for GRSG (the CEA may not be completed in time for the WO review).</li> </ul>	
<p>Is the A-PRMP/FEIS adaptive management approach consistent with the national adaptive management concept paper and sideboards?</p>	<p style="text-align: center;">WO-210 &amp; WO-230</p>
<p>If the document includes Forest Service units – is this clearly articulated throughout the document?</p>	<p style="text-align: center;">WO-210</p>

II. Next Steps after the WO has submitted comments back to the BLM State Office:

WO-210 will consolidate all of the WO GRSG Strike Team comments and will submit them to the State/Field Office. The State/Field Office will then be responsible for sending back to the WO the WO Comment Review Form with their responses on how they addressed your concerns. Once the responses are sent to WO-210, you will receive an email asking you to verify whether or not your concerns have been addressed appropriately. If your concerns have been addressed and the associated revisions to the ADRMP/APRMP have been made, please email Matthew Magaletti ([mmagalet@blm.gov](mailto:mmagalet@blm.gov)) within 48 hours from receiving the email. If no email is sent to the WO, WO-210 will assume that your concerns have been adequately addressed. WO-210 will notify the State/Field Office that all of the concerns have been resolved and the State/Field office will begin scheduling a briefing with the GRSG National Policy Team (NPT). At the NPT briefing, the NPT members will make the recommendation on whether or not the PRMP can be presented to the BLM Director.

III. WO GRSG Strike Team

- Kimberly Hackett – Livestock Grazing
- Dick Mayberry – Livestock Grazing
- Ken Visser – Livestock Grazing
- Brian Novasak – Wildlife
- Vicki Herrin – Wildlife
- Travis Kern – Fluid Minerals
- Rick Deery (Backup: Mitchel Leverette) – Solid Minerals
- Jennifer Whyte– Lands and Realty

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- Brenda Wilhight – Lands and Realty
- Rob Perrin – Travel
- Dorothy Morgan – Recreation
- David Ballenger – Recreation
- Zack Reichold – WH&B
- Aaron Moody – SOL (Great Basin Region)
- Sarah Shattuck – SOL (Rocky Mountain Region)
- Jolie Pollet - Fire
- Kristy Swartz – Fire
- Bob Wick – NLCS (Wilderness)
- Doug Herrema – NLCS (National Monuments and NCAs)
- Matthew Preston – NLCS (Mitigation)
- Britta Nelson – NLCS (WSRs and Trails)
- Matthew Magaletti – Planning
- Karen Prentice – Healthy Lands
- Rob Winthrop – Socioeconomics

IV. Resources

Link to IM-2012-044 and the NTT Report:

[http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2012/IM\\_2012-044.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-044.html)

Link to GRSG Documents on the BLM GRSG Administrative Records Site:

[https://connect.doi.gov/uniqueid9a79b9d61a63982645fad83233d9ce7a/uniqueid0/InternalSite/Login.aspx?resource\\_id=A59F1E5B16ED4320A717A2AD0F62F245&login\\_type=2&site\\_name=sharepoint&secure=1&orig\\_url=https%3a%2f%2fconnect.doi.gov%2fblm%2fPortal%2fGSGrouse%2fSitePages%2fHome.aspx](https://connect.doi.gov/uniqueid9a79b9d61a63982645fad83233d9ce7a/uniqueid0/InternalSite/Login.aspx?resource_id=A59F1E5B16ED4320A717A2AD0F62F245&login_type=2&site_name=sharepoint&secure=1&orig_url=https%3a%2f%2fconnect.doi.gov%2fblm%2fPortal%2fGSGrouse%2fSitePages%2fHome.aspx)

FWS Conservation Objectives Team (COT) Report

<http://www.fws.gov/mountain-prairie/species/birds/sagegrouse/COT/COT-Report-with-Dear-Interested-Reader-Letter.pdf>

USGS Baseline Environmental Report (BER)

<http://pubs.usgs.gov/of/2013/1098/OF13-1098.pdf>

V. Final Work Review Schedule

Greater Sage -Grouse Work -PRMP/PRMP Amendment Review Schedule		
Sub-regional Planning Effort	Projected Work Two Week Review Period	Projected Publication Dates
GRSG Land Use Plan Amendments		
Nevada and NE California Sub-Regional Greater Sage-Grouse RMP	Spring 2015	PRMP/FEIS: Spring 2015 ROD: Summer 2015

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Greater Sage -Grouse WOA-PRMP/PRMP Amendment Review Schedule		
Sub-regional Planning Effort	Projected WOTwo Week Review Period	Projected Publication Dates
Amendment/EIS		
Idaho and SW Montana Sub-Regional Greater Sage-Grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Utah Sub-Regional Greater Sage-grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Oregon Sub-Regional Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Northwest Colorado Greater Sage-Grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Lewistown Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
North Dakota Greater Sage-grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Nine-Plan Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
RMP Revisions including GRS G Management		
Billings/Pompeys Pillar National Monument RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
HiLine RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Miles City RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
South Dakota RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Lander RMP/EIS	Completed, pending SOL review	<u>PRMP/FEIS</u> : February 22, 2013 <u>ROD</u> : June 20, 2014
Bighorn Basin RMP/EIS Supplement	Completed, pending SOL review	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Buffalo RMP/EIS	Completed, pending SOL review	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015

GREATER SAGE GROUSE MEETING  
NATIONAL CONSERVATION TRAINING CENTER  
SHEPHERDSTOWN, WV  
OCTOBER 20, 2014  
BLM Leadership Discussion  
9:00am – 12:00pm

Meeting objective : To discuss the remaining GRSG key issues and reach agreement on a corporate approach for our discussions with the Department in the afternoon.

- |                     |   |
|---------------------|---|
| 9:00 am             | Welcome and meeting objectives – Neil and Steve   |
| 9:15 – 10:30 am     | Review of Key Issues - Ed <ul style="list-style-type: none"><li>• Disturbance</li><li>• Mitigation</li><li>• Adaptive Management</li><li>• Vegetative Objectives</li><li>• Livestock Grazing</li></ul>  |
| 10:30 am            | Break   |
| 10:45 am – 11:30 am | Review of Key Issues – Ed <ul style="list-style-type: none"><li>• Allocations (ROWS, Corridors, Mineral Materials)</li><li>• NSO language for fluids</li><li>• Smart from the start (conservation objective for leasing and development)</li><li>• Coal Suitability</li></ul> |
| 11:30 am – 12:00 pm | Review of Key Issues – Ed <ul style="list-style-type: none"><li>• Mapping (PAC boundaries)</li><li>• Political Boundary Issues</li><li>• Buffers</li></ul>  |
| 12:00 pm – 1:00 pm  | Lunch with Department   |

## Brent Ralston

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**From:** Timothy Murphy  
**Sent:** Monday, October 20, 2014 4:12 AM  
**To:** Brent Ralston  
**Cc:** Jeffery Foss; Kurt Wiedenmann  
**Subject:** Re: GrSG Key Issue Paper and Agenda for Monday

Your timing, as usual, is spot on Brent. The thought, time, and material you've sent is very helpful. Thank you!

Tim

Sent from my iPad

On Oct 20, 2014, at 12:47 AM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Tim,

Here is some more or supplemental information regarding the issues to be discussed:

Disturbance – We discussed our disturbance approach at last Thursday's meeting and seemed to be met with understanding and support (or at least no lack of support) from Sarah Greenberger and Jim Lyons. I have shared our detailed description with Jim and Sarah (cc'ed you and Jeff as well) based on their request.

Mitigation – we have similar language in our current ADPP, I will look at this language to see if we need to adjust anything but the intent is similar.

Adaptive Management – looks like Idaho is to continue in the direction we are working. We need to discuss untripping triggers to respond to USFWS and we will do that this week or next.

Vegetation Objectives – we have objectives in this format in our ADPP.

Livestock Grazing – the priority setting described is similar to what we have in our ADPP, the annual compliance monitoring may be new language for us – I'll check and include.

Transmission – our General areas are not identified as avoidance; however, we still require the RDFs in those areas.

Minerals Materials – looks like the new language has been adjusted to line up more with what we already had in Idaho – I'll check specific language to make sure.

NSO – I believe our plan is consistent with this approach, I need to check language to ensure but will make any adjustments to our language needed to be consistent.

Fluid Mineral – that is language not currently included in our ADPP but can easily be incorporated.

Coal – Not applicable in Idaho or sw Montana.

Mapping – Not applicable to Idaho, we have our own mapping direction.

Buffers – Idaho provided our buffers, backed by the best available science to WO for review, this is a piece that USGS is looking at – we don't expect many, if any changes to our buffers.

Schedule – we are ready to send updated data; there are several pieces of the ADPP we need to resolve and that will be completed by the end of the month. The remaining timeframes match or even extend the timeframes I've been operating under and have communicated with our ID Team, so these should be doable without additional extension from Idaho/swMT.

WO Strike Team – no additional comments.

Plan Consistency – these formats have been/will be provided to EMPSi to they can do that writer/editor work of putting our ADPP into the appropriate format.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

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**From:** Timothy Murphy [mailto:[tmurphy@blm.gov](mailto:tmurphy@blm.gov)]  
**Sent:** Sunday, October 19, 2014 9:11 PM  
**To:** Jeffery Foss; Brent Ralston  
**Subject:** Fwd: GrSG Key Issue Paper and Agenda for Monday

I assumed, wrongly mind you, that Jeff was included in the addressing as in past material from Ed. Looking this over I think I'm prepared for the meeting tomorrow, Monday. 0900 to 1200 BLM, 1 - 4 BLM and DOI

Sent from my iPad

Begin forwarded message:

**From:** "Roberson, Edwin" <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** October 17, 2014 at 7:17:10 PM EDT  
**To:** James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, "Perez, Jerome E" <[jperez@blm.gov](mailto:jperez@blm.gov)>, "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Jamie Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, "Simpson, Donald A" <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Ronald Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Michael Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>  
**Cc:** Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, Kathryn Stangl <[kstangl@blm.gov](mailto:kstangl@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Jessica Camargo <[jcamargo@blm.gov](mailto:jcamargo@blm.gov)>, Jamie Harrison <[jharriso@blm.gov](mailto:jharriso@blm.gov)>, Joanne Maluotoga <[jmaluoto@blm.gov](mailto:jmaluoto@blm.gov)>, Judith Frye <[jfrye@blm.gov](mailto:jfrye@blm.gov)>, Annette Fournier <[afournie@blm.gov](mailto:afournie@blm.gov)>, Kathy Mondor <[kmondor@blm.gov](mailto:kmondor@blm.gov)>, Samuel Herbert <[sjherber@blm.gov](mailto:sjherber@blm.gov)>, Stella Portillo <[sportill@blm.gov](mailto:sportill@blm.gov)>, Toni Rohm <[trohm@blm.gov](mailto:trohm@blm.gov)>  
**Subject:** GrSG Key Issue Paper and Agenda for Monday

Dear Sage-grouse SDs, Mike and Ron,

I am getting ready to go home for the day and wanted to send you the agenda and some more reading material for our discussions on Monday.

Joe sent you out three papers yesterday for your review. I have attached a paper that includes the 12 key remaining issues that were discussed last week in our meeting with the states representatives in Denver. The paper highlights each issue and provides either the direction we will proceed with or recommendations for discussion and decision. The paper also has 5 attachments including: a Disturbance white paper, GrSG Land use plan objectives guidance, guidance for incorporating GrSG RMP decisions into grazing authorizations, an updated draft planning schedule, and a paper on the roles and responsibilities for a GrSG strike team process with steps to get us to the ROD. The discussion in the morning will help us prepare for the afternoon meeting.

As the first agenda shows, we will discuss these on Monday morning between 9 and 12. Then we will go to lunch and meet up with Sarah, Jim and Bret. The afternoon provide time for Sarah and Jim to discuss the status of the one-on-one meetings with the states; to share with Sarah, Jim and Bret where BLM is with the 12 remaining key issues; and to have a discussion about next steps. This is where we will discuss the planning schedule, strike teams, our approach on the input into the conservation efforts data base and stakeholder outreach.

Hopefully Sarah, Jim and Bret will be able to hang around for dinner and some social time with our ELT members before returning to DC. But that is not the end of our fun GrSG day. Amy and I want to meet with you all again after dinner for a discussion related to Plan Implementation. Our resources DSDs met a few weeks ago on this and we need to discuss some key aspect of implementation and begin to make some key decisions about approaches. On Monday morning we will hand out some information developed by the DSDs to help us focus our discussion on what the plan implementation workload will be and to help us discuss how to organize it. I know that you all will be tired at the end of the day. Unfortunately there's no rest in sight for a while. Monday will help us insure we are all in alignment and on the page as we move to completion of our proposed plans, then to the signing of the RODs and finally to implementing the plans effectively across the range.

Thank you all for all you and your teams have done to date. See you Monday. ed

## Brent Ralston

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**From:** Foss, Jeffery  
**Sent:** Monday, October 13, 2014 5:35 PM  
**To:** Brent Ralston  
**Subject:** Fwd: SG Fed-State MeetingFollow-up information  
**Attachments:** ADPP Compliance with NPT Guidance\_9\_23\_14 (1).docx;  
GreatBasin\_ADPP\_NPT\_Compliance\_Atlas\_v2.pdf;  
RockyMountain\_ADPP\_NPT\_Compliance\_Atlas\_v2.pdf

FYI

----- Forwarded message -----

From: **Roberson, Edwin** <[eroberso@blm.gov](mailto:eroberso@blm.gov)>

Date: Fri, Oct 10, 2014 at 3:37 PM

Subject: SG Fed-State MeetingFollow-up information

To: "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, Jamie Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, "Simpson, Donald A" <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Michael Haske <[mhaske@blm.gov](mailto:mhaske@blm.gov)>, Nancy Haug <[nhaug@blm.gov](mailto:nhaug@blm.gov)>, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Lauren Mermejo <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)>  
Cc: James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, "Perez, Jerome E" <[jperez@blm.gov](mailto:jperez@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Kathryn Stangl <[kstangl@blm.gov](mailto:kstangl@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, James Lyons <[james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov)>

Hello,

First of all thank you all for taking the time to participate in the meeting with the FWS and the States on Weds. We felt that it was a productive meeting and look forward to meeting the State Representatives at our upcoming one-on-one meetings.

After our Weds. meeting a number of you, along with Neil, Steve and myself to discuss the upcoming SD meeting on October 20th at NCTC. There we plan to discuss where we are with our planning efforts and how to move forward to address the remaining concerns of FWS as it relates to our plans for Greater Sage-grouse habitat conservation. We will provide you with a revised draft planning schedule at our meeting on the 20th as this is very dependent on the decisions we make in the upcoming weeks. We are currently working on the draft agenda for the GrSG discussion. We will likely focus on the Key Remaining Issues as discussed by Neil and Jim at our meetings this week and the steps to complete our proposed plans. The key issues remaining include:

1. PAC Boundaries
2. Addressing Issues Related to Political Boundaries
3. Disturbance Tracking & Setting of Limits
4. Monitoring/ Adaptive Management
5. Mitigation
6. "Mixed" management landscapes (ownership)
7. Lek Buffers
8. ROWs
9. Priority Habitat, NSO, Closures, ACECs, Withdrawals
10. Coal Suitability
11. Livestock Grazing
12. Smart for the Start (related to oil and gas)



You all also asked on Weds night for some additional information on allocations in order to prepare. Attached are the requested maps that the NOC prepared for us that show where we are in compliance with the allocations and where we are not. It is deliberative and pre-decisional, based on the preliminary data your planning team provided, so keep that in mind if you are considering sharing. I have also included a table that addresses explains the deviations in allocations from NPT direction.

Some of you all also requested the follow up action charts from the two Federal Family meetings. I will be sending out in a separate email.

Let me know if you have any questions. Have a great 3 day weekend. Thanks! Ed

--

**Jeff Foss**  
**Deputy State Director- Resources, Idaho BLM**  
**1387 S. Vinnell Way, Boise, ID 83709**  
**208-373-3800**  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

Compliance with NPT Guidance								
	NPT Guidance	MT ADPPs	Wyoming ADPPs	NW CO	Utah	NV/NE CA	Oregon	Idaho/SW MT
Solar - Priority	Exclusion	Exclusion	NA <sub>6</sub>	Exclusion	Exclusion	Exclusion	Exclusion	Exclusion Imp – Avoid.
Solar – General	Avoidance	Avoidance	NA <sub>6</sub>	Avoidance	Exclusion	Exclusion	Avoidance	Open Imp – Open Screening process
Wind – Priority	Exclusion	Exclusion	Avoidance <sub>7</sub> Consistent with WY Core Area Strategy	Exclusion	Exclusion	Exclusion	Exclusion	Exclusion Imp – Avoid.
Wind – General	Avoidance	Avoidance	Open Consistent with WY Core Area Strategy	Avoidance	Open Only 32 males in General	Exclusion	Avoidance	Open Imp – Open Screening process
Major ROWs - Priority	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance Imp - Avoid
Major ROWs - General	Avoidance	Open <sub>5</sub> Mixed Ownership Pattern - Screen	Open Consistent with WY Core Area Strategy	Open <sub>12</sub> Mixed Ownership Pattern	Open Only 32 males in General	Avoidance	Avoidance	Open Screening process
Minor ROWs – Priority	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance	Avoidance Imp - Avoid
Minor ROWs – General	Open	Open <sub>4</sub>	Open	Open	Open	Avoidance	Open	Open
Fluids – Priority	NSO	NSO <sub>3</sub>	Open with major/moderate constraints <sub>8</sub>	NSO <sub>10</sub>	NSO	NSO	NSO	NSO Imp - NSO
Fluids – General	Open with Moderate constraints	Open with Moderate constraints	Open with standard/moderat e constraints	Open with Moderate constraints <sub>10</sub>	Open with Standard Constraints Only 32 males in General	NSO	Open with Moderate constraint <sub>513</sub>	Open with Moderate constraints
Non-energy Leasables - Priority	Closed	Closed <sub>2</sub>	Open <sub>9</sub>	Closed	Closed	Closed	Closed	Closed Imp - Open
Non-energy Leasables - General	Open	Open <sub>2</sub>	Open	Open	Open	Closed	Open	Open
Mineral Materials – Priority	Closed	Open <sub>1</sub> Mixed Ownership Pattern - Screen	Open Consistent with WY Core Area Strategy	Open <sub>11</sub> 2-miles from a lek are closed	Closed	Closed	Closed	Closed Imp - Open
Mineral Materials – General	Open	Open	Open	Open	Open	Closed	Open	Open

- 1 – Billings and North Dakota are the only ADPP in MT that is closed to mineral materials in priority habitat.
- 2 – Miles City and Billings have no known non-energy leasables potential, therefore, no LUP allocations were made for this resource.
- 3 – For the Lewistown Amendment, the planning area is currently under protest resolution; therefore, oil and gas leasing will not be addressed in this LUP amendment.
- 4 – Billings is the only ADPP in MT that is avoidance to minor ROWs in general habitat.
- 5 – Billings is the only ADPP in MT that is avoidance to major ROWs in general habitat.
- 6 – For all WY plans, solar was not analyzed in the DEISs.
- 7 – Lander is the only planning area to exclude wind in PH (Core).
- 8 – Related to Fluid Minerals in Core Habitat – NPT guidance provided WY plans with an exception.
- 9 – Related to non-energy leasables in Core Habitat – NPT guidance provided WY plans with an exception.
- 10 – In NWCO – Areas within 1-mile of an active lek are closed to leasable minerals. Areas within 2-miles of an active lek would be NSO (no exceptions). Areas outside of this area in general habitat is subject to existing lease constraints.
- 11 – In NWCO, only areas within 2-miles of an active lek are closed to mineral materials.
- 12 – In NWCO, avoidance extends into GH if within 4-miles of an active lek. No new roads or above-ground structures would be authorized within 1 mile of an active lek.
- 13 – In OR for GH, open with moderate constraints (CSU/TLs) with 1 mile NSO around leks

**Brent Ralston**

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**From:** Zwang, Cheryle  
**Sent:** Friday, January 30, 2015 10:09 AM  
**To:** blm\_id\_pao\_plus@blm.gov; Brent Ralston; Paul Makela; BLM\_ID\_ILT  
**Subject:** Fwd: New: Greater Sage-Grouse talking points  
**Attachments:** Greater Sage Grouse Talking Points Jan 29.docx

According to the attached talking points on sage grouse, State Directors are on point for speaking with the media on this subject. I am sure we will hear more about this at the ILC next week. Thanks, Cheryle

*Cheryle Cobell Zwang*

*Idaho Bureau of Land Management*

*Deputy State Director, Communications*

*Ph: 208/373-4016/ Fax: 208-373-4019 / Email: [czwang@blm.gov](mailto:czwang@blm.gov)*

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From: **Krauss, Jeff** <[jkrauss@blm.gov](mailto:jkrauss@blm.gov)>  
Date: Thu, Jan 29, 2015 at 3:49 PM  
Subject: New: Greater Sage-Grouse talking points  
To:

External Affairs Chief and Backups,

Please see below. Thanks.

Jeff

----- Forwarded message -----

From: **Boddington, Celia** <[cbodding@blm.gov](mailto:cbodding@blm.gov)>  
Date: Thu, Jan 29, 2015 at 4:46 PM  
Subject: Greater Sage-Grouse talking points  
To: BLM\_ELT <[BLM\\_ELT@blm.gov](mailto:BLM_ELT@blm.gov)>, BLM\_Field\_Comm <[blm\\_field\\_comm@blm.gov](mailto:blm_field_comm@blm.gov)>

All --

As mentioned on recent calls, we've been coordinating with DOI on updated talking points (attached) for use in outreach on our land use plans for the Greater Sage-Grouse. We will also share them with your comm leads.

Please let us know if you have any questions.

Thanks,

Celia

Status Update on BLM Land Use Plans for Greater Sage-Grouse  
Internal Working Document  
January 29  
Talking Points for use by State Directors

State Directors should be the point on communication with media within the state. Please pass these talking points on to your district and field managers to ensure they have consistent communication.

Talking Points

- The BLM's multiple use and sustained yield mission requires us to find a balance between the full range of resources, including the conservation of crucial wildlife habitat, and resource uses. These principles have driven the development of BLMs conservation planning strategy for greater sage-grouse and its habitat.
- Our planning process has been complex and highly collaborative with meaningful coordination with the public serving as the cornerstone. Throughout the process, we have worked closely with a broad range of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service, the U.S. Forest Service and many others.
- Working with our partners, as we move from draft plans to final, the BLM and USFS are resolving key issues (like disturbance limits and mitigation approaches) and are moving to complete our proposed land use plans/final EISs by late spring, and the records of decision by late summer.
- We have confidence these plans when final will help ensure the long-term viability of the greater sage-grouse and other iconic wildlife species on public lands and the continued economic vitality of the West.
- Strong Federal land use plans (BLM and USFS), however, will only get us part of the way in ensuring the long-term conservation of greater sage-grouse and avoid the need to list under the Endangered Species Act.
- One third of sage-grouse habitat is administered by the states or is privately-owned. For this reason, strong State plans as well as an effective strategy to reduce the risk of fire to greater sage-grouse habitat are key components of the range-wide strategy. We are continuing our collaboration with our state and federal partners as well as private landowners to ensure all components of a range-wide strategy are in place.
- Together we can ensure listing of the greater sage-grouse is no longer warranted while preserving traditional Western economic activity that is also dependent on a healthy sagebrush range.

### Key Elements to Land Use Plans:

- We are implementing key elements of the planning effort, which will enable us to achieve greater clarity and consistency across the range while honoring specific local approaches and conditions.
- Key elements addressed include:
  - Limiting or eliminating new surface disturbance in sage-grouse priority habitat and minimizing additional disturbance in general habitat.
  - Improving greater sage-grouse habitat condition
  - Reducing the threat of rangeland fire to greater sage-grouse in the Great Basin by placing added priority prevention, suppression and restoration of sagebrush landscapes threatened by rangeland fire through improved federal-state-local collaboration and coordination.

## Brent Ralston

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**From:** Timothy Murphy  
**Sent:** Monday, January 19, 2015 10:17 AM  
**To:** Peter Ditton; Jeffery Foss; Johanna Munson; Jonathon M Beck; Brent Ralston  
**Subject:** Fwd: Today's Call  
**Attachments:** Issues Resolved\_ID 1.19.15.docx; Instructions for Submitting FINAL ADPP Data Layers.docx; EIS\_GRSB\_ADPP\_TierIIIEA\_DataDeliveryTrackingForm.xlsx

Ed's note and attached

Sent from my iPhone

Begin forwarded message:

**From:** "Carman, Stephanie" <[scarman@blm.gov](mailto:scarman@blm.gov)>  
**Date:** January 19, 2015 at 9:28:11 AM MST  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Cc:** Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Peter Ditton <[pditton@blm.gov](mailto:pditton@blm.gov)>, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Subject: Re: Today's Call**

Per Ed's email this morning, attached is the proposed direction for the Idaho ADPP, as well as the direction for the cumulative effects analysis and the tracking table for your project lead and GIS specialists.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Mon, Jan 19, 2015 at 8:32 AM, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:  
Dear Sage-Grouse SDs,

Title: Sage Grouse State Director Task Force Coordination Meeting - [\(866\) 506-1142](tel:8665061142) - P/C 444397#

When: Mon Jan 19, 2015 4pm - 5pm Eastern Time

I wanted to provide some context for today's call.

We have concluded the majority of our discussions with individual states, FWS and the Department to develop supplemental guidance for your planning efforts to help achieve the clarity and consistency as we move to development of the proposed plans. Today I will send each of you a resolved issue summary personalized for your state that has final direction on land use allocations, Sagebrush Focal Areas, Mitigation, Disturbance, Vegetation Management, Livestock Grazing,



Adaptive Management, Application of Lek Buffers and a few other issues.

We will be discussing these concepts and products at the Governor's Task Force meeting in Denver tomorrow and Wednesday we will advise the governors representatives from your states know that you have received detailed information. We anticipate that you will get with these individuals after they return from the meeting to discuss questions and concerns.

I will be sending you all direction for the development and submission of the cumulative effects analysis data. As it was in May when we prepared for the roll up analysis, it is imperative that this information is submitted as soon as possible and in complete form. There will be a meeting of our geospatial folks and regional project managers this week in Denver to discuss this process as well. We will discuss a few other next step items this afternoon. Look for an email from me or Stephanie in a few hours with your state specific document so you can give it a quick review before the call. Thx. Ed

Sent from my iPad

# INSTRUCTIONS FOR SUBMITTING FINAL ADMINISTRATIVE DRAFT PROPOSED PLAN DATA LAYERS FOR THE GRSG PLANNING EFFORT

**I. ADPP Data definition:** Administrative Draft Proposed Plan (ADPP) data have gone through regional review and reflect the decisions in the ADPP document. The ADPP data comport with the national direction outlined by the BLM WO (January 2015). These data will be used for both the Tier II Cumulative Effects Analysis and Landscape Report. Additionally, these data will be shared with the FWS for use in helping to make a listing decision.

## II. Steps for EISs:

1. Please follow the protocols used in the delivery of No Action through Proposed data (i.e. folder structure, naming conventions, etc.) that were agreed to by the Data Management Team
2. Determine which data layers already submitted to NOC will not change (and note in the tracking spreadsheet)
3. Make needed changes based on data errors detected since the last data delivery
4. Make needed changes based on management decisions from WO
5. Provide a pdf of each program area decision data to EIS Project Leads, State Office ASDs, DSDs, and Regional Project Managers for assistance in reviewing the data
6. Provide approval notification to WO (Stephanie Carman) & NOC (Frank Quamen) after review by EIS Project Leads and State Office ASDs/DSDs
7. Provide approval notification to WO & NOC after review by Regional Project Managers
8. Once data layers have been approved, completely fill out the tracking spreadsheet to note new data delivery, data that have not changed from last submission, and decision categories for which there are no data
9. Submit data to the NOC (all at one time; to Frank Quamen, Anthony Titolo, and Alisa Froistad) along with the tracking spreadsheet documenting the delivery status of all data
10. Respond to QA/QC fails at your earliest convenience, as any corrections needed will delay delivery to the FWS and completion of the CEA

## III. Data Submission/Delivery Deadlines:

- 2/17/15 Submission to Regional Project Managers for review
- 2/20/15 Submission to the NOC
- 3/20/15 Submission to the FWS (assuming all EISs pass QA/QC; If submissions do not pass QA/QC the deadline will be extended to one month after the EIS submits all datasets correctly)

**IV. Data Requirements:** Data have typically failed QA/QC for five reasons. The following rules must be followed:

- A. **DO** use the folder structure, naming conventions, and categories that the Data Management Team agreed to. Variations of names and additional categories will NOT be accepted.
- B. **DO** clip your data to your EIS area. Data should not spill over into other EIS areas or they will create overlapping data which cannot be processed. You must use the common EIS boundaries that were submitted by the Planning Leads.
- C. **DO** clip your data to where we have management authority (Decision data must only be shown only where we have the authority to make management decisions, e.g. BLM surface and/or subsurface, USFS lands).
- D. **DO NOT** clip your data to habitat (e.g., priority habitat, general habitat, priority management areas, PACs, or anything related to habitat). Decision data must cover your entire planning area. We can clip the data here at the NOC if we need to display it only within habitat management types on maps.
- E. **DO NOT** allow any overlaps between decision categories within a program/subject area (e.g., the four Oil and Gas decision categories should never overlap).

***BLM-IDAHO***

**Greater Sage-Grouse Planning Issues for the BLM Planning Teams to Insert and Analyze in Administrative Draft Proposed Plan (ADPP)**

**January 19, 2015**

*The March 4, 2010 decision by the U.S. Fish and Wildlife Service that the greater sage-grouse warranted listing but was precluded [Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to list the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered] set in motion the most comprehensive land-use planning initiative in the BLM's history.*

*In 2011, the BLM began updating land-use plans across the West so as to ensure not only the long-term viability of the greater sage-grouse on public lands and the continued economic vitality of the West. This has been a complex and demanding process involving collaboration with an unprecedented number of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service and many others. The BLM's mandate of multiple use and sustained yield has required us to balance the full range of resource uses on public lands, including the conservation of crucial wildlife habitat. As we have worked through this process, public land managers throughout the BLM have made difficult resource management decisions.*

*These documents provide key guidance that will enable the BLM to finalize land use plans that will contribute to the conservation of the Greater Sage-Grouse and other sagebrush associated species across the West. The guidance outlines a suite of tools, such as disturbance limits in key habitats and mitigation approaches, which will help us to reach this goal. These mechanisms will work in concert to conserve sage-grouse habitat so that we can achieve our twin goals of thriving Greater Sage-Grouse populations and robust Western economies.*

***Issue:***

**Development in Highly Important Landscapes**

***Direction:***

The BLM will designate Sagebrush Focal Areas (SFAs) consisting of the BLM-managed lands within the area depicted in the October 27, 2014 USFWS memo, *Greater Sage-Grouse: Additional Recommendation to Refine Land Use Allocations in Highly Important Landscapes*. The ADPP will reflect the following management guidance for the SFAs:

- 1) The ADPP will recommend administrative withdrawals from the 1872 Mining Law (locatable minerals) in SFAs, subject to valid existing rights.
- 2) These areas will be NSO, without exceptions, for oil and gas development.
- 3) The BLM will prioritize management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases.

**Issue:** **Mitigation**  
**Direction:** The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and assure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:** **Mapping**  
**Direction:** Not Applicable

**Issue:** **Disturbance**  
**Direction:** Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance.

**Issue:** **Vegetation Objectives**  
**Direction:** The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment II for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP.

**Issue:**

**Livestock Grazing**

**Direction:**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*
- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

**Issue:**

**Mineral Materials (Salable Minerals)**

**Direction:**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

**Issue:** **High-voltage Transmission and Major Pipeline ROWs and Corridors**

**Direction:**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures, avoidance criteria, and RDFs outlined in this document [list the criteria/RDFs].”*

**Issue:**

**Direction:**

**Coal Suitability**

Sub-regions will include the following management action:

*“At the time an application for a new coal lease or lease modification is submitted to the BLM, the BLM will determine whether the lease application area is "unsuitable" for all or certain coal mining methods pursuant to 43 CFR 3461.5. PHMA is essential habitat for maintaining GRSG for purposes of the suitability criteria set forth at 43 CFR 3461.5(o)(1).”*

**Issue:**

**Direction:**

**Fluid Mineral Resources (Including Geothermal)**

All ADPPs will include the conservation objective for leasing and development outside of GRSG habitat:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable*

*stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h)."*

*"Where a proposed oil and gas or geothermal project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce oil and gas or geothermal resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases."*

**Issue:**  
**Direction:**

**No Surface Occupancy (NSO) Exception Language**

Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new oil and gas leases at the time of leasing only and may not be applied to existing oil and gas leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*No waivers or modifications to an oil and gas lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to an oil and gas lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal oil and gas lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly."*

**Issue:**

**Adaptive Management**

**Direction:**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

**Issue:**

**Application of Lek Buffers**

**Direction:**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment X) through this drop-in Chapter 2 language:

*"In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review ([Open File Report 2014-1239](#)) in accordance with Attachment X."*

Buffer Attachment

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*



Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* (Open File Report 2014-1239). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

- linear features (roads) within 3.1 miles of leks
- infrastructure related to energy development within 3.1 miles of leks.
- tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
- low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
- surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
- noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as Conditions of Approval to fully address the impacts to leks as identified in the NEPA analysis.

- Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
- If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
  - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater level of protection to GRS and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
  - Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).
- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as Conditions of Approval to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<i>Idaho/SW MT*</i>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion Imp – Avoid
<b>Wind – General</b>	Open Screening process
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open

## Attachment I

# GREATER SAGE-GROUSE RMPA/FEIS TEMPLATE LANGUAGE FOR ADDRESSING MITIGATION

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

## Chapter 1 - Introduction

[Nothing new to add to EIS]

## Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and assure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

## Mitigation

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and assure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.

avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and

compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and assure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.



- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- **Compensatory Mitigation Options**
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- **Compensatory Mitigation Siting**
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- **Compensatory Mitigation Project Types and Costs**
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- **Compensatory Mitigation Compliance and Monitoring**
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

**Durability (protective and ecological):** the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

#### **Guidance**

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment III

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in

grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

**Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).



help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSG RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSG habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSG habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

## Brent Ralston

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**From:** Murphy, Timothy  
**Sent:** Friday, January 23, 2015 4:46 PM  
**To:** Munson, Johanna  
**Cc:** Jeffery Foss; Ralston, Brent E; Jonathon M Beck; Peter Ditton  
**Subject:** Re: Today's Call

## Sounds like a plan for moving ahead with our partners

On Fri, Jan 23, 2015 at 4:41 PM, Munson, Johanna <[jmunson@blm.gov](mailto:jmunson@blm.gov)> wrote:

Hi all - based on the conversation today with WO and SG SDs, it looks like our next step is to follow up with our state partners regarding the final proposed plan decisions and additional 10+ issues described in the WGA PPT presentation. Recommend we put a meeting together with them in early February. Will get together with Brent and Jon next week to review where we have ended up on key issues and scope out potential date/times on different calendars and an agenda.

We will also be planning for next Thursday's in person meeting with Regional and local FWS folks related to the ID disturbance calculation methodology.

Keep the faith and have a great weekend!

On Fri, Jan 23, 2015 at 3:59 PM, Murphy, Timothy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)> wrote:

----- Forwarded message -----

**From:** Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)>  
**Date:** Fri, Jan 23, 2015 at 3:45 PM  
**Subject:** Re: Today's Call  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Cc:** Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Peter Ditton <[pditton@blm.gov](mailto:pditton@blm.gov)>, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>

Attached is the updated guidance Ed referenced on today's call. Please keep this close hold until the talking points and schedule are finalized on Monday. Let me know if you have any questions.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Mon, Jan 19, 2015 at 11:28 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Per Ed's email this morning, attached is the proposed direction for the Idaho ADPP, as well as the direction for the cumulative effects analysis and the tracking table for your project lead and GIS specialists.

**Stephanie Carman**

Bureau of Land Management

Sage-Grouse Project Coordinator (Acting)

office 202-208-3408

mobile 202-380-7421

[scarman@blm.gov](mailto:scarman@blm.gov)

On Mon, Jan 19, 2015 at 8:32 AM, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:

Dear Sage-Grouse SDs,

Title: Sage Grouse State Director Task Force Coordination Meeting - [\(866\) 506-1142](tel:(866)506-1142) - P/C  
444397#

When: Mon Jan 19, 2015 4pm - 5pm Eastern Time

I wanted to provide some context for today's call.

We have concluded the majority of our discussions with individual states, FWS and the Department to develop supplemental guidance for your planning efforts to help achieve the clarity and consistency as we move to development of the proposed plans. Today I will send each of you a resolved issue summary personalized for your state that has final direction on land use allocations, Sagebrush Focal Areas, Mitigation, Disturbance, Vegetation Management, Livestock Grazing, Adaptive Management, Application of Lek Buffers and a few other issues.

We will be discussing these concepts and products at the Governor's Task Force meeting in Denver tomorrow and Wednesday we will advise the governors representatives from your states know that you have received detailed information. We anticipate that you will get with these individuals after they return from the meeting to discuss questions and concerns.

I will be sending you all direction for the development and submission of the cumulative effects analysis data. As it was in May when we prepared for the roll up analysis, it is imperative that this information is submitted as soon as possible and in complete form. There will be a meeting of our geospatial folks and regional project managers this week in Denver to discuss this process as well. We will discuss a few other next step items this afternoon. Look for an email from me or Stephanie in a few hours with your state specific document so you can give it a quick review before the call. Thx. Ed

Sent from my iPad

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Timothy M Murphy  
Idaho State Director  
Bureau of Land Management  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270

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Johanna Munson  
Acting Branch Chief, Resources and Science  
Idaho State Office  
Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

Office: 208-373-3813  
Fax: 208-373-3805  
Email: [jmunson@blm.gov](mailto:jmunson@blm.gov)

--

Timothy M Murphy  
Idaho State Director  
Bureau of Land Management  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270

## Brent Ralston

---

**From:** Timothy Murphy  
**Sent:** Sunday, January 18, 2015 12:56 PM  
**To:** Brent Ralston  
**Subject:** Fwd: Idaho disturbance protocol

Brent, my email to Jon Beck keeps coming back as undelivered. Any comment on Gordon's note?

Sent from my iPhone

Begin forwarded message:

**From:** Gordon Toevs <[gtoevs@blm.gov](mailto:gtoevs@blm.gov)>  
**Date:** January 18, 2015 at 12:43:50 PM MST  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Cc:** Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>, Jeffery L Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Brent E Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>  
**Subject: Re: Idaho disturbance protocol**

Tim

I agree I thought this was resolved. From my view point, ID is a model as it not only incorporates the actual disturbance, it incorporates the density (quality) of the habitat and if the density is lower the disturbance is less than 3%. (Tim, please correct if I did not characterize this correctly.) We had an separate call with ID on this issue months ago but I do not recall who from FWS was present.

Hope this helps

Gordon

Sent from my iPhone

On Jan 18, 2015, at 11:35 AM, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)> wrote:

Yes absolutely Ed, Mike Carrier has kept the Portland folks well informed and they are all on board. Portland does not seem to be the issue. This matter was addressed and resolved months ago and, Mike confirmed it was addressed and agreed to with no issue again last week in Denver at the FWS face to face meeting.

Something is very strange about this. Mike Carrier has consistently addressed this up through his bureau and confirmed months back, again last week, and again this morning that it is resolved at FWS.

We are about to leave cell service. I will ensure Jeff and the BLM Idaho crew are aware of this.

Tim

Sent from my iPad

On Jan 18, 2015, at 6:58 AM, Edwin Roberson  
<[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:

Brent and Jeff,

Noreen is reading our remaining issues document today and got to the point where we say Idaho has a slightly different disturbance and density calculation process. I told her you all worked with FWS on it.

Pat Deibert told her she's not aware of it and she thought there was one agreed to process for all (ex WY). Noreen is reaching out to Region 1. Has Mike (FWS) kept the Portland folks in the loop. We have a call with the department this afternoon at 5. I don't want a hiccup. Please let us know if you can. Thanks. Ed

**Brent Ralston**

---

**From:** Timothy Murphy  
**Sent:** Monday, January 19, 2015 8:45 AM  
**To:** Jeffery Foss  
**Cc:** Edwin Roberson; Johanna Munson; Peter Ditton; Brent Ralston; Jonathon M Beck; Stephen Small  
**Subject:** Re: GRSG: ID disturbance calc methodology

Likewise Ed. The goal line is in sight, thank you for keeping the play moving forward.

Tim

Sent from my iPhone

On Jan 19, 2015, at 8:40 AM, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)> wrote:

Excellent  
Ed, thanks for the good coordination!  
Jeff

Sent from my iPhone

On Jan 19, 2015, at 8:39 AM, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:

Thank you all. Noreen got the answer she needed. The issue was not raised by Dan. All should be fine. Ed

On Jan 19, 2015, at 10:05 AM, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)> wrote:

As noted in the email below, the FWS at the Portland Regional Office (Asst Regional Director Terry Rabot) confirms their support for Idaho's Disturbance calculation. This was also confirmed at last falls meeting in the Govs conf room with Carrier, Hannan, Greenberg, and Lyons.

This appears to be a communication issue at higher levels in the FWS

Jeff

Sent from my iPhone

Begin forwarded message:

**From:** "Mackey, Dennis"  
<[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)>  
**Date:** January 19, 2015 at 7:55:07 AM MST  
**To:** Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Tim Murphy  
<[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>



**Subject: Fwd: GRSG: ID disturbance calc methodology**

Tim and Jeff:

I'm around today if you need my help. Call my cell 208 860 1970.

Dennis

----- Forwarded message -----

From: **Theresa Rabot** <[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)>

Date: Monday, January 19, 2015

Subject: Fwd: GRSG: ID disturbance calc methodology

To: Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)>

Cc: Richard Hannan <[richard\\_hannan@fws.gov](mailto:richard_hannan@fws.gov)>, pat deibert <[Pat\\_Deibert@fws.gov](mailto:Pat_Deibert@fws.gov)>, Matt Kales <[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)>, Michael Thabault <[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)>, "nicole alt@fws.gov" <[nicole\\_alt@fws.gov](mailto:nicole_alt@fws.gov)>, "Mr. Jesse DElia" <[Jesse\\_DElia@fws.gov](mailto:Jesse_DElia@fws.gov)>, Dennis Mackey <[Dennis\\_Mackey@fws.gov](mailto:Dennis_Mackey@fws.gov)>, Mike Carrier <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>

<[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)>, Michael Thabault <[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)>, "nicole alt@fws.gov" <[nicole\\_alt@fws.gov](mailto:nicole_alt@fws.gov)>, "Mr. Jesse DElia" <[Jesse\\_DElia@fws.gov](mailto:Jesse_DElia@fws.gov)>, Dennis Mackey <[Dennis\\_Mackey@fws.gov](mailto:Dennis_Mackey@fws.gov)>, Mike Carrier <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>

<[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>

I believe 3% is consistent however there are differences within that, for example Oregon is 1% per decade. I've reached out to mike and Denis, perhaps they can arrange for Brent to do a quick phone briefing.

Sent from my iPhone

On Jan 18, 2015, at 5:45 AM, Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)> wrote:

Dear friends,

We will need to circle our internal wagons on this issue. I heard this past week, and confirmed yesterday, that ID was using a different disturbance calculation method. To my knowledge, I never had heard that before (yet I am the first to acknowledge my memory is not perfect). I thought we had agreed to 3% with one methodology across the

range. When I asked Ed Roberson this weekend WHY ID is using a different methodology to calculate disturbance, he replied:

*“Idaho has a far more detailed method that they worked out with Mike and Virgil. Brent explained it when we were in the Governors office.*

*It factors in more of disturbance variables from the research. If you want more info we reach out to Brent.”*

I had also reached out to Pat who has seen some (all?) of the ID process and has a potential concern.

So, I think what we need to wrestle with is the following:

Was this process described in the ID alternative that Richard indicated at the last TF meeting we support? As in, have we already indicated as an agency we support it?

Is any potential concern about the outcome of the process significant such that we should raise it now?

Can you all confer to provide a consensus recommendation? Thank you,

Noreen

Noreen Walsh

Regional Director

Mountain-Prairie Region

U. S. Fish and Wildlife Service

303 236 7920

--

Dennis Mackey  
Deputy State Supervisor  
U.S. Fish and Wildlife Service  
Boise, Idaho  
Office: 208-378-5267  
Cell: 208-860-1970

**Brent Ralston**

---

**From:** Timothy Murphy  
**Sent:** Monday, January 19, 2015 10:18 AM  
**To:** Peter Ditton; Jeffery Foss; Johanna Munson; Jonathon M Beck; Brent Ralston  
**Subject:** Fwd: GRSG: ID disturbance calc methodology

Background on the dust-up

Sent from my iPhone

Begin forwarded message:

**From:** "Mackey, Dennis" <[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)>  
**Date:** January 19, 2015 at 9:13:54 AM MST  
**To:** Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Cc:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Subject: Re: GRSG: ID disturbance calc methodology**

If it helps, I can give you guys some background what went down last week. Jason and I happened to be in Denver for a SG status assessment meeting and got pulled into this on the edge.

It started with NV not wanting to have any disturbance cap, Sarah G suggested using the latest ID methodology. Then there was discussion of latest ID method being consistent with other states. Last I heard, they were either going with the latest ID with Brent mult factor or the previous ID version, both of which we were okay with us.

As long as they use one or the other of the ID versions we should be okay.....unless there is more to this.

All part of ongoing concern about consistency cross-state.

Let me know if it would help you guys to have more specifics than this.

Dennis

On Monday, January 19, 2015, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)> wrote:

Dennis

Thanks for the helpful note. We really need Noreen and Pat on the same page as FWS Idaho and Portland.

Jeff

Sent from my iPhone

On Jan 19, 2015, at 7:55 AM, "Mackey, Dennis" <[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)> wrote:

Tim and Jeff:

I'm around today if you need my help. Call my cell 208 860 1970.

Dennis

----- Forwarded message -----

From: **Theresa Rabot** <[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)>

Date: Monday, January 19, 2015

Subject: Fwd: GRSG: ID disturbance calc methodology

To: Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)>

Cc: Richard Hannan <[richard\\_hannan@fws.gov](mailto:richard_hannan@fws.gov)>, pat deibert <[Pat\\_Deibert@fws.gov](mailto:Pat_Deibert@fws.gov)>, Matt Kales <[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)>, Michael Thabault <[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)>, "nicole\_alt@fws.gov" <[nicole\\_alt@fws.gov](mailto:nicole_alt@fws.gov)>, "Mr. Jesse DElia" <[Jesse\\_DElia@fws.gov](mailto:Jesse_DElia@fws.gov)>, Dennis Mackey <[Dennis\\_Mackey@fws.gov](mailto:Dennis_Mackey@fws.gov)>, Mike Carrier <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>

I believe 3% is consistent however there are differences within that, for example Oregon is 1% per decade. I've reached out to mike and Denis, perhaps they can arrange for Brent to do a quick phone briefing.

Sent from my iPhone

On Jan 18, 2015, at 5:45 AM, Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)> wrote:

Dear friends,

We will need to circle our internal wagons on this issue. I heard this past week, and confirmed yesterday, that ID was using a different disturbance calculation method. To my knowledge, I never had heard that before (yet I am the first to acknowledge my memory is not perfect). I thought we had agreed to 3% with one methodology across the range. When I asked Ed Roberson this weekend WHY ID is using a different methodology to calculate disturbance, he replied:

*“Idaho has a far more detailed method that they worked out with Mike and Virgil. Brent explained it when we were in the Governors office.*

*It factors in more of disturbance variables from the research. If you want more info we reach out to Brent.”*

I had also reached out to Pat who has seen some (all?) of the ID process and has a potential concern.

So, I think what we need to wrestle with is the following:

Was this process described in the ID alternative that Richard indicated at the last TF meeting we support? As in, have we already indicated as an agency we support it?

Is any potential concern about the outcome of the process significant such that we should raise it now?

Can you all confer to provide a consensus recommendation? Thank you,

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Deputy State Supervisor  
U.S. Fish and Wildlife Service  
Boise, Idaho  
Office: 208-378-5267  
Cell: 208-860-1970

## Brent Ralston

---

**From:** Foss, Jeffery  
**Sent:** Wednesday, January 21, 2015 8:15 AM  
**To:** Theresa Rabot  
**Cc:** Dennis Mackey; Richard Hannan; Jesse DElia; Timothy Murphy; Johanna Munson; Jonathan Beck; Brent Ralston  
**Subject:** Re: FW: GRSG: ID disturbance calc methodology

Terry

I agree that Richard is important to have on the call as well as you, Pat, Jesse, and Dennis. I just spoke with Dennis. He said he will work towards arranging a call for Friday.

We understood from our leadership yesterday that the issue was resolved. On Friday we can explain the rationale behind our methodology.

Thanks for the coordination.

Jeff

**Jeff Foss**  
**Deputy State Director- Resources, Idaho BLM**  
**1387 S. Vinnell Way, Boise, ID 83709**  
**208-373-3800**  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

On Wed, Jan 21, 2015 at 8:06 AM, Theresa Rabot <[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)> wrote:

Agreed, thanks Jeff – I would also like Richard and I to be on if at all possible so we all have the same understanding.

**From:** Foss, Jeffery [mailto:[jfoss@blm.gov](mailto:jfoss@blm.gov)]  
**Sent:** Wednesday, January 21, 2015 6:20 AM  
**To:** Theresa Rabot  
**Cc:** Dennis Mackey; Richard Hannan; Jesse DElia; Timothy Murphy; Johanna Munson; Jonathan Beck; Brent Ralston  
**Subject:** Re: FW: GRSG: ID disturbance calc methodology

Terry

We can be available for a call tomorrow or Friday if there is a need to discuss this issue further. If we do have a call, I think it is important to have Pat, Jesse, and Dennis on the line and I can arrange to have Brent explain Idaho's approach and answer questions.



Dennis, can you check the availability of FWS folks then stop by and we can confirm a time that works for both agencies.

Thanks

Jeff

**Jeff Foss**

**Deputy State Director- Resources, Idaho BLM**

**1387 S. Vinnell Way, Boise, ID 83709**

**208-373-3800**

[jfoss@blm.gov](mailto:jfoss@blm.gov)

On Wed, Jan 21, 2015 at 6:43 AM, Theresa Rabot <[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)> wrote:

Jeff –

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I'd like to make sure we're all on the same page with the disturbance calculation – I'm not sure my note meant complete endorsement – I'm not knowledgeable enough at this point. I rely on the technical experts to tell me if it's good. As we all know and have said a few times (or more) what may work in one state may pose some problems when we look rangewide. I know Dennis, Jesse and Pat did engage on this yesterday and I've included the summary statement they sent me – reading this, I'm not quite sure where we are but I think we need to have a conversation next – I know this runs the risk of more frustration but I'd rather have that now than later -

I'm in DC, but could possibly get on a call tomorrow or Friday. I don't know Richard's availability today if that's better for you.

---

*Idaho BLM generated a novel equation for calculating disturbance for the purposes of monitoring for disturbance caps. Although IFWO did not express significant concerns when the calculation was presented by Idaho BLM, since the disturbance cap in Idaho is not likely to be hit under either method, our recent collective review of this equation in more detail (Pat, Jesse, and Jason) suggests that the genesis of this equation was based on the erroneous assumption that other planning efforts were not "incorporating fire" into their disturbance calculations. They note this in their rationale provided in draft proposal - "[a straight 3% disturbance cap] would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation." This is not true - all other planning areas are accounting for changes to the amount of available habitat (what Idaho BLM calls effective habitat) in the denominator of their disturbance calculations. In addition, the equation inserts two terms in their disturbance calculation that make the equation unnecessarily complex and difficult to interpret. First a term for the entire area of the BSU is included in the denominator, yet anthropogenic disturbance is only being measured in the effective habitat. Second, the inclusion of a "constant" is added as a correction factor. The result of adding these terms is that in some circumstances the amount of disturbance (in acres) actually allowed under a 3% cap would vary significantly depending on the equation applied - with Idaho's equation allowing more disturbance before hitting the cap in some scenarios.*

*It is unclear why Idaho BLM developed its own disturbance calculation apart from the rest of the Great Basin planning areas as we have been asking for consistency to the extent possible. That said, IFWO is confident that the conservation outcomes for sage-grouse will be the same regardless of the calculation methodology because the anthropogenic disturbance cap is not likely to be hit under either methodology in Idaho. Fire and invasives remain the greatest threat to sage-grouse habitat in that State. However, there is general agreement that applying Idaho's methodology more broadly could be problematic, because in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios.*

**From:** Michael Carrier [mailto:[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)]  
**Sent:** Monday, January 19, 2015 10:59 AM  
**To:** Theresa Rabot  
**Subject:** Re: GRSG: ID disturbance calc methodology

That's a good idea.

Michael Carrier

Supervisor, U.S. Fish and Wildlife Service

Idaho Office

On Jan 19, 2015, at 7:40 AM, Theresa Rabot <[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)> wrote:

Still would like Brent to discuss with pat so we don't have same problems later. I left vmail for Jesse

Sent from my iPhone

On Jan 19, 2015, at 11:34 AM, Michael Carrier <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)> wrote:

Sounds like this may have been put to rest.....for now.

Michael Carrier

Supervisor, U.S. Fish and Wildlife Service

Idaho Office

Begin forwarded message:

**From:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Date:** January 19, 2015 at 7:19:32 AM HST  
**To:** Michael Carrier <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>, Dennis Mackey <[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)>  
**Subject:** Fwd: GRSG: ID disturbance calc methodology

Sent from my iPhone

Begin forwarded message:

**From:** Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** January 19, 2015 at 8:39:12 AM MST  
**To:** Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Cc:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, Peter Ditton <[pditton@blm.gov](mailto:pditton@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, Jonathon M Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>  
**Subject:** Re: GRSG: ID disturbance calc methodology

Thank you all. Noreen got the answer she needed.  
The issue was not raised by Dan. All should be fine.  
Ed

On Jan 19, 2015, at 10:05 AM, Jeffery Foss  
<[jfoss@blm.gov](mailto:jfoss@blm.gov)> wrote:

As noted in the email below, the  
FWS at the Portland Regional Office  
(Asst Regional Director Terry  
Rabot) confirms their support for  
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Dennis"  
<[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)>  
**Date:** January 19,  
2015 at 7:55:07 AM  
MST  
**To:** Jeffery Foss  
<[jfoss@blm.gov](mailto:jfoss@blm.gov)>,  
Tim Murphy  
<[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Subject:** Fwd:  
**GRSG: ID  
disturbance calc  
methodology**

Tim and Jeff:

I'm around today if  
you need my help.  
Call my cell 208 860  
1970.

Dennis

----- Forwarded  
message -----  
From: **Theresa Rabot**  
<[theresa\\_rabot@fws.gov](mailto:theresa_rabot@fws.gov)>  
Date: Monday,  
January 19, 2015  
Subject: Fwd: GRSG:  
ID disturbance calc  
methodology  
To: Noreen Walsh  
<[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)>  
Cc: Richard Hannan  
<[richard\\_hannan@fws.gov](mailto:richard_hannan@fws.gov)>, pat deibert  
<[Pat\\_Deibert@fws.gov](mailto:Pat_Deibert@fws.gov)>, Matt Kales  
<[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)>, Michael Thabault  
<[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)>,  
"nicole\_alt@fws.gov"  
<[nicole\\_alt@fws.gov](mailto:nicole_alt@fws.gov)>  
>, "Mr. Jesse DElia"  
<[Jesse\\_DElia@fws.gov](mailto:Jesse_DElia@fws.gov)>, Dennis Mackey  
<[Dennis\\_Mackey@fws.gov](mailto:Dennis_Mackey@fws.gov)>, Mike  
Carrier  
<[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>

I believe 3% is  
consistent however  
there are differences  
within that, for  
example Oregon is  
1% per decade. I've  
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they can arrange for

Brent to do a quick  
phone briefing.

Sent from my iPhone

On Jan 18, 2015, at  
5:45 AM, Noreen  
Walsh  
<[noreen\\_walsh@fws.  
gov](mailto:noreen_walsh@fws.gov)> wrote:

Dear  
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We  
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*It factors in more of disturbance variables from the research. If you want more info we reach out to Brent.”*



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meeting we support?  
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Can you all confer to provide a consensus recommendation? Thank you,

Noreen

Noreen  
Walsh

Region  
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Directo  
r

Mount  
ain-  
Prairie  
Region

U. S.  
Fish  
and  
Wildlif  
e  
Service

303  
236  
7920

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Dennis Mackey

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## Brent Ralston

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**From:** Brent Ralston  
**Sent:** Friday, January 23, 2015 12:50 AM  
**To:** Johanna Munson; Jeffery Foss  
**Subject:** RE: Disturbance Calculation TPs  
**Attachments:** Disturbance Response.docx

Johanna & Jeff,

I took a look at the TPs and they seem fine with a little clean-up. I've attached a paper delineating the concerns raised by the USFWS and a response to those concerns. There is one response that I have not included as yet – 1. Because I want to go to bed; and 2. I want to talk with you before going too far down that path since our response may have ramifications to the other efforts. I'll forgo exercising tomorrow so I can be in shortly after 8 a.m. to talk about this.

Brent Ralston  
Project Lead  
Jarbidge Grazing Permit Team  
208-373-3812

**From:** Munson, Johanna [<mailto:jmunson@blm.gov>]  
**Sent:** Thursday, January 22, 2015 6:41 PM  
**To:** Ralston, Brent E; Foss, Jeffery L  
**Subject:** Disturbance Calculation TPs

Take a look at draft attached for discussion tomorrow am before the meeting at 11 am. Need some serious fact checking from Brent to make sure i have the details right.

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Johanna Munson  
Acting Branch Chief, Resources and Science  
Idaho State Office  
Bureau of Land Management  
1387 S. Vinnell Way  
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Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year.

Diebert - I thought that effective habitat was defined as areas with 70 to 90% sagebrush land cover (based on Knick et al. 2013). So it wouldn't include all sagebrush cover. Did I read that incorrectly?

Idaho BLM generated a novel equation for calculating disturbance for the purposes of monitoring for disturbance caps. Although IFWO did not express significant concerns when the calculation was presented by Idaho BLM, since the disturbance cap in Idaho is not likely to be hit under either method, our recent collective review of this equation in more detail (Pat, Jesse, and Jason) suggests that the genesis of this equation was based on the erroneous assumption that other planning efforts were not "incorporating fire" into their disturbance calculations. They note this in their rationale provided in draft proposal - "[a straight 3% disturbance cap] would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation." This is not true - all other planning areas are accounting for changes to the amount of available habitat (what Idaho BLM calls effective habitat) in the denominator of their disturbance calculations. In addition, the equation inserts two terms in their disturbance calculation that make the equation unnecessarily complex and difficult to interpret. First a term for the entire area of the BSU is included in the denominator, yet anthropogenic disturbance is only being measured in the effective habitat. Second, the inclusion of a "constant" is added as a correction factor. The result of adding these terms is that in some circumstances the amount of disturbance (in acres) actually allowed under a 3% cap would vary significantly depending on the equation applied - with Idaho's equation allowing more disturbance before hitting the cap in some scenarios.

It is unclear why Idaho BLM developed its own disturbance calculation apart from the rest of the Great Basin planning areas as we have been asking for consistency to the extent possible. That said, IFWO is confident that the conservation outcomes for sage-grouse will be the same regardless of the calculation methodology because the anthropogenic disturbance cap is not likely to be hit under either methodology in Idaho. Fire and invasives remain the greatest threat to sage-grouse habitat in that State. However, there is general agreement that applying Idaho's methodology more broadly could be problematic, because in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios.

## **Responses to Concerns Raised Regarding Idaho's Disturbance Calculation:**

**Concern:** Idaho BLM generated a novel equation for calculating disturbance for the purposes of monitoring for disturbance caps.... It is unclear why Idaho BLM developed its own disturbance calculation apart from the rest of the Great Basin planning areas as we have been asking for consistency to the extent possible.

**Response:** The alternative included in the Draft EIS's describing the National Technical Team Report (Alternative B in the Idaho and Southwestern Montana DEIS) included a management action to apply a 3% disturbance cap. However, there was no description of how this would be applied, calculated or implemented in subsequent management. The Preferred Alternatives (D & E) did not include a disturbance cap since disturbance was not identified as a major concern causing loss of habitat in Idaho or Southwestern Montana and its measurement and applicability was not defined and deemed highly problematic to implement in a meaningful way. When, during the early 2014 Federal Family Meeting USFWS indicated that inclusion of such a disturbance threshold was necessary in order for USFWS to have the assurance and certainty necessary when assessing GRS listing. At that point, outside of Wyoming's Disturbance Density Calculation Tool there was no developed approach to measure or calculate disturbance to evaluate a disturbance cap against.

Idaho BLM invited Dr. Steve Knick to discuss his study regarding disturbance (the only known scientific research describing a disturbance cap). Also as a result of that FFM the BLM's NOC began working on developing a disturbance calculation process that was not as intensive as the Wyoming DDCT approach, based on BLM guidance that anthropogenic disturbance measurement would not follow that approach in other states due the intensive and workload associated with that approach would not be feasible to implement in other states.

Idaho BLM followed the provided guidance to develop biologically significant units (BSUs). The NOC developed 3 equations to try and relate disturbance and habitat. These equations were specifically applicable to broad scales but not applicable to site specific scales. Idaho BLM took the information and built a simple equation measuring and evaluating absolute disturbance to compare against the cap. That equation was defined as:

$$\frac{\text{Acres of Anthropogenic Disturbance within } h \text{ BSU}}{\text{Acres within } h \text{ BSU}}$$

At the time of the August Federal Family Meeting the Idaho BLM had further refined the previous equation to more accurately reflect the findings in Knick's research. Disturbance was discussed at that meeting and it was evident that there was no other clear guidance from either the WO, the NOC or efforts from other states in this subject. Idaho was the only state to have put effort into the need identified by USFWS and the only effort to have a reasonable, scientifically based approach. Idaho did not intentionally deviate from consistent approaches being developed apart from the other Great Basin planning areas; and in fact until more recently Idaho is the only Great Basin planning effort to have put an approach together.

**Concern:** Although IFWO did not express significant concerns when the calculation was presented by Idaho BLM, since the disturbance cap in Idaho is not likely to be hit under either method,... That said, IFWO is confident that the conservation outcomes for sage-grouse will be the same regardless of the calculation methodology because the anthropogenic disturbance cap is not likely to be hit under either methodology in Idaho.

**Response:** Loss of habitat from anthropogenic disturbance is not a major issue in Idaho and Southwestern Montana; however, that does not mean that measurement and evaluation of a disturbance cap can be arbitrary, or any less supportable, or inconsistent with the scientific research available if that research can help inform the conditions and evaluation appropriately.

That is why the Idaho disturbance calculation is defined consistent with the scientific research making it reflective of the known effects to GRSG and supportable to base management decisions upon.

**Concern:** ...our recent collective review of this equation in more detail (Pat, Jesse, and Jason) suggests that the genesis of this equation was based on the erroneous assumption that other planning efforts were not "incorporating fire" into their disturbance calculations. They note this in their rationale provided in draft proposal - "[a straight 3% disturbance cap] would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation." This is not true - all other planning areas are accounting for changes to the amount of available habitat (what Idaho BLM calls effective habitat) in the denominator of their disturbance calculations.

**Response:** The Idaho calculation does consider the effect fire has on the habitat and includes loss of habitat from fire as part of the calculation by weighting the denominator based on the actual habitat available to the GRSG. At the time Idaho developed this scientifically based formula there were no other planning effort attempts to describe the disturbance cap so it would be impossible for Idaho to make any assumptions based on those other efforts, erroneous or otherwise, since none existed. The rationale described is in direct reference to the original equation Idaho BLM used:

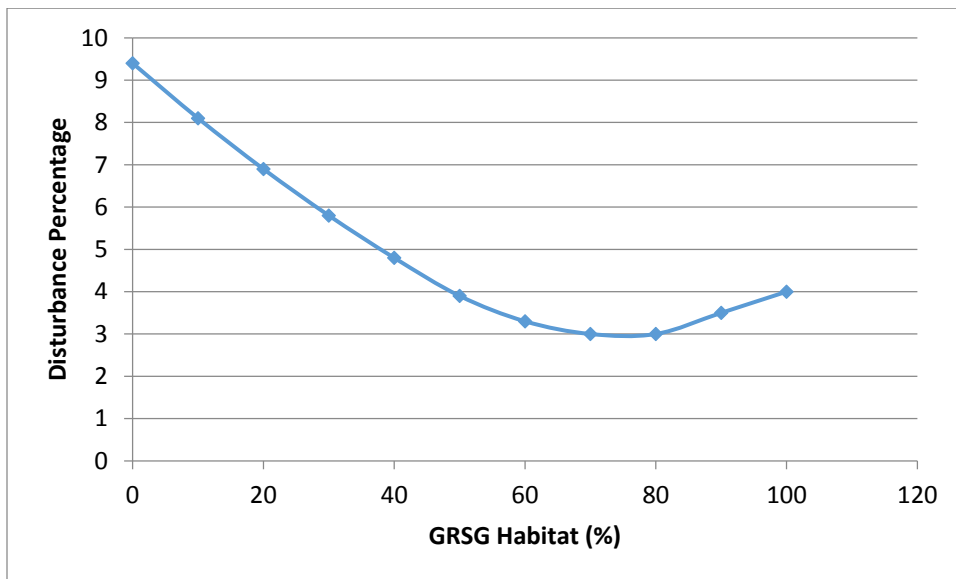
$$\frac{\text{Acres of Anthropogenic Disturbance within } h \text{ BSU}}{\text{Acres with } h \text{ BSU}}$$

Which does not account for changes in habitat due to loss through fire or gain through restoration. Currently, all other planning efforts may have calculations that account for changes in available habitat; however, the existence of these calculations now, roughly six months after Idaho's approach was developed is hardly evidence that the assumptions described in Idaho's approach are erroneous or in some way invalid. As stated previously Idaho's approach was not developed as a deviation or in comparison to other planning effort attempts at calculating the disturbance cap because such attempts did not yet exist when Idaho's approach was completed.



**Concern:** In addition, the equation inserts two terms in their disturbance calculation that make the equation unnecessarily complex and difficult to interpret. First a term for the entire area of the BSU is included in the denominator, yet anthropogenic disturbance is only being measured in the effective habitat. Second, the inclusion of a "constant" is added as a correction factor. The result of adding these terms is that in some circumstances the amount of disturbance (in acres) actually allowed under a 3% cap would vary significantly depending on the equation applied...

**Response:** The two terms at issue here are precisely what make the equation relevant and scientifically accurate and supportable, they may make the calculation more complex but natural systems are complex and mathematical equations developed to describe those systems may be somewhat complex. That they are difficult to interpret does not invalidate their inclusion and the value in numerical description those terms contribute to describing a complex situation. The actual relationship described in Knick et al., when graphed would resemble:



This graph shows the conceptual relationship curve of anthropogenic disturbance suggested by Knick et al. In that research it was shown that when anthropogenic disturbance reached 3% within an area surrounding leks (5-18km) then lek attendance was impacted through fewer birds attending on leks. In the graph above the curve assumes that the area described has 3% of its acres under some sort of anthropogenic developed. According to Knick et al. when 70-80 percent of an area is effective habitat for GRSG then anthropogenic development totaling 3% of that area will start to reduce lek attendance. That research also shows that if the effective habitat percentage within that area is over 90% or less than 70% lek attendance is affected when less than 3% of the area contains anthropogenic development. This relationship would mathematically be described using a parabolic (as opposed to a linear) equation, making it a much more accurate reflection of a complex system but also making it even more complex and difficult to interpret. In addition, while Knick et al. suggests this relationship, and defines the

effects at a 3% anthropogenic disturbance level in conjunction with 70-80% effective habitat. Knick et al., and we are aware of no other scientific studies, does not describe the trajectory of the curve above 80% or below 60%, so actually developing a more accurate, parabolic formula, is not possible at this time.

The Idaho equation is:

$$Disturbance\ Percentage = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance in the BSU}}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within the BSU}}{\text{Acres within the BSU}} + 0.3 \right)} \right) \times 100$$

This equation is meant to describe a spatial reality, for that reason it is imperative that the terms be linked with that spatial reality. Without this link any equation descriptive of a spatial reality would become meaningless to the reality it is trying to describe. The purpose of a disturbance cap and a supporting disturbance calculation is to measure and evaluate anthropogenic disturbance over a given area. For the purposes of application this area is defined as the biologically significant unit or BSU. For Idaho the BSU was delineated consistent with BLM guidance and reflective of the Knick et al. research. Idaho's BSU are defined as: all of the modeled nesting and delineated winter habitat, which is based on 2011 data, occurring within Priority and/or Important Habitat Management Areas within individual Conservation Areas for all land ownerships. Modeled nesting habitat is defined as a 10 km area around leks. Based on Idaho Department of Fish and Wildlife surveys and monitoring information this area around leks encompasses a vast majority of the nesting habitat (i.e. IDFG data show that over 90% of nesting occurs within 10 km of the lek). This 10 km is within the 5-18 km range for which Knick et al. identified their research was applicable. Knick communicated to the Idaho ID Team that beyond 18 km the disturbance relationship to lek attendance described in his research was not discernable). The equation calculates a disturbance value within that BSU area by totaling the acres of disturbance within that area and dividing by that area appropriately adjusted by effective habitat within that area to reflect a higher impact of disturbance when effective habitat is lower than the low end of the 70-80% optimum range (This optimum range is also supported by Connelly et al. 2000 (80%) and the BLM's National Technical Team Report (70%)). The equation does not accurately depict the disturbance relationship when effective habitat is greater than 80%. This is due to the fact the equation is linear as opposed to parabolic (discussed earlier) and that the areas within Idaho of most concern for continued presence of GRSG and impacts from anthropogenic disturbance do not exceed 80% effective habitat. This instance only occurs in the Mountain Valleys Conservation Area where existing disturbance is well below 2%. Therefore the applicability of the equation to these conditions is limited.

Anthropogenic disturbance is being measured and evaluated within the entire BSU, not just the effective habitat area, which is why it is important to define the denominator across the BSU scale, not just a portion of the BSU which is where the spatial link becomes critical. How the denominator is described mathematically defines the scale over which the numerator is measured; changing that scale would also require adjustments to the numerator to be

mathematically correct and maintain the spatial link critical for using a numeric equation to describe a spatial effect.

The presence of the constant (0.3) is a mathematical necessity that defines the relationship, it is neither irrelevant, nor is it a 'correction' factor. Correction implies there is something incorrect or erroneous in the equation. The effective habitat denominator adjustment term:

$$\left( \frac{\text{Acres of Effective Habitat within } h \text{ BSU}}{\text{Acres within } h \text{ BSU}} + 0.3 \right)$$

This entire term, in order to accurately reflect Knick et al. (see previous conceptual curve graph), must equal 1 when effective habitat within the BSU represents 70% of the BSU. Without the constant 0.3 added to the effective habitat proportion this term would not equal 1 when effective habitat is at 70%, it would not be a mathematical correct approximation of the disturbance relationship, it would lose its spatial link since this term needs to account for 100% of the acres in the BSU at the 70% habitat/3% disturbance intercept and would therefore become meaningless with respect to the spatial relationship that is being approximated.

That this equation would 'vary significantly depending on the equation applied...' is unequivocally correct since different equations may be describing different conditions. The real question becomes does the Idaho equation 'vary significantly' when compared to equations describing similar conditions? Essentially are we comparing like outcomes (i.e. apples and apples) or unlike outcomes (i.e. apples and oranges). See concern and response below.

**Concern:** ...with Idaho's equation allowing more disturbance before hitting the cap in some scenarios.

**Response:** This conclusion would need to be qualified based on the validity of the equation being used for comparison. While that specific equation has not been provided to verify that conclusion an Excel spreadsheet was shared and if the equation is represented by the disturbance relationship described in that table then the comparison equation can be expressed as:

$$\frac{\text{Acres of Disturbance}}{\text{Effective Habitat}}$$

This equation has the benefit of simplicity; however there are several fundamental flaws with this simple calculation which without further refinement to link the spatial reality with the mathematical formula make any current comparisons are invalid. This equation does not appropriately address: 1) spatial representation; 2) scale of the calculation; 3) consistency with known science; or 4) multiple considerations of single disturbances (i.e. double counting, which links back to the spatial representation aspect of the equation).

When using mathematical equations to describe real-world conditions it is imperative that the link between the spatial conditions and the mathematical representation of those conditions be

understood and maintained. Otherwise any comparison does not have an appropriate foundation for comparison and is ultimately of limited, if any, use. To help illustrate this equation would more accurately be written (which is the relationship described in the Excel Table):

(Acres of Disturbance within Effective Habitat + Acres of Disturbance outside Effective Habitat)

(Acres of Concern (BSU) – Acres outside Effective Habitat)

While more complicated, this equation is more accurately in depicting the actual formula used in the Excel Table provided by USFWS. This is further described when all the acres within the Area of Concern or BSU are Effective Habitat; Acres outside Effective Habitat would be zero, effectively eliminating that term and similarly Acres of Disturbance outside Effective Habitat would be zero since there are no acres outside Effective Habitat, therefore eliminating that term as well; leaving the original simplified version of this equation. However, when there are no Acres outside Effective Habitat within the Acres of Concern is the ONLY condition where this simplified equation actually represents and links to the real-world spatial conditions which are being described. So it is ONLY at this point (when the BSU contains 100% Effective Habitat) that the Idaho methodology and this simple equation can be appropriately compared. As described earlier the Idaho methodology (equation) does not accurately reflect the spatial conditions (according to Knick et al.) above 80% Effective Habitat (See previous discussion regarding why this is not a significant issue in need of resolution). Below 70% Effective Habitat where the Idaho methodology reflects the scientific relationships comparisons; the simple equation loses its spatial link and comparisons are not valid or appropriate.

So why is the spatial link lost? A key principle in translating spatial conditions to mathematical equations is, in this instance, each acre of either disturbance, within effective or outside effective habitat in the equation represents a real acre of disturbance, a real acre within effective habitat, a real acre outside effective habitat. If there are acres outside Effective Habitat within the Area of Concern the more accurate equation described above shows that those acres are REMOVED through subtraction from the denominator. This changes the scale of the calculation (see below) effectively redefining the spatial extent over which the Acres of Disturbance appropriate to the new scale/denominator can be measured. So this equation redefines the spatial extent for comparison through removing acres from the denominator, while at the same time it includes acres of disturbance in the numerator. The spatial representation is lost when the same acres are both included in the numerator but removed from the denominator.

Scale

Consistency with Known Science

Multiple Considerations of Single Disturbances

**Concern:** However, there is general agreement that applying Idaho's methodology more broadly could be problematic, because in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios.

**Response:** Using Idaho's methodology in other states will be problematic. Not because 'in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios' (see previous response regarding comparison of different spatially representative equations); but because the data needed to support Idaho's methodology are not readily available in other states. Idaho has collected, reviewed and updated on an annual basis for 12+ years a GRSG Key Habitat Map. This map tracks effective habitat, effects to that habitat from fire, restoration efforts and use by GRSG. This is the data utilized in the adjustment factor for the denominator and it is critical to the use of the equation, without this data actual meaningful application of the equation would not be possible or relevant. This is a data set that we are not aware exists within other planning areas. For this reason application of the Idaho methodology poses implementation concerns for areas beyond Idaho.

**Concern:** I thought that effective habitat was defined as areas with 70 to 90% sagebrush land cover (based on Knick et al. 2013). So it wouldn't include all sagebrush cover.

**Response:** For Idaho's methodology effective habitat is taken to be the Key Habitat areas described by the Idaho Key Habitat Map. Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year. This map also identifies areas that could provide GRSG habitat or currently provide habitat at less than optimum levels. These areas are also spatially depicted and as described as: R1 – perennial grass areas with limited sagebrush presence; R2 – annual grassland areas with limited perennial grasses or sagebrush presence; and R3- juniper encroachment within areas previously dominated by sagebrush.

## Brent Ralston

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**From:** Carman, Stephanie  
**Sent:** Thursday, January 22, 2015 10:29 AM  
**To:** Quincy Bahr; Jonathan Beck; Brent Ralston; Brian Hockett; Mary Bloom; Ruth Miller  
**Cc:** Frank Quamen; Matthew Magaletti; Lauren Mermejo  
**Subject:** URGENT: SG Habitat Questions (please delete the previous version)  
**Attachments:** SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_NCID.pdf;  
SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_WYBasin.pdf;  
SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_NCMT.pdf; Non-Habitat is SFAs.xlsx

(please disregard and delete the first email and attachments and use this instead. thank you)

We need UT, MT and ID to provide/verify the following information as soon as possible, hopefully within 1-2 hours. Please call me at 202 380 7421 with any questions.

On the attached maps, you will see highlighted the areas within the USFWS mapped Areas of Significance (our SFAs) which are non-habitat and Federally managed. For each of these, please provide:

Name (I made geographic names, but please change if these are named something specific, like a ACEC)

Acres - Frank is calculating there

Surface Manager

Current Classification (we think non-habitat, but check if these are PHMA or GHMA)

Existing Fluid Management (are these withdrawn or closed already)

Existing Locatable Mineral Management (are these withdrawn or closed already)

Other Allocations/Management Provisions (are there other management actions in here for renewables, ROWs, non-energy leasables, saleables, etc?)

SG Habitat Characteristics (are there are sagebrush lands or leks? seasonal habitat? please confirm that the state wildlife agency will agree with this)

SG Present (are there birds, even seasonally? please confirm that the state wildlife agency will agree with this)

For the BOR land in ID - do we manage the subsurface?

**Stephanie Carman**

Bureau of Land Management

Sage-Grouse Project Coordinator (Acting)

office 202-208-3408

mobile 202-380-7421

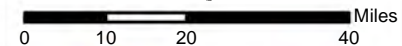
[scarman@blm.gov](mailto:scarman@blm.gov)

# Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas - North Central Idaho

## Legend

-  FWS Areas of Significance / Sagebrush Focal Areas
- Surface Management Agency**
-  Non-Habitat, Bureau of Land Management
-  Non-Habitat, US Fish and Wildlife Service
-  Non-Habitat, National Park Service
-  Non-Habitat, Bureau of Reclamation
-  Non-Habitat, State
-  Non-Habitat, Private
-  Non-Habitat, Other/ Undetermined
-  ADPP Habitat or Non-Habitat Outside of BLM Surface/ Subsurface Management

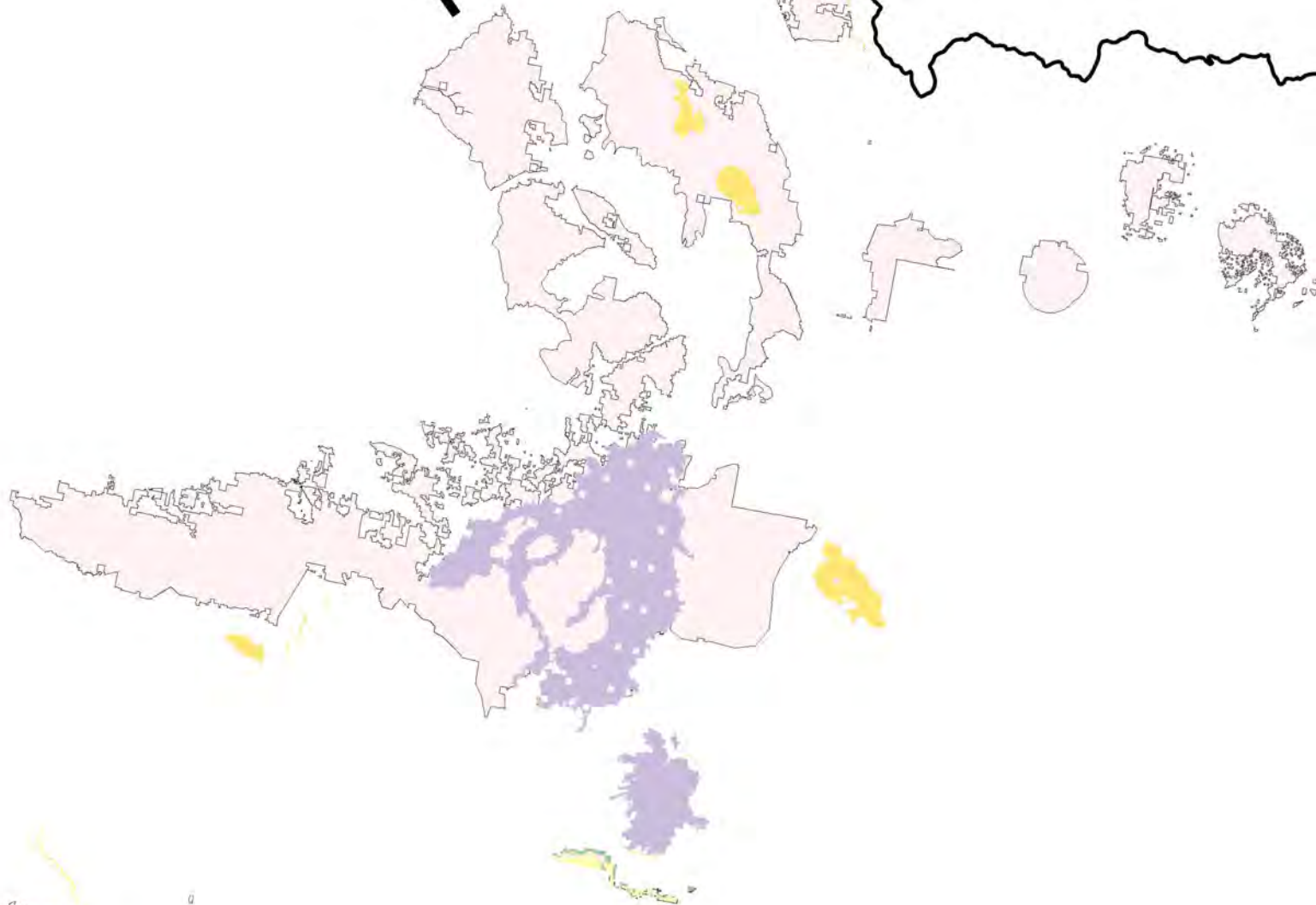
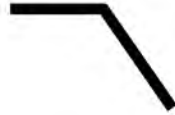
**Data Sources:**  
**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014. \*Only surface estate is used for classification in NV, OR and CA.  
**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.  
**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.  
**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).



IDM71\_0001098




**North-Central Idaho**





**Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas - North Central Montana-**


**Legend**

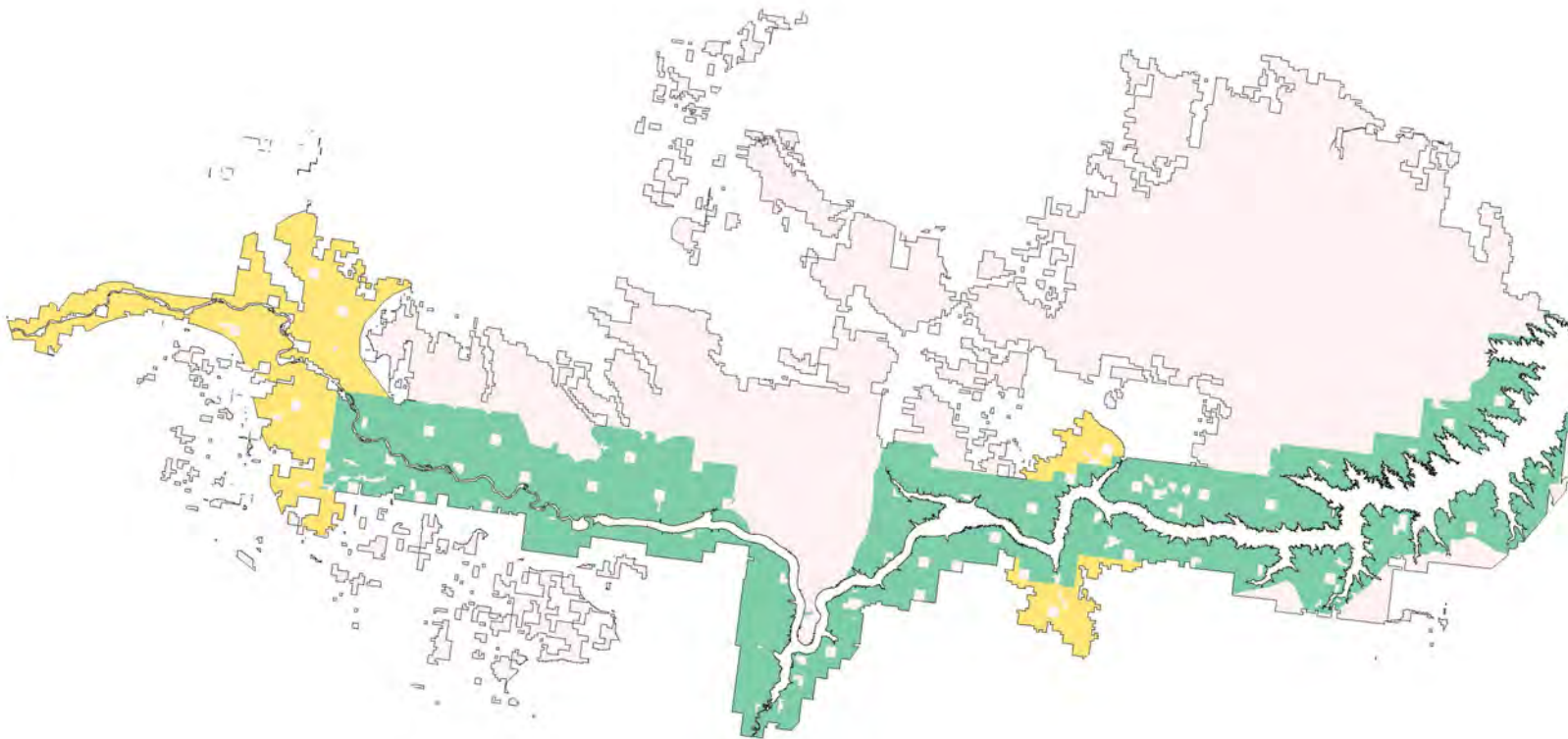
 FWS Areas of Significance / Sagebrush Focal Areas

**Surface Management Agency**

 Non-Habitat, Bureau of Land Management

 Non-Habitat, US Fish and Wildlife Service

 ADPP Habitat or Non-Habitat Outside of BLM Surface/ Subsurface Management



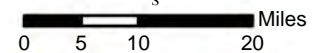
**Data Sources:**

**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014.

**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.

**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.

**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).



IDMT\_0001099









**Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas - Wyoming Basin-**

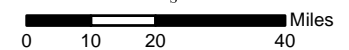
**Southwestern/ South Central Wyoming**

**Bear River Watershed Area**

**Legend**

-  FWS Areas of Significance / Sagebrush Focal Areas
- Surface Management Agency**
-  Non-Habitat, Forest Service
-  ADPP Habitat or Non-Habitat
-  Outside of BLM Surface/ Subsurface Management

**Data Sources:**  
**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014.  
**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.  
**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.  
**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).



IDW1\_0001100



**Brent Ralston**

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**From:** Munson, Johanna  
**Sent:** Wednesday, January 14, 2015 4:28 PM  
**To:** Lepak, Dominika; Christopher Robbins; Ralston, Brent E; Hoefer, Scott E; Bryce Bohn; Anne Halford; Eric Mayes; Kurt Wiedenmann; Makela, Paul D; Ethan Ellsworth  
**Cc:** Jonathan Beck; Foss, Jeffery L  
**Subject:** GRSG Grazing Language  
**Attachments:** Veg and Grazing 1.14.2015 tracked.docx

Hi all - attached is the latest Grazing/SG language from the WO reflecting the results of recent issue resolution with FWS. The document includes concepts/commitments/language that will be incorporated in the Idaho/SW MT SG Amendment and/or implementation processes. [REDACTED]

Please let Jon know if you have any comments, but recognize this is likely the final language.

This is an internal document and should not be shared with others.  
Thanks!!!

--  
Johanna Munson  
Acting Branch Chief, Resources and Science  
Idaho State Office  
Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

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Fax: 208-373-3805  
Email: [jmunson@blm.gov](mailto:jmunson@blm.gov)

**Issue:****Direction:****Vegetation Objectives**

Greater Sage-Grouse (GRSG) Administrative Draft Proposed Plans (ADPPs) will establish and incorporate vegetation and GRSG habitat objectives (see Attachment II for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used as a minimum to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP.

**Issue:****Direction:****Livestock Grazing Modifications**

The following decisions will be included in the Livestock Grazing section of the ADPPs.

- *The BLM will prioritize ~~evaluation~~processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, existing permits/leases in areas not meeting Land Health Standards, focusing on those containing riparian areas, including wet meadows, will take precedence over those areas meeting objectives/standards. Additional criteria may be used for prioritization.*
- *The NEPA analysis for ~~proposed modification of~~processing livestock grazing permits/leases ~~during the renewal process~~ will include ~~a range of alternatives and scientifically based adaptive management trigger thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses~~ that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA ~~and issuance of~~ issuance of a proposed/final grazing decision.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*

- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing, and whether removing grazing on the area where it had been permitted would be beneficial to GRSG habitat. Any decision to eliminate grazing on a specific area of land may be reconsidered in future LUP efforts.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

## Attachment II

## Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance

### Purpose

- I. Provide the planning units with land use planning vegetation objective that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for vegetation objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on conducting/prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

### Guidance

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region. Planning units are encouraged to work across boundaries when developing the objectives. Provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height		
	Arid sites		
	Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover		
	Arid sites		
Mesic sites			
Perennial grass and forb height			
Perennial forb canopy cover			
Arid sites			
Mesic sites			
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the sage-grouse habitat objectives when assessing the applicable standard in sage-grouse habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in sage-grouse designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment III

## Incorporating GSGR RMP Decisions into Grazing Authorizations

### Purpose

The purpose is to provide recommended ADPP language and outline the process for prioritizing the modification of grazing permits/leases in accordance with prioritization criteria, provide for adjusting livestock grazing within the terms and conditions of permits, and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

### Background

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with ~~either~~:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Appropriation authority (Section 411, PL 113-76 for Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The ~~most recent rider is contained~~FLPMA amendment was included in Section 411, Public Law 113-76.<sup>1</sup> The ~~rider~~FLPMA amendment to

<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112-74 is amended by striking “and 2013” and inserting “through ~~2015~~2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all



Section 402 (c) allows BLM to renew grazing permits and leases under the same terms and conditions. This relieves the BLM’s renewal processing workload, ~~which allows~~ allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination<sup>3</sup> with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>4</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record, ~~and interested public who is affected by the proposed actions, terms or conditions, or modifications relating to applications, permits and agreements (including range improvement permits), or leases.~~ Copies of the decisions are provided to the interested publics.

### **Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize evaluationprocessing of grazing permits/leases within in Sagebrush Focal Areas (SFAs) followed by ~~other~~ PHMAs outside of the SFAs. In setting workload priorities, existing permits/leases in areas not meeting Land Health Standards, focusing on those containing riparian areas, including wet meadows, will take precedence over those areas meeting objectives/standards. Additional criteria may be used for prioritization.
- The NEPA analysis for ~~proposed modification of processing~~ livestock grazing permits/leases ~~during the renewal process~~ will include a range of alternatives and scientifically based adaptive management trigger thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without

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applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes-

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> ~~43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).~~

<sup>4</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

conducting additional NEPA ~~and issuance of~~ issuing a proposed/final grazing decision.

- Allotments within SFAs, ~~then followed by those~~ within ~~other~~-PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.
- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing, and whether removing grazing on the area where it had been permitted would be beneficial to GRS habitat. Any decision to eliminate grazing on a specific area of land may be reconsidered in future LUP efforts.

### **Modifying Grazing Permits to Meet GRS RMP Amendments/Revisions Objectives**

~~If an existing permit/lease within PHMAs will require the modification of a grazing permit (because it is not meeting the Land Health Standards), the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.~~

BLM will develop criteria to prioritize the workload to modify existing grazing permits/leases (~~that were~~ either fully processed or ~~were~~ reauthorized based on the Congressional Appropriations rider, or issued under Section 402(c)(2) of FLPMA) within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRS habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRS habitat objectives found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis on the proposed modification of the permit/lease will include adaptive management options when the GRSG habitat objectives found in the Special Status Species section of the land use plan are not being met. The NEPA analysis should include a range of alternatives that allows the authorized officer to make adjustments to livestock grazing without additional NEPA or issuance of a proposed/final grazing decision. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

### **Compliance Monitoring of Modified Grazing Permits**

Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Actual Use
- Utilization
- Use Supervision
- 

### **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will determine whether to specific lands should still be available for livestock grazing through a site-specific evaluation and associated NEPA analysis. The NEPA analysis would analyze whether removing grazing on the area where it had been permitted would be beneficial to GRSG habitat. Any decision to remove grazing on a specific area of land may be reconsidered in future LUP efforts.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

**Brent Ralston**

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**From:** Lauren Mermejo  
**Sent:** Friday, January 30, 2015 6:50 PM  
**To:** jmbeck@blm.gov; Brent Ralston  
**Subject:** In Case You Haven't Seen This  
**Attachments:** Issues Resolved\_ID 1.30.15 final.docx; schedule 1.30.15.xlsx; Greater Sage Grouse Talking Points Jan 29.docx; Final\_SFA.zip

Please keep this all internal to BLM and FS ID Team members only. I'll send the map layers in a few minutes. The Final SFA.zip drive is also included.

Happy weekend, we will discuss on Monday.

Lauren

***BLM-IDAHO***

**Greater Sage-Grouse Planning Issues for the BLM Planning Teams to Insert and Analyze in Administrative Draft Proposed Plan (ADPP)**

**January 30, 2015**

*The March 4, 2010 decision by the U.S. Fish and Wildlife Service that the greater sage-grouse warranted listing but was precluded [Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to list the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered] set in motion the most comprehensive land-use planning initiative in the BLM's history.*

*In 2011, the BLM began updating land-use plans across the West so as to ensure not only the long-term viability of the greater sage-grouse on public lands and the continued economic vitality of the West. This has been a complex and demanding process involving collaboration with an unprecedented number of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service and many others. The BLM's mandate of multiple use and sustained yield has required us to balance the full range of resource uses on public lands, including the conservation of crucial wildlife habitat. As we have worked through this process, public land managers throughout the BLM have made difficult resource management decisions.*

*These documents provide key guidance that will enable the BLM to finalize land use plans that will contribute to the conservation of the Greater Sage-Grouse and other sagebrush associated species across the West. The guidance outlines a suite of tools, such as disturbance limits in key habitats and mitigation approaches, which will help us to reach this goal. These mechanisms will work in concert to conserve sage-grouse habitat so that we can achieve our twin goals of thriving Greater Sage-Grouse populations and robust Western economies.*

***Issue:***

**Development in Highly Important Landscapes**

***Direction:***

As more specifically provided in this guidance, the ADPP will include Sagebrush Focal Areas (SFA), consisting of the BLM and FS-managed lands within the area depicted in the October 27, 2014 USFWS memo, *Greater Sage-Grouse: Additional Recommendation to Refine Land Use Allocations in Highly Important Landscapes*. In the Special Status Species Section of Chapter 2, include the following management action drop in language (for the Proposed Plan only):

*“Designate Sagebrush Focal Areas (SFA) as shown on Map X (x acres). SFAs will be managed as PHMA, with the following additional management:*

- 1) Recommended for withdrawal from the General Mining Act of 1872, subject to valid existing rights.*
- 2) Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.*

- 3) *Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."*

**The NOC will provide updated shapefiles that delineate the SFAs.**

Except as otherwise provided below, the ADPP will provide that all BLM- and FS-managed lands (including subsurface) within SFAs will be allocated and managed as PHMA and include the management actions above.

- *Do Not Include the following in SFA Management*
  - Hawley Mountain WSA (ID), Shoshone WSA (ID), Cedar Buttes WSA (ID), Lower Salmon Falls Creek (ID), Little Jack Wilderness (ID), Bruneau-Jarbidge Wilderness (ID) in non-habitat – The current management in these areas is generally protective of GRSG. As applicable, these will continue to be managed so as not to impair their suitability for preservation as wilderness, or under the terms of the Wilderness Act to preserve wilderness character.
    - To the extent that these areas were analyzed for contingent management as general or priority habitat, the ADPP will include contingent allocations and management direction that would apply in the event that Congress releases the areas from WSA status
  - Non-habitat areas outside Little Jack and Bruneau-Jarbidge Wilderness and Salmon Falls Creek ACEC which were previously shown within the SFA –These areas will not be managed as PHMA or SFA.
- Do Include Donkey Hills ACEC –In order to consolidate parcels for protection as SFAs, this area will be treated as PHMA and included for SFA management.
- *Do Not Include Other Agency Land in SFA Management* – while lands managed by other agencies will be shown on the SFA maps, BLM ADPP decisions will not be applied to them.
- *Do Not Include Private/State Lands in SFA Management* – while private lands may be within the SFA boundaries, ADPP decisions will not be applied to them, but may apply to Federal subsurface underlying such lands as provided below.
- *Subsurface Estate:*
  - Under private/state lands: subsurface estate in PHMA and GHMA should be treated as PHMA with SFA management actions.
  - Under other Federal lands: subsurface state should be treated as PHMA with SFA management actions if it is not already withdrawn (such as in Refuges or Parks) and PHMA or GHMA management was analyzed in the DEIS.

Additional direction/drop in language for the ADPPs on SFAs will be forthcoming.

**Issue:**

**Direction:**

**Mitigation**

The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In all sage-grouse habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:**

**Direction:**

**Mapping**

Not Applicable

**Issue:**

**Direction:**

**Disturbance**

Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance (see Attachment II).

Planning units will include the following land use plan actions within their ADPPs that states:

- a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*

- b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

**Issue:**

**Direction:**

**Vegetation Objectives**

The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

**Issue:**

**Direction:**

**Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*



- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

**Issue:**

**Direction:**

**Mineral Materials (Salable Minerals)**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

**Issue:**

**Direction:**

**High-voltage Transmission and Major Pipeline ROWs and Corridors**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high*

*voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project's NEPA review process, which will include analysis of the following conservations measures.”*

**Issue:** **Coal Suitability**  
**Direction:** Not Applicable in Idaho

**Issue:** **Fluid Mineral Resources (Including Geothermal)**  
**Direction:** All ADPPs will include the following as a conservation objective:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h).”*

*“Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.”*

**Issue:** **No Surface Occupancy (NSO) Exception Language**  
**Direction:** Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new fluid mineral leases at the time of leasing only and may not be applied to existing fluid mineral leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*“No waivers or modifications to a fluid mineral lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action’s impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.”*

***Issue:***

***Direction:***

**Adaptive Management**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also

investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

**Issue:**

**Direction:**

**Application of Lek Buffers**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment IV) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review (Open File Report 2014-1239) in accordance with Appendix X.”*

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<i>Idaho/SW MT*</i>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion Imp – Avoid
<b>Wind – General</b>	Open Screening process
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open

## Attachment I

# GREATER SAGE-GROUSE RMPA/FEIS TEMPLATE LANGUAGE FOR ADDRESSING MITIGATION

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

## Chapter 1 - Introduction

[Nothing new to add to EIS]

## Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

## Mitigation

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.

avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and



compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.

- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- **Compensatory Mitigation Options**
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- **Compensatory Mitigation Siting**
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- **Compensatory Mitigation Project Types and Costs**
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- **Compensatory Mitigation Compliance and Monitoring**
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

**Durability (protective and ecological):** the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Disturbance Caps Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use of locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER analysis in the land use plans (Chapter 2, Affected Environment) and the use of the “west-wide” sagebrush availability and habitat degradation data/estimates for the Priority Habitat Management Areas in each population for monitoring and management purposes as the LUPs are being implemented.
- VII. Provide guidance on what is considered in the disturbance calculations versus what is considered for the disturbance cap.

#### **Guidance**

- I. Planning units will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*
  - b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain*

*the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

- II. Use of west-wide habitat degradation data as well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use the west-wide data at a minimum and/or locally collected disturbance data as available (e.g., DDCT) for the anthropogenic disturbance types listed in Table 1.
  
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 7 additional features that are considered threats to sage-grouse (Table 2). Using 1 meter resolution NAIP imagery is recommended. Use local data if available.
  
- IV. Fire-burned and habitat treatment areas will not be included in the project scale degradation disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
  
- V. Planning units are directed to use a density cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is on average less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than an average of 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area (*subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.*).
  - Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments)

- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the Affected Environment section of the proposed plans/ FEISs. West-wide sagebrush availability and habitat degradation data layers will be used for the Priority Habitat Management Areas in each population for monitoring (see the GRSG Monitoring Framework in the Monitoring Appendix of the EIS) and management purposes as the LUPs are being implemented. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.
- VII. Planning units are directed to use the three measures (sagebrush availability, habitat degradation, density of energy and mining) in conjunction with other information during the NEPA process to most effectively site project locations, such as by clustering disturbances and/or locating facilities in already disturbed areas. Although locatable mine sites are included in the degradation calculation, mining activities under the 1872 mining law may not be subject to the 3% disturbance cap. Details about locatable mining activities should be fully disclosed and analyzed in the NEPA process to assess impacts to sage-grouse and their habitat as well as to BLM goals and objectives, and other BLM programs and activities.

### **Additional Information/Formulas**

A collaborative effort in Idaho developed a disturbance calculation method that includes the 3% disturbance cap plus a modifier that includes effective habitat and is described in Appendix G of their ADPP. The formulas below are excerpted from that Appendix.

Disturbance Calculations for the BSU:

*Disturbance Percentage*

$$= \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^1}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within h BSU}}{\text{Acres within h BSU}} + 0.3 \right)} \right) \times 100$$

Disturbance Calculations for Project Analysis Areas:



*Disturbance Percentage*

$$= \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^{1,2}}{\text{Acres within the Project Area} * \left( \frac{\text{Acres of Effective Habitat within } h \text{ BSU}}{\text{Acres within } h \text{ BSU}} + 0.3 \right)} \right) \times 100$$

<sup>1</sup> see Table 3. <sup>2</sup> see Table 2.

Project analysis area method for permitting surface disturbance activities:

- Draw the project analysis area polygon which consists of a 4 mile buffer around the proposed project footprint plus all of the area within a 4 mile buffer from nearby leks if those lek buffers intersect the project buffer. In areas with mapped or modeled nesting habitats, the areas to be included in the project analysis area are the mapped/modeled habitat within 4 miles beyond the project 4 mile buffer.
- Map disturbances or use locally available data. Use of NAIP imagery is recommended.
- Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
- Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
- Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1 facility per 640 acres, averaged across project analysis area, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1 facility per 640 acres, averaged across the project analysis area, either defer the proposed project or co-locate it into existing disturbed area.
- If a project that would exceed the degradation cap or density cap cannot be deferred due to valid existing rights or other existing laws and regulations, fully disclose the local and regional impacts of the proposed action in the associated NEPA.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

**Table 2.** The seven additional features to include in the disturbance calculation at the project scale

<ol style="list-style-type: none"> <li>1. Coalbed Methane Ponds</li> <li>2. Meteorological Towers</li> <li>3. Nuclear Energy Facilities</li> <li>4. Airport Facilities and Infrastructure</li> <li>5. Military Range Facilities &amp; Infrastructure</li> <li>6. Hydroelectric Plants</li> <li>7. Recreation Areas Facilities and Infrastructure</li> </ol>
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**Table 3.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

## **Background**

In the USFWS's 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse's habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 7 types of features that are threats to sage-grouse will be used in the project analysis areas.

		Scales		
		Broad/Mid (Populations)	Intermediate (BSU)	Local/Project (Seas. Hab.)
Habitat Degradation	Unit:	WAFWA Populations	Biologically Significant Unit	Project/Local Habitat Area <sup>6</sup>
	Area of Interest:	PHMAs	PHMAs	PHMAs
	Data:	Westwide degradation data	Westwide <sup>2</sup> , State, Local	State, Local
	Formula (Measure 2a):	<u>12 Degradation Threats</u> PHMAs in Populations	<u>12 Degradation Threats</u> PHMAs in BSUs	<u>12 Degradation Threats + 7<sup>7</sup></u> PHMAs in Proj./Loc. Hab. Area <sup>6</sup>
	Management:	Internal BLM & FS estimates	3% <sup>3</sup> Cap, Adapt. Mgmt <sup>4</sup>	3% <sup>3</sup> Disturbance Cap
	All Lands:	Yes	Yes	Yes
	Fire Included:	No	No	No
	Who:	BLM NOC	BLM NOC <sup>5</sup> or State Offices	State Offices or Field Offices
Sagebrush Availability	Unit:	WAFWA Populations	Biologically Significant Unit	n/a
	Area of Interest:	PHMAs	PHMAs	
	Data:	LANDFIRE Updated EVT	Updated EVT or State data	
	Formula (Measure 1a):	<u>Existing Updated Sagebrush</u> PHMAs in Populations	<u>Existing Updated Sagebrush</u> PHMAs in BSUs	
	Management:	Internal BLM & FS estimates	Adaptive Management <sup>4</sup>	
	All Lands:	Yes	Yes	
	Fire Included:	Yes	Yes	
	Who:	BLM NOC	BLM NOC <sup>5</sup> or State Offices	
Energy and Mining	Unit:	WAFWA Populations	n/a	Project Area & Seasonal Hab.
	Area of Interest:	PHMAs		PHMAs
	Data:	Westwide well & mine data		Westwide <sup>2</sup> , State data
	Formula (Measure 3):	<u>Well Pads and Mines<sup>1</sup></u> Square Mile		<u>Well Pads and Mines<sup>1</sup></u> Square Mile
	Management:	Internal BLM & FS estimates		Project Authorization
	All Lands:	Yes		Yes
	Fire Included:	No		No
	Who:	BLM NOC		BLM NOC or SOs or FOs

**ACRONYMS**

PHMA = Priority Habitat Management Area      BSU = Biologically Significant Unit  
 EVT = Existing Vegetation Type                BpS = Areas of Biotic Potential

<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.  
<sup>2</sup> Westwide data will be used only if state or local data are not available.  
<sup>3</sup> A 5% disturbance cap will be allowed in Wyoming.  
<sup>4</sup> This may be one of several variables used to inform Adaptive Management. The BSU is the scale at which Adaptive Management will be applied.  
<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data/analysis should be used for Adaptive Management  
<sup>6</sup> The analysis area will be based on a 4-mile project area, 4-mile buffers around leks/lek complexes, or other seasonal habitat, and clipped to sage-grouse habitat and PHMA (DDCT methodology).  
<sup>7</sup> See Table 2

## Attachment III

### **Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

#### **Guidance**

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.



## Attachment IV

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in

grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

**Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSG RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSG habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSG habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

Attachment V

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*

Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

  - linear features (roads) within 3.1 miles of leks
  - infrastructure related to energy development within 3.1 miles of leks.
  - tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
  - low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
  - surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
  - noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis.

  - Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
  - If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
    - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater

level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).

- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.

## **Status Update on BLM Land Use Plans for Greater Sage-Grouse**

*Internal Working Document*

*January 29*

### **Talking Points for use by State Directors**

State Directors should be the point on communication with media within the state. Please pass these talking points on to your district and field managers to ensure they have consistent communication.

#### **Talking Points**

- The BLM's multiple use and sustained yield mission requires us to find a balance between the full range of resources, including the conservation of crucial wildlife habitat, and resource uses. These principles have driven the development of BLMs conservation planning strategy for greater sage-grouse and its habitat.
- Our planning process has been complex and highly collaborative with meaningful coordination with the public serving as the cornerstone. Throughout the process, we have worked closely with a broad range of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service, the U.S. Forest Service and many others.
- Working with our partners, as we move from draft plans to final, the BLM and USFS are resolving key issues (like disturbance limits and mitigation approaches) and are moving to complete our proposed land use plans/final EISs by late spring, and the records of decision by late summer.
- We have confidence these plans when final will help ensure the long-term viability of the greater sage-grouse and other iconic wildlife species on public lands and the continued economic vitality of the West.
- Strong Federal land use plans (BLM and USFS), however, will only get us part of the way in ensuring the long-term conservation of greater sage-grouse and avoid the need to list under the Endangered Species Act.
- One third of sage-grouse habitat is administered by the states or is privately-owned. For this reason, strong State plans as well as an effective strategy to reduce the risk of fire to greater sage-grouse habitat are key components of the range-wide strategy. We are continuing our collaboration with our state and federal partners as well as private landowners to ensure all components of a range-wide strategy are in place.
- Together we can ensure listing of the greater sage-grouse is no longer warranted while preserving traditional Western economic activity that is also dependent on a healthy sagebrush range.

### **Key Elements to Land Use Plans:**

- We are implementing key elements of the planning effort, which will enable us to achieve greater clarity and consistency across the range while honoring specific local approaches and conditions.
- Key elements addressed include:
  - Limiting or eliminating new surface disturbance in sage-grouse priority habitat and minimizing additional disturbance in general habitat.
  - Improving greater sage-grouse habitat condition
  - Reducing the threat of rangeland fire to greater sage-grouse in the Great Basin by placing added priority prevention, suppression and restoration of sagebrush landscapes threatened by rangeland fire through improved federal-state-local collaboration and coordination.



## Brent Ralston

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**From:** Foss, Jeffery  
**Sent:** Friday, November 21, 2014 3:47 PM  
**To:** Jonathan Beck; Brent Ralston  
**Subject:** Fwd: Conference Call Materials  
**Attachments:** AoS\_GRSGHab\_State\_uni\_ide\_dis\_SMA\_ide\_dis.xlsx

----- Forwarded message -----

From: **Stephanie Carman** <[scarman@blm.gov](mailto:scarman@blm.gov)>  
Date: Fri, Nov 21, 2014 at 3:00 PM  
Subject: Fwd: Conference Call Materials  
To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
Cc: Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>

The tables showing the FWS maps vs habitat management areas

Stephanie Carman  
BLM Legislative Affairs  
Mobile 202 380 7421

Sent from my iPhone

Begin forwarded message:

Stephanie Carman  
BLM Legislative Affairs  
Mobile 202 380 7421

Sent from my iPhone

**Date:** November 20, 2014 at 5:33:40 PM EST  
**To:** "Roberson, Edwin" <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Cc:** "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, Jamie Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, "Simpson, Donald A" <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, "Perez, Jerome E" <[jperez@blm.gov](mailto:jperez@blm.gov)>, Michael Haske <[mhaske@blm.gov](mailto:mhaske@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Stella Portillo <[sportill@blm.gov](mailto:sportill@blm.gov)>, Judith Frye <[jfrye@blm.gov](mailto:jfrye@blm.gov)>, Maritiza Harris <[mtharris@blm.gov](mailto:mtharris@blm.gov)>, Jessica Camargo <[jcamargo@blm.gov](mailto:jcamargo@blm.gov)>, Claudia Walker <[cbwalker@blm.gov](mailto:cbwalker@blm.gov)>, Samuel Herbert <[sjherber@blm.gov](mailto:sjherber@blm.gov)>, Joanne Maluotoga <[jmaluoto@blm.gov](mailto:jmaluoto@blm.gov)>, Kathy Mondor <[kmondor@blm.gov](mailto:kmondor@blm.gov)>, Annette Fournier <[afournie@blm.gov](mailto:afournie@blm.gov)>, Jamie Harrison <[jharriso@blm.gov](mailto:jharriso@blm.gov)>, Michael Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>, Marjean Gleaton <[mgleaton@blm.gov](mailto:mgleaton@blm.gov)>  
**Subject: Re: Conference Call Materials**

As mentioned by Ed during the call, attached is the spreadsheet showing the acres in PHMA, GHMA, and non-habitat in the FWS Areas of Significance maps.

**Stephanie Carman**  
Bureau of Land Management  
National Sage-Grouse Coordinator (Acting)  
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On Thu, Nov 20, 2014 at 12:32 PM, Roberson, Edwin <[eroberso@blm.gov](mailto:eroberso@blm.gov)> wrote:

GRSG State Directors:

Attached is a document for our discussion on the conference call this afternoon which highlights the proposed decisions to be discussed with USFWS on Friday - please do not share this widely. (I have copied your Executive Assistants so they can get them to you or your Proxy for the call.) For each issue, following the statement of the BLM Issue Direction, there are internal notes on the BLM's high-level messages, previous concerns from USFWS, and short summaries of the concerns we have heard from the state directors. (These sections are for our use and will not be shared with the USFWS.) I am continuing to reach out to some of you state directors today to discuss these items and encourage you to bring up concerns which are not noted in this document on the call this afternoon.

I have also attached the "Allocation Table" which shows areas of consistency with the NPT guidance. Again, please do not share this widely.

Important Note: None of this is yet final; after discussions today with you and the meetings with USFWS on Friday and Monday, we will be meeting with the Secretary on Tuesday. We anticipate that we will have final information to share then.

We look forward to the discussion at 3:30 eastern time (1:30 mountain and 12:30 pacific). ed

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**Jeff Foss**  
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1387 S. Vinnell Way, Boise, ID 83709  
208-373-3800  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

Using only Proposed PHMA (ID Core), GHMA, and ID Important Categories

State	Habitat Category in FWS Areas of Significance								Grand Total
	PHMA/ID Core Only	% of FWS Areas of Significance	GHMA	% of FWS Areas of Significance	ID Important	% of FWS Areas of Significance	Non-Habitat**	% of FWS Areas of Significance	
<b>ID</b>	<b>4,091,064</b>	<b>87.44%</b>	<b>1,525</b>	<b>0.03%</b>	<b>842</b>	<b>0.02%</b>	<b>585,537</b>	<b>12.51%</b>	<b>4,678,969</b>
Bureau of Land Management	3,575,199	76.41%	1,525	0.03%	842	0.02%	93,650	2.00%	3,671,216
Forest Service	263,042	5.62%	0	0.00%	0	0.00%	11,636	0.25%	274,678
Fish and Wildlife Service	0	0.00%	0	0.00%	0	0.00%	2,332	0.05%	2,332
Bureau of Indian Affairs	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Other Federal	217	0.00%	0	0.00%	0	0.00%	471,315	10.07%	471,533
Private	125,468	2.68%	0	0.00%	0	0.00%	769	0.02%	126,237
State	127,096	2.72%	0	0.00%	0	0.00%	2,000	0.04%	129,096
Other	42	0.00%	0	0.00%	0	0.00%	3,835	0.08%	3,877
<b>MT</b>	<b>1,089,769</b>	<b>55.11%</b>	<b>104,205</b>	<b>5.27%</b>	<b>0</b>	<b>0.00%</b>	<b>783,407</b>	<b>39.62%</b>	<b>1,977,382</b>
Bureau of Land Management	981,778	49.65%	34	0.00%	0	0.00%	188,001	9.51%	1,169,813
Forest Service	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Fish and Wildlife Service	278	0.01%	96,344	4.87%	0	0.00%	552,856	27.96%	649,478
Bureau of Indian Affairs	160	0.01%	0	0.00%	0	0.00%	0	0.00%	160
Other Federal	0	0.00%	0	0.00%	0	0.00%	510	0.03%	510
Private	67,721	3.42%	1,618	0.08%	0	0.00%	13,523	0.68%	82,862
State	39,707	2.01%	6,206	0.31%	0	0.00%	28,488	1.44%	74,402
Other	125	0.01%	3	0.00%	0	0.00%	29	0.00%	157
<b>NV</b>	<b>3,230,329</b>	<b>90.40%</b>	<b>51,666</b>	<b>1.45%</b>	<b>0</b>	<b>0.00%</b>	<b>291,546</b>	<b>8.16%</b>	<b>3,573,541</b>
Bureau of Land Management	2,155,750	60.33%	13,115	0.37%	0	0.00%	50,397	1.41%	2,219,262
Forest Service	477,286	13.36%	7,980	0.22%	0	0.00%	131,918	3.69%	617,185
Fish and Wildlife Service	447,376	12.52%	23,349	0.65%	0	0.00%	103,363	2.89%	574,087
Bureau of Indian Affairs	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Other Federal	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Private	147,825	4.14%	7,124	0.20%	0	0.00%	5,359	0.15%	160,308
State	0	0.00%	1	0.00%	0	0.00%	0	0.00%	1
Other	2,091	0.06%	98	0.00%	0	0.00%	509	0.01%	2,697
<b>OR</b>	<b>2,225,819</b>	<b>95.93%</b>	<b>73,371</b>	<b>3.16%</b>	<b>0</b>	<b>0.00%</b>	<b>21,107</b>	<b>0.91%</b>	<b>2,320,297</b>
Bureau of Land Management	1,886,427	81.30%	31,658	1.36%	0	0.00%	11,591	0.50%	1,929,676
Forest Service	588	0.03%	0	0.00%	0	0.00%	0	0.00%	588
Fish and Wildlife Service	244,469	10.54%	24,826	1.07%	0	0.00%	9,449	0.41%	278,745
Bureau of Indian Affairs	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Other Federal	8,494	0.37%	551	0.02%	0	0.00%	0	0.00%	9,045
Private	70,981	3.06%	4,296	0.19%	0	0.00%	59	0.00%	75,336
State	14,858	0.64%	12,037	0.52%	0	0.00%	7	0.00%	26,902
Other	2	0.00%	3	0.00%	0	0.00%	0	0.00%	5
<b>UT</b>	<b>211,964</b>	<b>83.99%</b>	<b>0</b>	<b>0.00%</b>	<b>0</b>	<b>0.00%</b>	<b>40,395</b>	<b>16.01%</b>	<b>252,359</b>
Bureau of Land Management	181,108	71.77%	0	0.00%	0	0.00%	18	0.01%	181,125
Forest Service	11,851	4.70%	0	0.00%	0	0.00%	35,592	14.10%	47,444
Fish and Wildlife Service	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Bureau of Indian Affairs	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Other Federal	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Private	14,510	5.75%	0	0.00%	0	0.00%	2,749	1.09%	17,259
State	4,494	1.78%	0	0.00%	0	0.00%	2,037	0.81%	6,531
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
<b>WY</b>	<b>3,682,722</b>	<b>99.19%</b>	<b>29,560</b>	<b>0.80%</b>	<b>0</b>	<b>0.00%</b>	<b>573</b>	<b>0.02%</b>	<b>3,712,855</b>
Bureau of Land Management	3,359,558	90.48%	637	0.02%	0	0.00%	13	0.00%	3,360,209
Forest Service	2,776	0.07%	0	0.00%	0	0.00%	560	0.02%	3,336
Fish and Wildlife Service	2,838	0.08%	20,263	0.55%	0	0.00%	0	0.00%	23,100
Bureau of Indian Affairs	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0
Other Federal	68,049	1.83%	68	0.00%	0	0.00%	0	0.00%	68,117
Private	103,766	2.79%	6,412	0.17%	0	0.00%	0	0.00%	110,178
State	143,670	3.87%	738	0.02%	0	0.00%	0	0.00%	144,408
Other	2,064	0.06%	1,443	0.04%	0	0.00%	0	0.00%	3,507
<b>Grand Total</b>	<b>14,531,667</b>	<b>87.99%</b>	<b>260,327</b>	<b>1.58%</b>	<b>843</b>	<b>0.01%</b>	<b>1,722,566</b>	<b>10.43%</b>	<b>16,515,402</b>

\*\* Areas of PAC that are not within PHMA, ID Core, GHMA or ID Important are grouped in the Non-Habitat column

Sum of Acres Row Labels	Column Labels					Grand Total
	PAC/PHMA/ID Core	GHMA	ID Important	Non-Habitat		
<b>ID</b>	<b>4,229,559</b>	<b>1,525</b>	<b>761</b>	<b>447,123</b>	<b>4,678,969</b>	
BLM	3,607,287	1,525	761	61,642	3,671,216	
FS	269,739	0	0	4,939	274,678	
FWS	0	0	0	2,332	2,332	
BIA	0	0	0	0	0	
Other Federal	98,601	0	0	372,931	471,533	
PVT	125,598	0	0	639	126,237	
ST	128,279	0	0	817	129,096	
Other	55	0	0	3,822	3,877	
<b>MT</b>	<b>1,180,275</b>	<b>41,420</b>	<b>0</b>	<b>755,686</b>	<b>1,977,382</b>	
BLM	981,851	0	0	187,962	1,169,813	
FS	0	0	0	0	0	
FWS	85,188	37,836	0	526,454	649,478	
BIA	160	0	0	0	160	
Other Federal	0	0	0	510	510	
PVT	68,638	1,515	0	12,709	82,862	
ST	44,313	2,066	0	28,023	74,402	
Other	125	3	0	29	157	
<b>NV</b>	<b>3,388,391</b>	<b>508</b>	<b>0</b>	<b>184,642</b>	<b>3,573,541</b>	
BLM	2,216,939	439	0	1,884	2,219,262	
FS	528,073	0	0	89,112	617,185	
FWS	481,250	68	0	92,769	574,087	
BIA	0	0	0	0	0	
Other Federal	0	0	0	0	0	
PVT	159,722	0	0	586	160,308	
ST	0	1	0	0	1	
Other	2,407	0	0	290	2,697	
<b>OR</b>	<b>2,226,207</b>	<b>73,251</b>	<b>0</b>	<b>20,839</b>	<b>2,320,297</b>	
BLM	1,886,729	31,566	0	11,382	1,929,676	
FS	588	0	0	0	588	
FWS	244,538	24,816	0	9,391	278,745	
BIA	0	0	0	0	0	
Other Federal	8,494	551	0	0	9,045	
PVT	70,999	4,278	0	59	75,336	
ST	14,858	12,037	0	7	26,902	
Other	2	3	0	0	5	
<b>UT</b>	<b>252,359</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>252,359</b>	
BLM	181,125	0	0	0	181,125	
FS	47,444	0	0	0	47,444	
FWS	0	0	0	0	0	
BIA	0	0	0	0	0	
Other Federal	0	0	0	0	0	
PVT	17,259	0	0	0	17,259	

ST	6,531	0	0	0	6,531
Other	0	0	0	0	0
<b>WY</b>	<b>3,682,723</b>	<b>29,560</b>	<b>0</b>	<b>572</b>	<b>3,712,855</b>
BLM	3,359,559	637	0	12	3,360,209
FS	2,776	0	0	560	3,336
FWS	2,838	20,263	0	0	23,100
BIA	0	0	0	0	0
Other Federal	68,049	68	0	0	68,117
PVT	103,766	6,412	0	0	110,178
ST	143,670	738	0	0	144,408
Other	2,064	1,443	0	0	3,507
<b>Grand Total</b>	<b>14,959,514</b>	<b>146,264</b>	<b>761</b>	<b>1,408,862</b>	<b>16,515,402</b>

Sum of Acres Row Labels	Column Labels				
	PHMA	PAC and PHMA	ID Core	PAC and ID Core	PAC and GHMA
<b>ID</b>	<b>125</b>	<b>80</b>	<b>118,906</b>	<b>3,971,953</b>	<b>0</b>
BLM	118	76	87,951	3,487,053	0
FS	7	4	28,052	234,979	0
FWS	0	0	0	0	0
BIA	0	0	0	0	0
Other Federal	0	0	11	207	0
PVT	0	0	809	124,658	0
ST	0	0	2,082	125,014	0
Other	0	0	0	42	0
<b>MT</b>	<b>132,111</b>	<b>957,658</b>	<b>0</b>	<b>0</b>	<b>62,785</b>
BLM	109,225	872,554	0	0	33
FS	0	0	0	0	0
FWS	166	111	0	0	58,508
BIA	0	160	0	0	0
Other Federal	0	0	0	0	0
PVT	18,609	49,112	0	0	103
ST	4,111	35,596	0	0	4,140
Other	0	125	0	0	0
<b>NV</b>	<b>31,713</b>	<b>3,198,555</b>	<b>0</b>	<b>61</b>	<b>51,158</b>
BLM	20,839	2,134,849	0	61	12,676
FS	8,270	469,017	0	0	7,980
FWS	2,420	444,956	0	0	23,281
BIA	0	0	0	0	0
Other Federal	0	0	0	0	0
PVT	182	147,643	0	0	7,124
ST	0	0	0	0	0
Other	1	2,089	0	0	98
<b>OR</b>	<b>38</b>	<b>2,225,782</b>	<b>0</b>	<b>0</b>	<b>120</b>
BLM	23	1,886,404	0	0	93
FS	0	588	0	0	0
FWS	8	244,461	0	0	10
BIA	0	0	0	0	0
Other Federal	0	8,494	0	0	0
PVT	1	70,980	0	0	17
ST	4	14,855	0	0	0
Other	2	0	0	0	0
<b>UT</b>	<b>78</b>	<b>211,885</b>	<b>0</b>	<b>0</b>	<b>0</b>
BLM	78	181,029	0	0	0
FS	0	11,851	0	0	0
FWS	0	0	0	0	0
BIA	0	0	0	0	0
Other Federal	0	0	0	0	0

PVT	0	14,510	0	0	0
ST	0	4,494	0	0	0
Other	0	0	0	0	0
<b>WY</b>	<b>0</b>	<b>3,682,722</b>	<b>0</b>	<b>0</b>	<b>0</b>
BLM	0	3,359,558	0	0	0
FS	0	2,776	0	0	0
FWS	0	2,838	0	0	0
BIA	0	0	0	0	0
Other Federal	0	68,049	0	0	0
PVT	0	103,766	0	0	0
ST	0	143,670	0	0	0
Other	0	2,064	0	0	0
<b>Grand Total</b>	<b>164,065</b>	<b>10,276,682</b>	<b>118,906</b>	<b>3,972,014</b>	<b>114,063</b>

<b>GHMA</b>	<b>PAC and ID Important</b>	<b>ID Important</b>	<b>Non-Habitat</b>	<b>PAC</b>	<b>Grand Total</b>	<b>PHMA</b>
<b>1,525</b>	<b>81</b>	<b>761</b>	<b>447,123</b>	<b>138,414</b>	<b>4,678,969</b>	4,091,064
1,525	81	761	61,642	32,007	3,671,216	3,575,199
0	0	0	4,939	6,697	274,678	263,042
0	0	0	2,332	0	2,332	0
0	0	0	0	0	0	0
0	0	0	372,931	98,384	471,533	217
0	0	0	639	130	126,237	125,468
0	0	0	817	1,183	129,096	127,096
0	0	0	3,822	13	3,877	42
<b>41,420</b>	<b>0</b>	<b>0</b>	<b>755,686</b>	<b>27,721</b>	<b>1,977,382</b>	1,089,769
0	0	0	187,962	39	1,169,813	981,778
0	0	0	0	0	0	0
37,836	0	0	526,454	26,402	649,478	278
0	0	0	0	0	160	160
0	0	0	510	0	510	0
1,515	0	0	12,709	814	82,862	67,721
2,066	0	0	28,023	466	74,402	39,707
3	0	0	29	0	157	125
<b>508</b>	<b>0</b>	<b>0</b>	<b>184,642</b>	<b>106,904</b>	<b>3,573,541</b>	3,230,329
439	0	0	1,884	48,513	2,219,262	2,155,750
0	0	0	89,112	42,806	617,185	477,286
68	0	0	92,769	10,593	574,087	447,376
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	586	4,773	160,308	147,825
1	0	0	0	0	1	0
0	0	0	290	219	2,697	2,091
<b>73,251</b>	<b>0</b>	<b>0</b>	<b>20,839</b>	<b>268</b>	<b>2,320,297</b>	2,225,819
31,566	0	0	11,382	209	1,929,676	1,886,427
0	0	0	0	0	588	588
24,816	0	0	9,391	58	278,745	244,469
0	0	0	0	0	0	0
551	0	0	0	0	9,045	8,494
4,278	0	0	59	0	75,336	70,981
12,037	0	0	7	0	26,902	14,858
3	0	0	0	0	5	2
<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>40,395</b>	<b>252,359</b>	211,964
0	0	0	0	18	181,125	181,108
0	0	0	0	35,592	47,444	11,851
0	0	0	0	0	0	0
0	0	0	0	0	0	0
0	0	0	0	0	0	0



0	0	0	0	2,749	17,259	14,510
0	0	0	0	2,037	6,531	4,494
0	0	0	0	0	0	0
<b>29,560</b>	<b>0</b>	<b>0</b>	<b>572</b>	<b>1</b>	<b>3,712,855</b>	<b>3,682,722</b>
637	0	0	12	1	3,360,209	3,359,558
0	0	0	560	0	3,336	2,776
20,263	0	0	0	0	23,100	2,838
0	0	0	0	0	0	0
68	0	0	0	0	68,117	68,049
6,412	0	0	0	0	110,178	103,766
738	0	0	0	0	144,408	143,670
1,443	0	0	0	0	3,507	2,064
<b>146,264</b>	<b>81</b>	<b>761</b>	<b>1,408,862</b>	<b>313,704</b>	<b>16,515,402</b>	<b>14,531,667</b>

GHMA	ID Imp	Non
1,525	842	585,537
1,525	842	93,650
0	0	11,636
0	0	2,332
0	0	0
0	0	471,315
0	0	769
0	0	2,000
0	0	3,835
104,205	0	783,407
34	0	188,001
0	0	0
96,344	0	552,856
0	0	0
0	0	510
1,618	0	13,523
6,206	0	28,488
3	0	29
51,666	0	291,546
13,115	0	50,397
7,980	0	131,918
23,349	0	103,363
0	0	0
0	0	0
7,124	0	5,359
1	0	0
98	0	509
73,371	0	21,107
31,658	0	11,591
0	0	0
24,826	0	9,449
0	0	0
551	0	0
4,296	0	59
12,037	0	7
3	0	0
0	0	40,395
0	0	18
0	0	35,592
0	0	0
0	0	0
0	0	0

0	0	2,749
0	0	2,037
0	0	0
29,560	0	573
637	0	13
0	0	560
20,263	0	0
0	0	0
68	0	0
6,412	0	0
738	0	0
1,443	0	0
260,327	843	1,722,566

OBJECTID	FID_Outlin	PAC_HAB	st_abbr	ADMIN_AC	Shape_Len	Shape_Are	Acres
1	-1	GHMA	CA	BLM	#####	#####	#####
2	-1	GHMA	CA	FS	#####	#####	#####
3	-1	GHMA	CA	LG	#####	#####	#####
4	-1	GHMA	CA	PVT	#####	#####	#####
5	-1	GHMA	CA	ST	#####	#####	#####
6	-1	GHMA	CA	UND	#####	#####	#####
7	-1	GHMA	CO	BLM	#####	#####	#####
8	-1	GHMA	CO	BOR	#####	#####	#####
9	-1	GHMA	CO	FS	#####	#####	#####
10	-1	GHMA	CO	FWS	#####	#####	#####
11	-1	GHMA	CO	LG	#####	#####	#####
12	-1	GHMA	CO	NPS	#####	#####	#####
13	-1	GHMA	CO	PVT	#####	#####	#####
14	-1	GHMA	CO	SMA Gap	#####	#####	#####
15	-1	GHMA	CO	ST	#####	#####	#####
16	-1	GHMA	ID	BIA	#####	#####	#####
17	-1	GHMA	ID	BLM	#####	#####	#####
18	-1	GHMA	ID	BOR	#####	#####	#####
19	-1	GHMA	ID	COE	#####	#####	#####
20	-1	GHMA	ID	DOD	#####	#####	#####
21	-1	GHMA	ID	DOE	#####	#####	#####
22	-1	GHMA	ID	FAA	#####	#####	#####
23	-1	GHMA	ID	FS	#####	#####	#####
24	-1	GHMA	ID	NPS	#####	#####	#####
25	-1	GHMA	ID	PVT	#####	#####	#####
26	-1	GHMA	ID	SMA Gap	#####	#####	#####
27	-1	GHMA	ID	ST	#####	#####	#####
28	-1	GHMA	ID	UND	#####	#####	#####
29	-1	GHMA	MT	BIA	#####	#####	#####
30	-1	GHMA	MT	BLM	#####	#####	#####
31	-1	GHMA	MT	BOR	#####	#####	#####
32	-1	GHMA	MT	COE	#####	#####	#####
33	-1	GHMA	MT	DOD	#####	#####	#####
34	-1	GHMA	MT	FS	#####	#####	#####
35	-1	GHMA	MT	FWS	#####	#####	#####
36	-1	GHMA	MT	LG	#####	#####	#####
37	-1	GHMA	MT	NPS	#####	#####	#####
38	-1	GHMA	MT	PVT	#####	#####	#####
39	-1	GHMA	MT	SMA Gap	#####	#####	#####
40	-1	GHMA	MT	ST	#####	#####	#####
41	-1	GHMA	MT	UND	#####	#####	#####
42	-1	GHMA	MT	USDA	#####	#####	#####
43	-1	GHMA	ND	BLM	#####	#####	#####
44	-1	GHMA	ND	FS	#####	#####	#####
45	-1	GHMA	ND	PVT	#####	#####	#####
46	-1	GHMA	ND	ST	#####	#####	#####

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471	1 ID Core	ID	ST	#####	#####	#####
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612	1 PHMA	UT	PVT	#####	#####	#####

**From:** Carlson, John  
**Sent:** Wednesday, December 31, 2014 10:46 AM  
**To:** Stephanie Carman; Vicki Herren  
**Cc:** Jake Chaffin  
**Subject:** Fwd: MT priority map  
**Attachments:** John Carlson Proposal.docx; lewistown\_Report\_final (2).pdf

**Flag Status:** Flagged

Hi Vicki, Stephanie, and Frank,  
Please see the attached. The actual amount would be less since we are already having them do fine scale habitat mapping for our PHMAs which would give us the sagebrush density info they describe here. I have also attached a report of the work they have already completed for us in one of the core areas. Just wanted you to be aware of this potential methodology for getting good sagebrush maps throughout the west that would be much better than the current west-wide habitat data we are currently using. Open Range has a working relationship with ESRI and are looking to be able to deliver this information via a web portal for managers. Gregg Simonds will be in DC in early Feb. and may be contacting you Steph and Vicki to see if he can arrange a visit and discuss this more fully with you. J

John C. Carlson  
Conservation Biologist  
Bureau of Land Management  
Montana/Dakotas State Office  
5001 Southgate Drive  
Billings, MT 59101-4669  
(406) 896-5024

----- Forwarded message -----

From: **Gregg Simonds** <[greggesimonds@gmail.com](mailto:greggesimonds@gmail.com)>  
Date: Fri, Dec 26, 2014 at 10:55 AM  
Subject: Re: MT priority map  
To: "Carlson, John" <[jccarls@blm.gov](mailto:jccarls@blm.gov)>  
Cc: Dave Naugle <[david.naugle@umontana.edu](mailto:david.naugle@umontana.edu)>, "Griffiths, Tim - NRCS, Bozeman, MT" <[Tim.Griffiths@mt.usda.gov](mailto:Tim.Griffiths@mt.usda.gov)>, Eric <[eric@openrangeconsulting.com](mailto:eric@openrangeconsulting.com)>

John

I really enjoyed the visit too.  
Thanks for the map.

Attached is my proposal to get the % sagebrush cover throughout the state this winter. This work could be analyzed to assess Habitat Degradation and Energy and Mining Density but they are not part of this proposal.

Please let me know what you think and i'd be happy to answer any questions.

Gregg  
801 231 2521

On Dec 23, 2014, at 1:08 PM, Carlson, John <[jccarlso@blm.gov](mailto:jccarlso@blm.gov)> wrote:

Nice visiting with you Gregg.  
Here is the map. Let me know if you have any questions. J

John C. Carlson  
Conservation Biologist  
Bureau of Land Management  
Montana/Dakotas State Office  
5001 Southgate Drive  
Billings, MT 59101-4669  
(406) 896-5024

<open range priority core areas.pdf>

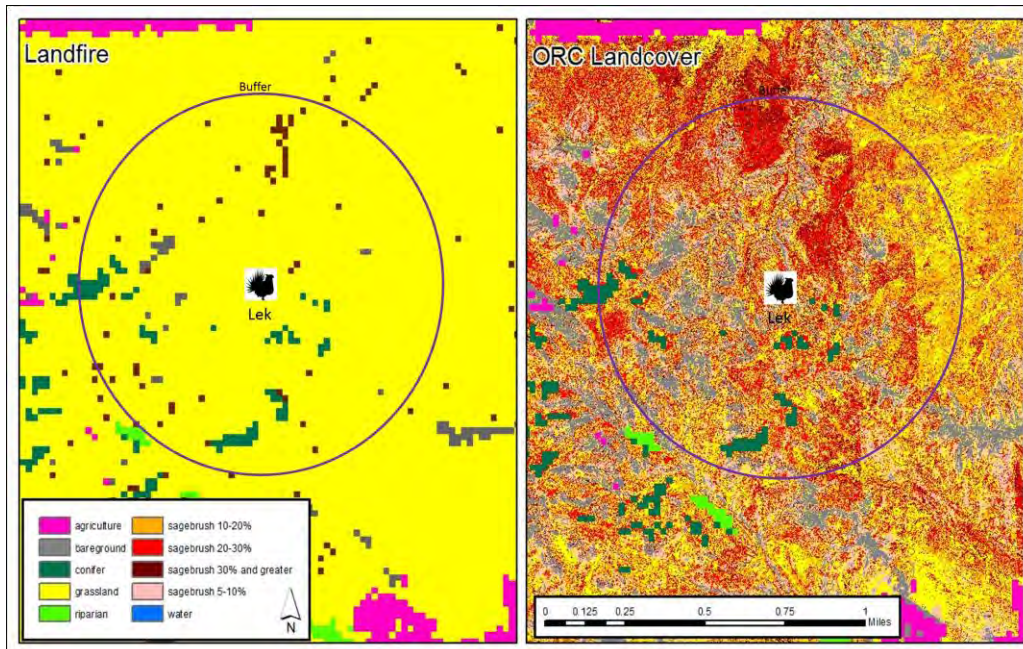
John

**Open Range Consulting (ORC) proposal to assess % sagebrush throughout Montana using a quick and inexpensive (\$.04/ac) method that has accuracy between 70 - 90% and can be completed this winter (2015).**

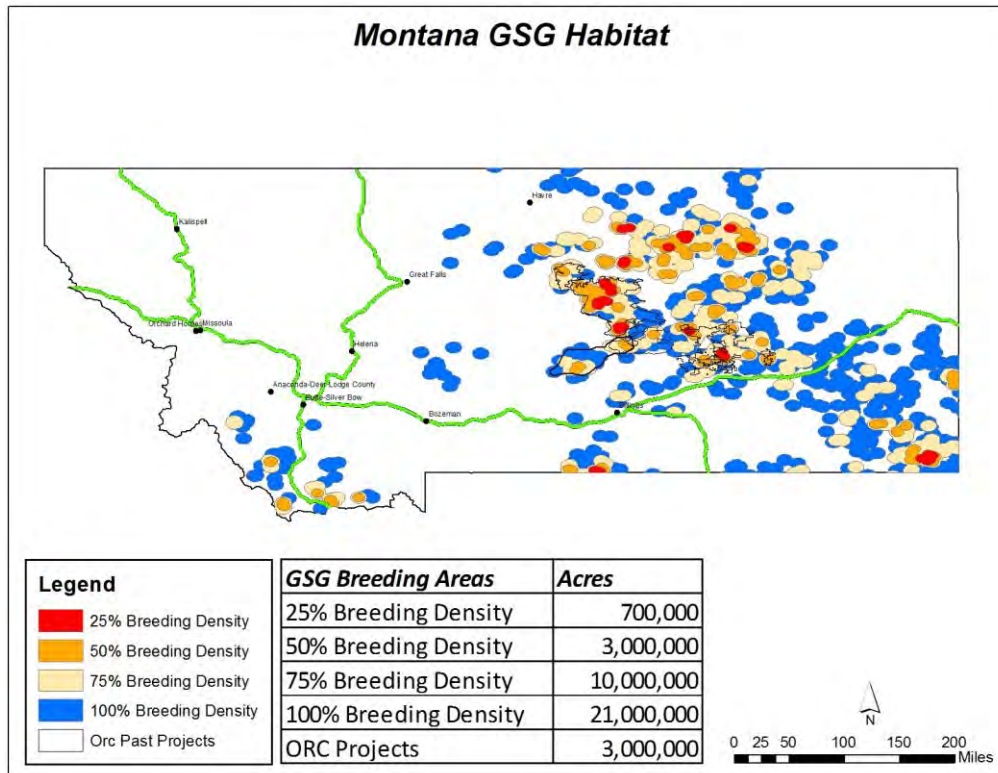
The Sage-Grouse Habitat Assessment Framework (HAF) states that landscape conservation is a scale-dependent process whereby priority landscapes are identified across the species range (broad-scale) and the appropriate conservation actions are implemented within seasonal habitats to benefit populations at the site scale (Stivers et al. 2010). The BLM and USFS (The Greater Sage-Grouse Monitoring Framework, 2014) states “this multi-scale monitoring approach is necessary, as sage-grouse are a landscape species and conservation is scale-dependent to the extent that conservation actions are implemented within seasonal habitats to benefit populations”. Further, it states “the tendency to look at a single indicator of habitat suitability or only one scale limits managers’ ability to identify the threats to sage-grouse and to respond at the appropriate scale.

The Greater Sage-Grouse Monitoring Framework identified 18 threats contributing to the destruction, modification, or curtailment of sage-grouse habitat or range. These 18 threats have been aggregated into three broad- and mid-scale measures, one of which is; Sagebrush Availability (percent of sagebrush per unit area). The best currently available imagery to assess % sagebrush is LANDFIRE EVT. The Greater Sage-Grouse Monitoring Framework, 2014 recognize that current data sets might be “inadequate” and “will strive to develop or obtain information to fill these data gaps” if needed.

The following figure illustrates the difference between Landfire EVT and the ORC’s proposal assessment at the exact same area around a GSG lek in Montana. The left panel depicts LANDFIRE EVT capabilities, whereas the panel on the right depicts ORC’s proposal’s capabilities. We believe that our proposed % sagebrush cover map will provide the accuracy necessary to jump start the decision support needed in GSG planning. Further, our map work can be used to enrich future broad scale readily available imagery and it can be served through ERSI platform (either via internet or cloud).



Budget:		
	Imagery Preprocessing	\$ .01/acre
	Field Photography	\$ .015/acre
	Analysis	\$ .02/acre
Total		\$ .045/acre



**Total Cost to do all of Montana GSG habitat \$900,000**

**Cautionary Note:** We have only “dry lab” this procedure using newly available 1- foot aerial imagery from ERSI and we validated processes’ estimate our % sagebrush estimates using photos that we have taken from our previous fieldwork. Our dry lab analysis, both in Utah and Montana, has shown that it is very promising that we can accurately assess the % of sagebrush using our process. We believe that we can put our equipment (camera, computer software, hardware) into a pod and take the pictures from a helicopter. We haven’t done the helicopter part yet but assume enough though we haven’t done our photos from a helicopter it has a very high change of working well. Because, airborne pods have already been developed for this purpose, are inexpensive and readily available.

**Potential:** Taking pictures via a helicopter will give us a tremendous range and coverage in a short amount of time (million acres per day). These pictures couple with the 1 foot imagery and our techniques that we’ve developed to integrate them provides a unique opportunity to get much more accurate ( $r^2=0.70-0.90$ ) and differenced assessment of sagebrush % over statewide scales than is currently available. This assessment would allow strategic planners to have confidence in the accuracy of sagebrush cover throughout the state. This cover estimate can be overlaid with the priority GSG areas and their leks throughout the state of Montana and planner could then estimate limitation to seasonal habitat for local populations. Identifying opportunities and limitation would enrich the state wide strategic planning efforts by helping to prioritize where the “biggest bang for the buck”, in time and money, would be best spent on local efforts to preserve and enhance habitat. It would also identify who would be needed in making projects happen, what administrative steps would be needed, who could be potential funders and both ecological and economic validation for the actions. Finally, it would help our field assessment using photographic ground sampling that provides details of understory conditions to estimate range land conditions (ecological states), treatment potential, feedback on effects of management actions and change detection.



# **Assessing Range Condition of Sage-grouse Habitat of Core Areas 3 and 5 near Winnett, Montana**



*Open Range Consulting*

October, 2014

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## **Introduction/Background**

Open Range Consulting (ORC) contracted with the Bureau of Land Management (BLM) to assess important ground cover attributes of sage-grouse habitat of the Winnett area within the state of Montana using geospatial technology. With the potential listing of sage-grouse as a threatened species, this project is part of a concerted effort to assess the condition of sage-grouse habitat at a landscape level. The Winnett Project Area (WPA) corresponds to Montana's Core sage-grouse Areas 3 and 5 and has significant sage-grouse populations representing two of twelve core areas in the state. These core areas have the greatest breeding densities in the state. They are only a third of all of Montana's sage-grouse habitat acreage but have 75% of all the known breeding sage-grouse. The information contained in this report and its associated deliverables will support management efforts to protect and enhance sage-grouse habitat in Core Areas 3 and 5.

In order to assess the important characteristics of sage-grouse habitat, ORC delineated rudimentary but very important habitat conditions throughout the entire project area. On the uplands, this included the percent cover of sagebrush, bare ground, and herbaceous matter. For drainage areas, it included the amount of late summer riparian vegetation within the Potential Riparian Area (PRA). ORC's ability to assess rudimentary ground cover conditions over an entire landscape, robustly describes the area's functionality, can detect trends, and allows for the analysis of the relationship between management action (e.g. grazing and land treatments) and conditions.

The deliverables of this project have unlimited potential to be used as information in creating management plans. They provide not only a baseline, but also a replicable technique for future assessment of implemented plans. Because the assessments are at a landscape level, places that have had management success can be documented. These successes can then be used as examples to change management where the results have not been successful. For example, a drainage reach with increasing or stable green vegetation can be identified. Management practices resulting in increases can be examined and then be applied to a stream reach that has decreasing or unstable riparian vegetation.

## **Geographic Overview**

The WPA is 1,481,063 acres, located in Central Montana. The town of Winnett is largely surrounded by it. It is part of sage-grouse Core Areas 3 and 5. The size and location of the project area was selected in consultation with Mathew Comer, wildlife biologist, Lewistown District BLM. The project area was chosen based on high lek densities, public land ownership, and budget constraints. The landscape is characterized by flat to rolling hills topography with intermixed croplands, grasslands and sagebrush dominating the aspect. Sagebrush and thus sage-grouse habitat is associated with clay soils that are not amendable to farming. Sagebrush areas are grazed except for Conservation Reserve Program (CRP) lands. These lands were historically cropland that was converted back to mostly grass species. Elevations range from 2,475 feet to 4,050 feet. Figure 1 shows the location of the study area in relation to nearby towns and its location within Montana.

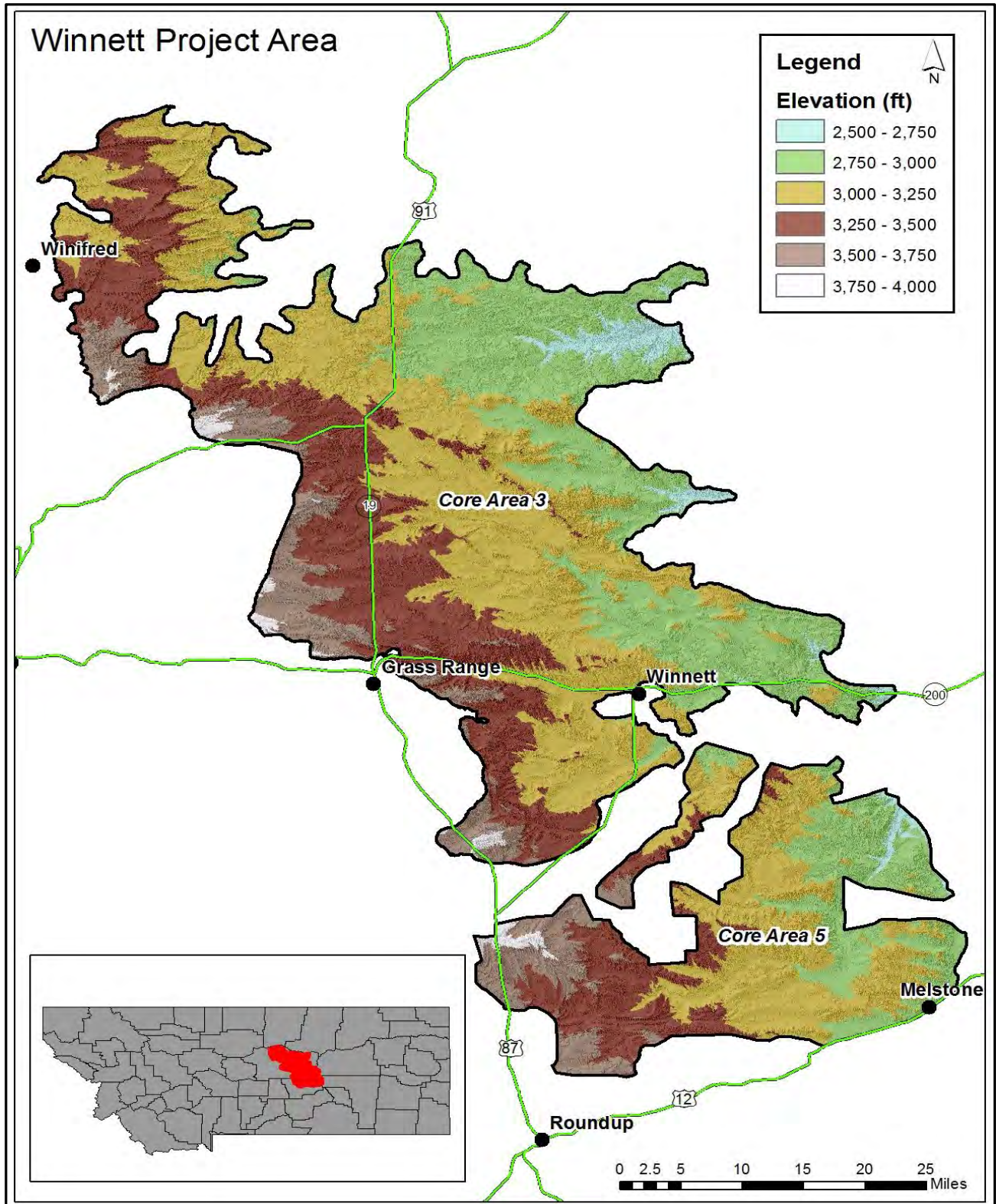


Figure 1. Winnett Project Area

## **Deliverables**

The body of this report is organized in response to the actual deliverables in the contract. For each deliverable, there is an explanation of the method followed by examples of the deliverables in map and/or tabular format.

- A 30m resolution map of dominant landcover and the associated ground sample database
- Continuous cover samples of functional groups of bare ground, herbaceous, litter, and shrub using Ground Based Vertical Photography (GBVP).
- Continuous cover maps of the functional ground cover groups of the entire project area at 1m and 30m resolution
- An assessment of riparian condition and trend over time
- Estimate of upland areas with greater site potential (areas of accumulation)
- An assessment of sagebrush cover and trend over time
- Procedures/information for consistent follow-up monitoring to produce the same results.
- A geographic database that contains all of the above information in common GIS formats

## **Dominant Landcover**

The Northwest Regional Gap Analysis (NWReGap) (Davidson et al., 2009) and Landfire (USDI-USGS Landfire) vegetative classification methods were developed to describe dominant vegetation cover types on a statewide basis by correlating ground samples to satellite imagery. It classifies a landscape by the dominant aspect of vegetation cover (e.g. sagebrush, grasslands, greasewood, conifers, etc.). ORC's dominant landcover map for the WPA was based on the same principles but customized and enriched to provide more focus on mapping the important landcover types of grassland and cover classes of sagebrush at a much finer scale. Figure 2 illustrates the concept of landcover types. The foreground is represented by sagebrush, an area behind the fence is dominated by perennial grass, and the distant hills show areas dominated by conifer.

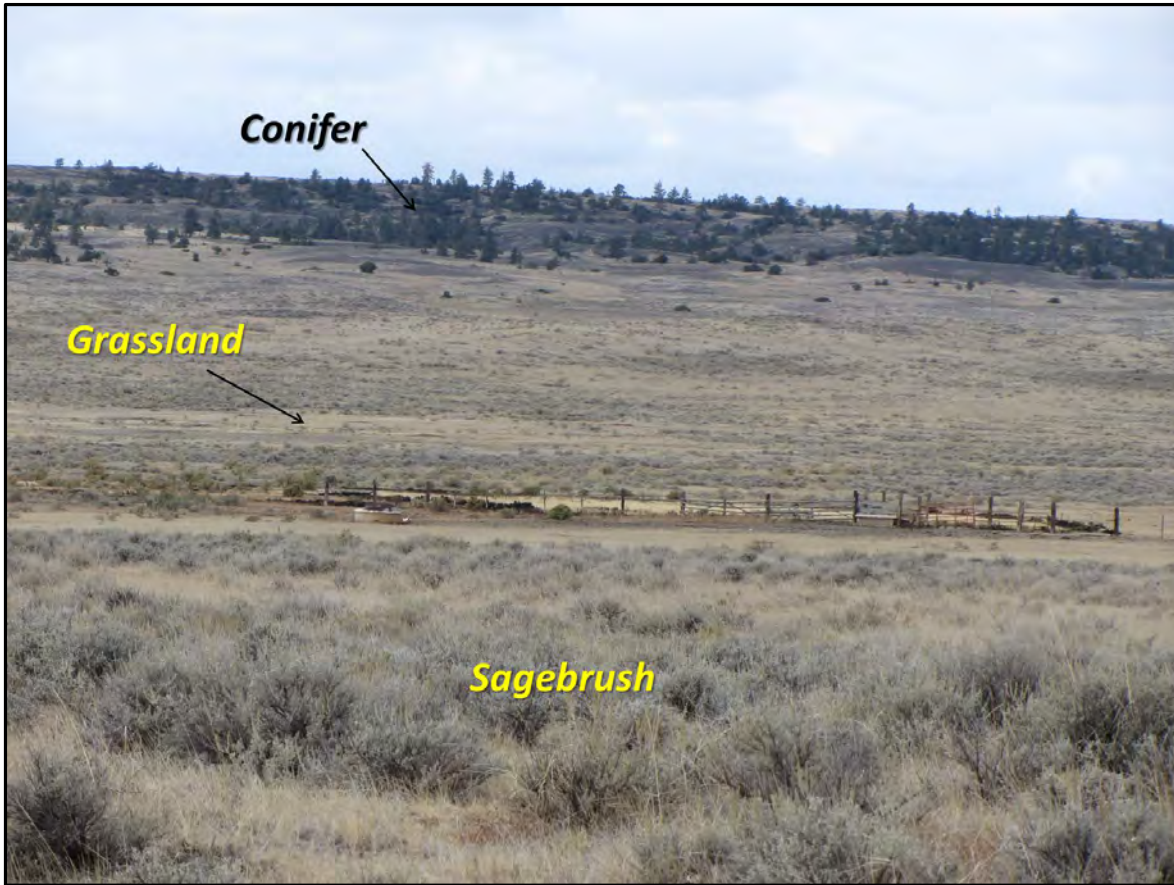


Figure 2. Dominant Landcover

By focusing on and augmenting the samples within the sagebrush and grass landcover types, it was possible to differentiate sagebrush cover into four landcover levels (5-10%, 11-20%, 21-30%, and >30%). These categories are associated with early and late brood rearing as well as winter habitats for sage-grouse. Thus, they have greater spatial resolution of important sage-grouse habitat types. Figure 3 demonstrates the difference in resolution and precision of the Landfire datasets and ORCs landcover product when zoomed in to the same place and geographic extent.

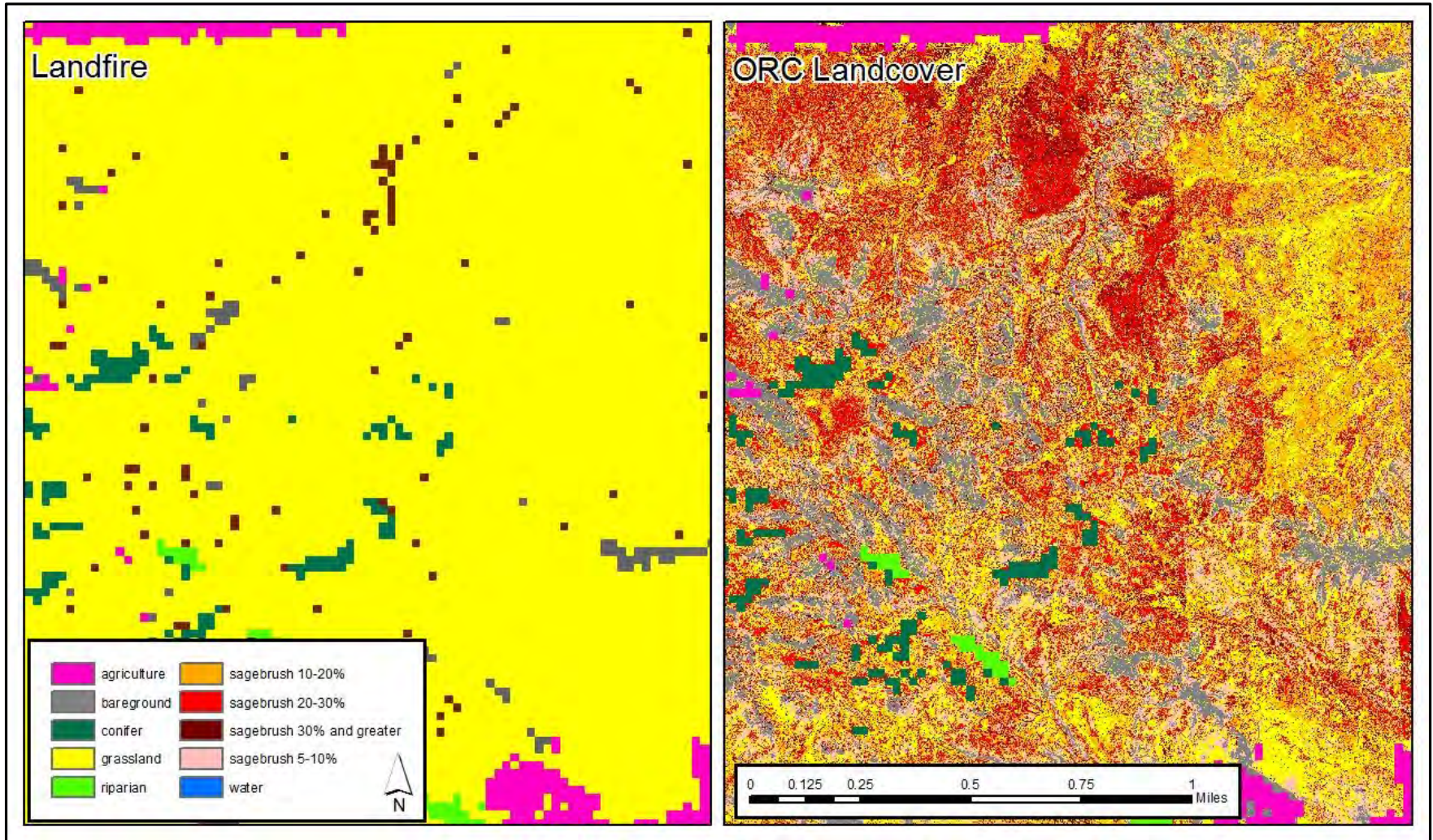


Figure 3. Landfire vs. ORC Landcover



For landcover types not associated with sagebrush and grassland (including riparian, conifer, and agriculture), the Landfire dataset was used for the landcover map. Water bodies were acquired from the 2003 Tiger file obtained from the Montana Natural Resource Information System (Montana NRIS). ORC mapped 1,481,063 acres within the WPA. Table 1 lists the acreage and percent of each landcover class. Figure 4 is the dominant landcover map. This map shows the geographic distribution of the landcover types, including the four sagebrush classes.

Table 1. Acres of Dominant Landcover

<b>Landcover</b>	<b>Acres</b>	<b>Percent</b>
Grassland	536,934	36%
Sagebrush 5-10%	203,161	14%
Sagebrush 10-20%	166,794	11%
Sagebrush 20-30%	197,806	13%
Sagebrush > 30%	57,048	4%
Bare ground	91,918	6%
Agriculture	161,803	11%
Riparian	53,238	4%
Water	2,255	0%
Conifer	9,738	1%
<b>Total</b>	<b>1480695</b>	<b>100%</b>

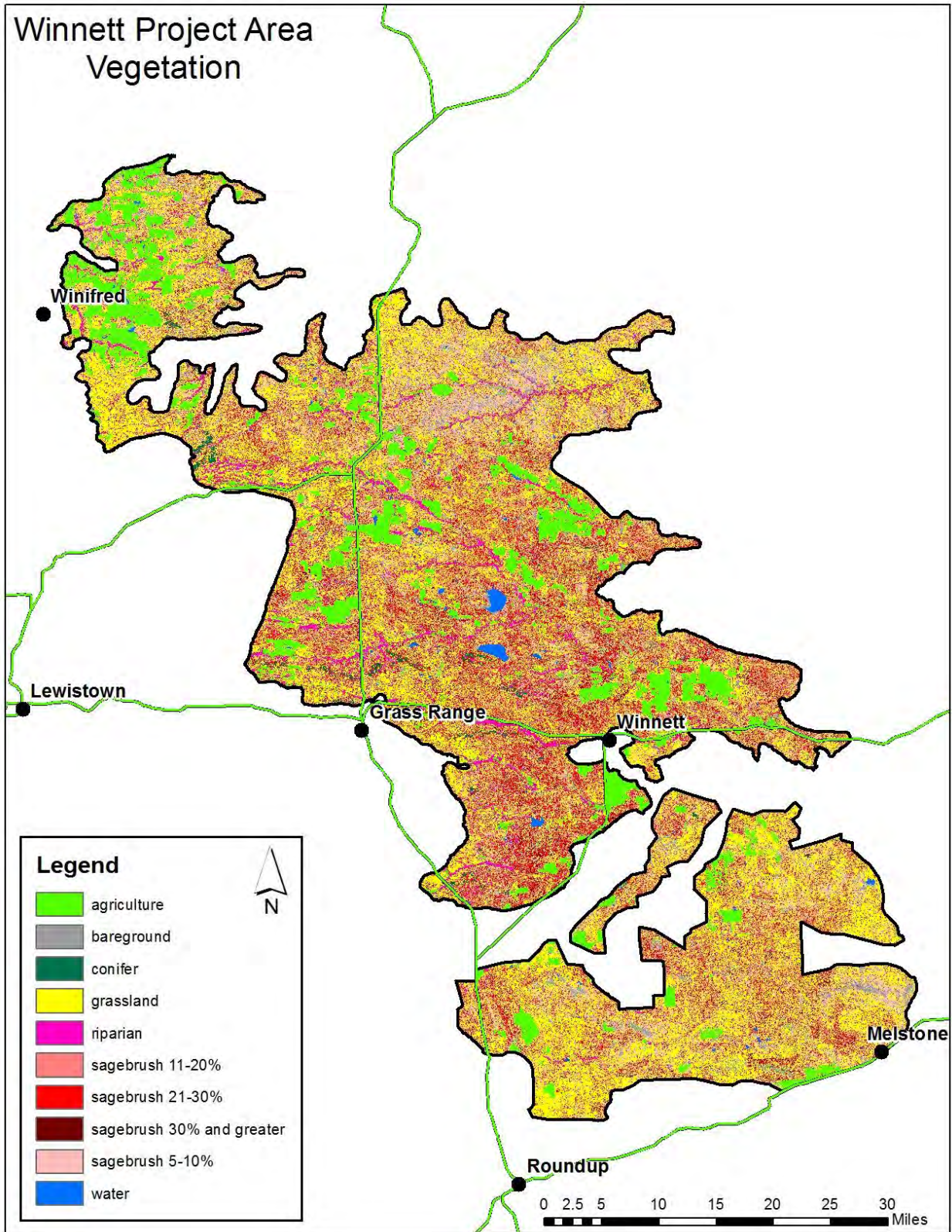


Figure 4. Dominant Landcover

Sage-grouse are sagebrush obligates but seasonally optimize the use of a landscape based on nutritional, cover, and security needs. Percent sagebrush cover offers important seasonal advantages to sage-grouse. Low and moderate density sagebrush with high diversity can be good early brood rearing habitat because of high insect densities while high-density sagebrush is preferred when nutrition demands are lowest and cover very important.

Grass height has been shown to be important to increased nest success and population growth in a Montana study (Taylor et al. 2011). Precipitation, grazing, and rangeland health determine grass height annually. Our methodology cannot measure grass height directly but does measure bare ground. Bare ground is a very important indicator of rangeland health and the effectiveness of precipitation. When bare ground is within the standard for the range site then infiltration of precipitation is within a normal range. Annual weather condition cannot be affected by management but bare ground can be. As bare ground is decreased then plant growth, length of green vegetation period, and duration of stream flow can be optimized for the site potential. Thus, measuring bare ground and being able to detect its change is very important in knowing how management is affecting habitat.

Cropland and riparian areas can serve as important late brood rearing areas to provide green plants, which is especially important in drought years. Sage-grouse prefer to use the edges of cropland near sagebrush cover. Spatial diversity and mixing of important different sage-grouse habitat conditions within a few miles can be positive for sage-grouse because it can minimize their movement to meet their seasonal needs and minimize mortality due to predation.

Our fine scale spatially explicit map shows the intermixing of these dominant landcover types and resource managers can infer what areas would be best for preservation, improvements, and where it would most advantageous to convert agriculture into habitat to enhance sage-grouse population. Converting large blocks of sagebrush to agricultural production is the largest threat to sage-grouse population in the State of Montana.

## Continuous Cover Samples and Maps

ORC's continuous cover mapping product denotes the percent cover of bare ground, herbaceous, and shrub cover over the entire project area. The process began with the collection of many ground samples in the summer of 2013 across the landscape using the GBVP platform. The GBVP images were then classified into the four basic ground cover components of bare ground, herbaceous, shrub, and litter cover. Next, a correlation was developed between the GBVP samples and NAIP imagery. The NAIP imagery covered the entire project area. These steps created a continuous cover map for the project area. The following dialog describes the individual steps of this process and strengths of the relationships developed between the imagery (Sant et al. 2014).

A total of 260 GBVP images were acquired and analyzed for the WPA. The GBVP platform consisted of a camera ten to twelve feet above the ground that took a picture that was approximately 6m by 7m. High precision GPS marked the center point of the of the GBVP image. Figure 5 is a photo showing the GBVP platform.



Figure 5. The GBVP Platform

The resulting photograph had a pixel resolution of 2mm resulting in 18 million sample points per GBVP image. Each pixel in the image was then categorized into bare ground, litter, shrub, and herbaceous cover. Figure 6 is an example of a GBVP image and its classification.

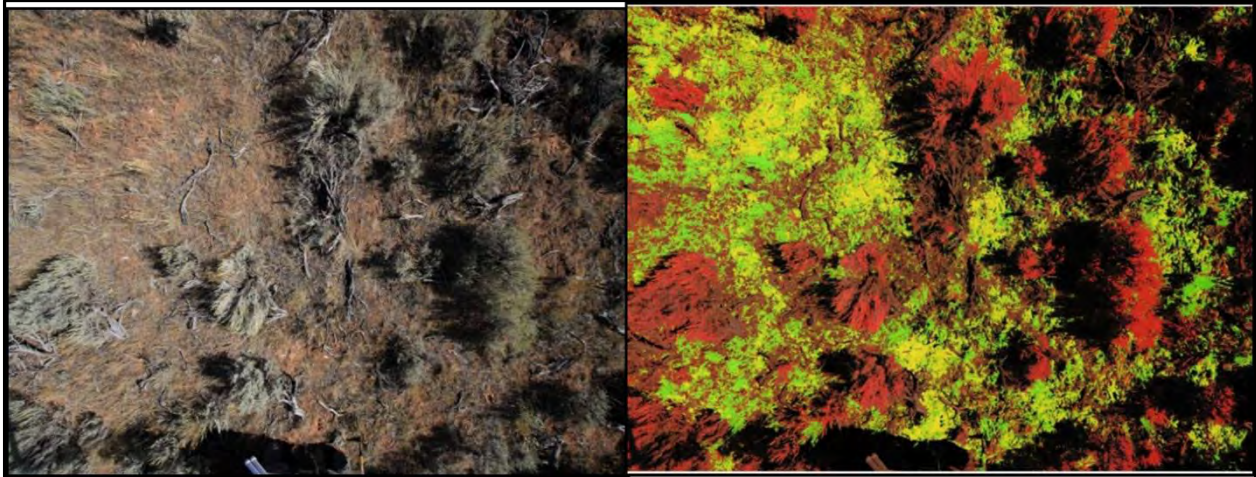


Figure 6. GBVP Image and Its Classification

NAIP imagery was flown at nearly the same time as the GBVP points collected for the WPA in the summer of 2013. A strong correlation was developed between the GBVP imagery and the 2013 NAIP imagery using Classification and Regression Tree (CART) analysis. The correlation was used to create a 1m assessment of the basic continuous cover groups across the WPA. To assess the accuracy of the continuous cover products 20% of the GBVP samples were withheld from the model and then compared to the predicted continuous cover values. Table 2 lists the R<sup>2</sup> values of these samples for the continuous cover types across the WPA.

Table 2. Correlation Coefficient (R<sup>2</sup>) of Withheld GBVP to 1m NAIP Modeled Continuous Cover

	R <sup>2</sup>
<b>Bare ground</b>	0.84
<b>Herbaceous</b>	0.73
<b>Shrub</b>	0.67
<b>Average</b>	0.75

The accuracy of the shrub continuous cover was slightly below ORC’s target level of having an R<sup>2</sup> above 0.70. Extensive ground-truthing of the shrub product determined that it was generally very accurate. The discrepancies were limited to transition areas between shrub and grasslands, riparian areas, and agricultural areas. Note the high level of detail of the shrub continuous cover in Figure 7. The polygon indicates a sagebrush removal treatment that was seeded to crested wheatgrass. This treatment that is a few years old generally shows sagebrush cover as being between 1 and 5%. Note the error in the line of the outside perimeter of the treatment.

Figure 8 illustrates the accuracy of the herbaceous and bare ground continuous cover mapping. Roads show up in the low herbaceous category (1-10%) and high bare ground category (80-100%). Drainage ways that likely are dominated by riparian vegetation tend to be classified in the greater than 80% category for herbaceous cover and the less than 10% category of bare ground.

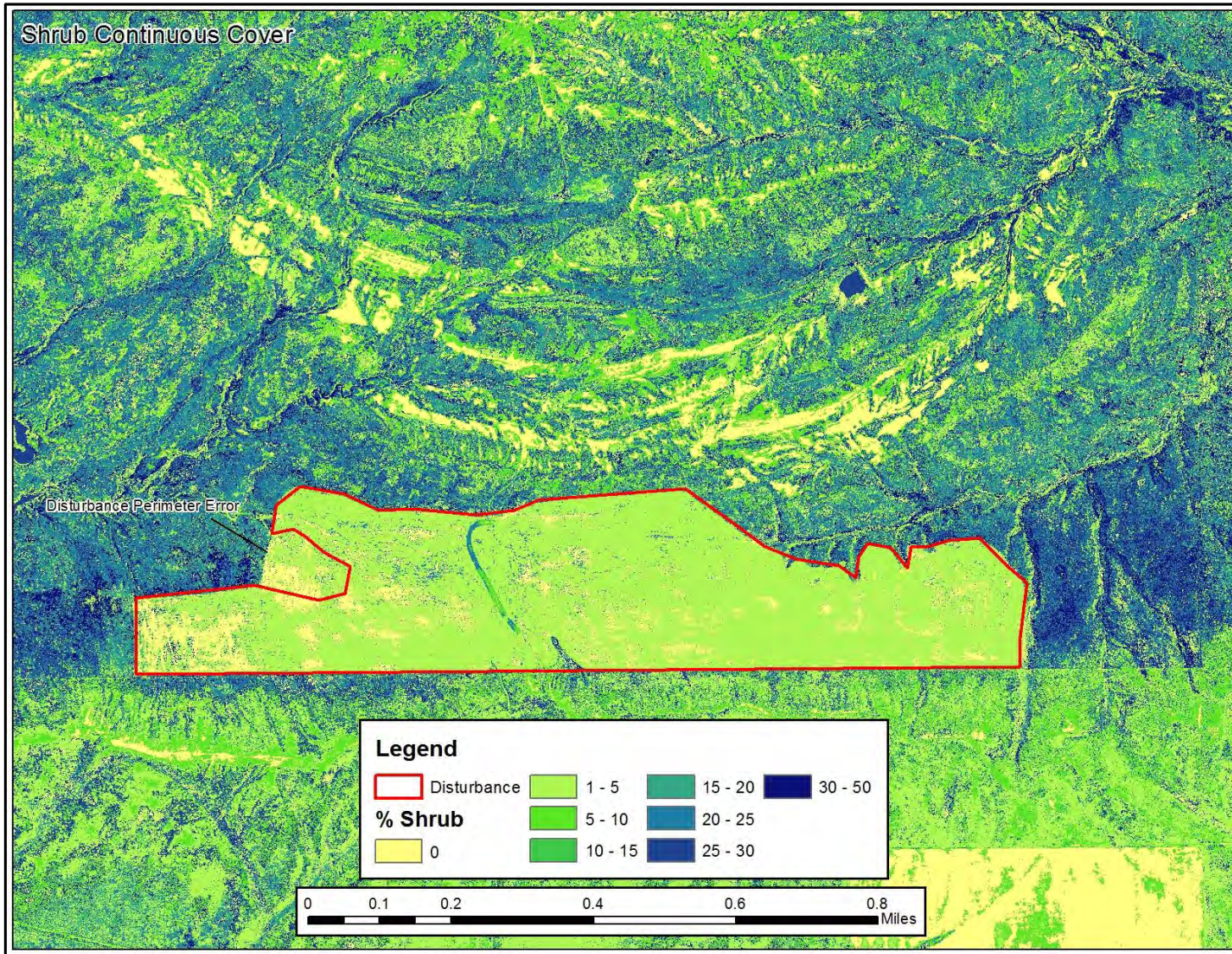


Figure 7. Shrub Continuous Cover Example

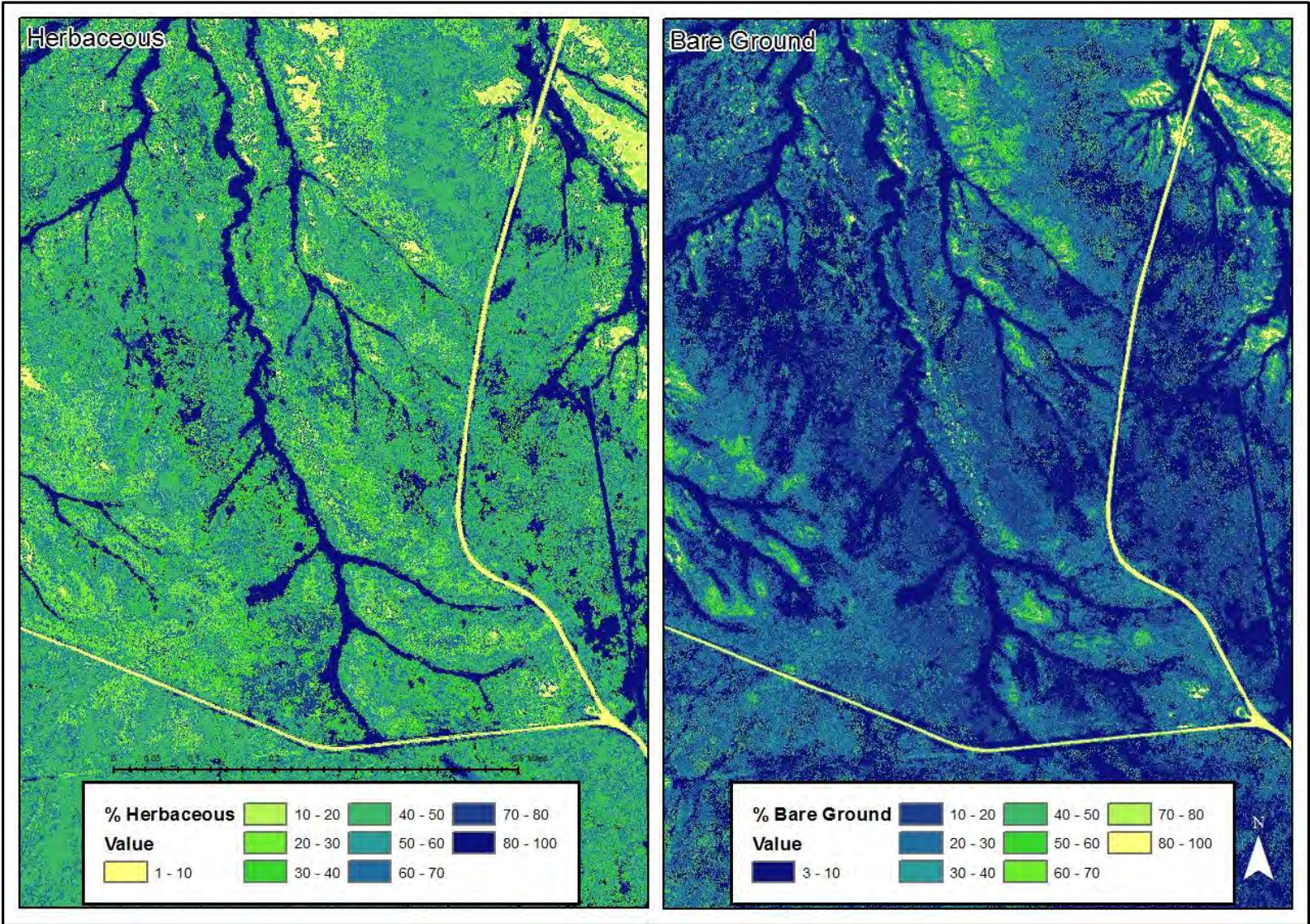


Figure 8. Herbaceous and Bare Ground Continuous Cover

## Riparian Assessment

The riparian deliverable was an assessment of condition and trend over time on 32 stream miles. The stream segments were determined by Mathew Comer, Wildlife Biologist, Lewistown District BLM. The location and names of these streams are shown in Figure 9. Even though 32 stream miles were specified in the contract, ORC determined that there were actually 46 stream miles that were part of the analysis. The following section briefly describes the analysis process with maps and charts of the results.



Figure 9. Riparian Analysis Location



To compare changes of riparian vegetation over time, it was first necessary to approximate topographically where there is elevated site potential along the drainages. ORC calls this area the Potential Riparian Area (PRA). For the purposes of this report, the PRA is the area along the drainage where there is potential to have a seasonal water table or areas that have significantly deeper soils which could support vegetation that needs more soil moisture throughout the growing season.

ORC delineated the PRA using 1m NAIP Color Infrared (CIR) imagery and a combination of self-learning software and visual interpretation. The purpose of the remotely delineated PRA was to ensure geographic consistency of measured vegetation through time within the PRA. This allows for precise temporal analysis of condition and trend of the PRA.

The PRA was then divided into reaches. Stream reaches were defined and partitioned by changes in geomorphological conditions (e.g., gradient, stream substrate, and valley shape) and/or by pasture boundaries. Within these stream reaches, the ground cover conditions of the PRA were analyzed using the 2009 NAIP imagery. The amount of riparian vegetation, water, upland vegetation, and bare ground within each reach is indicative of how well the reach's PRA is functioning. Riparian vegetation during the late summer indicates a greater amount of soil moisture while upland vegetation and bare ground indicates a lack of soil moisture. Figure 10 illustrates the PRA in the left hand frame, bright red is indicative of riparian vegetation. The right hand frame also depicts the PRA as well as the riparian classification. Note the middle reach has considerably less riparian vegetation than the reaches around it.

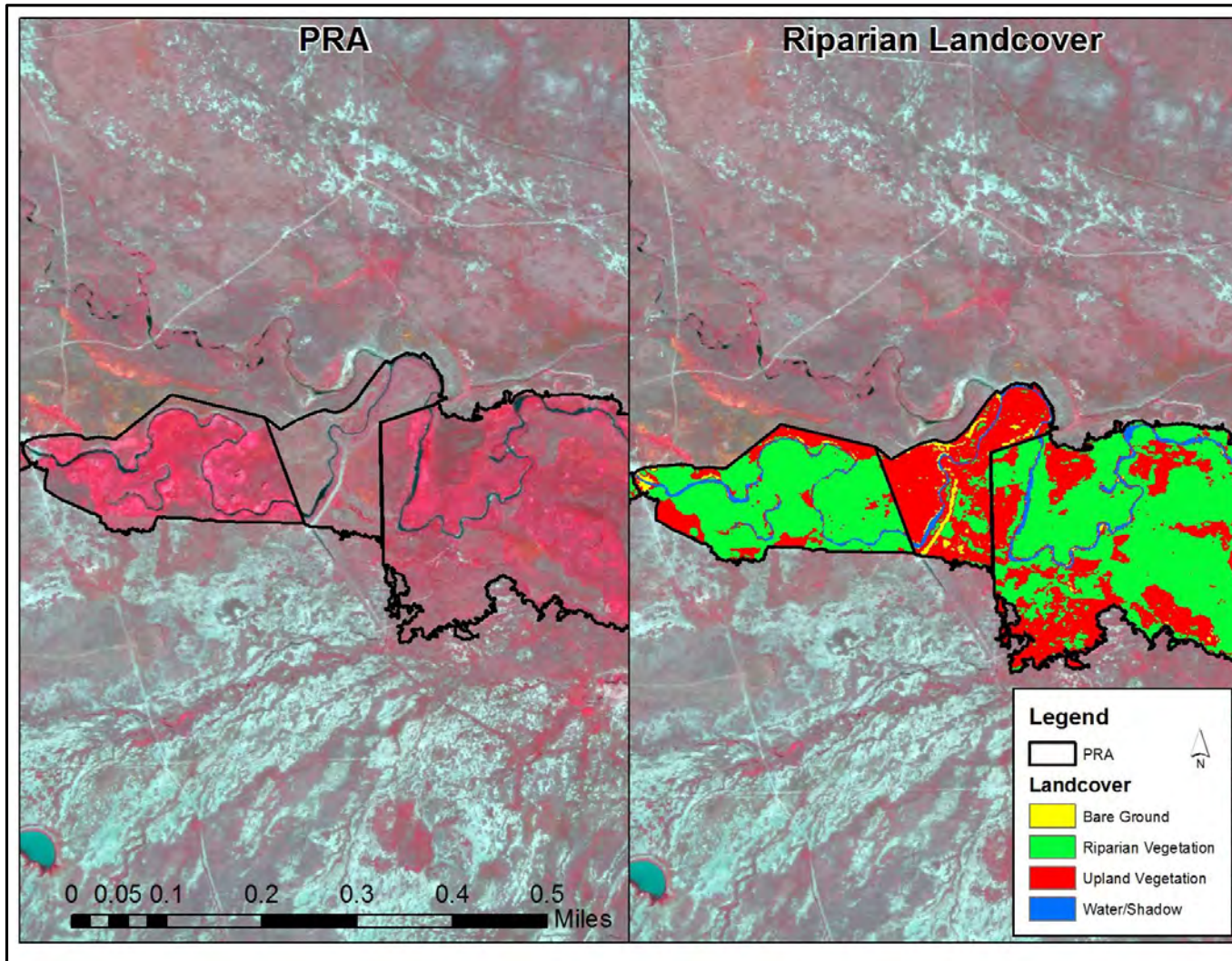


Figure 10. PRA and Landcover Example (Lower Ford Creek)

Figure 11 illustrates the results of the 2009 NAIP riparian analysis on all of the streams. The percent of riparian vegetation within each reach is shown as a three class graduated color map of 0-20%, 21-40%, and 41-100% riparian vegetation. The three classes are likely correlated to the BLM's Proper Function and Condition (PFC) assessment categories. However, without historical PFC data to fine tune the model to fit the PFC assessment there is possibly error in this assumption. Upper and Lower Ford Creek have a lot of riparian vegetation and the other creeks have less riparian vegetation.

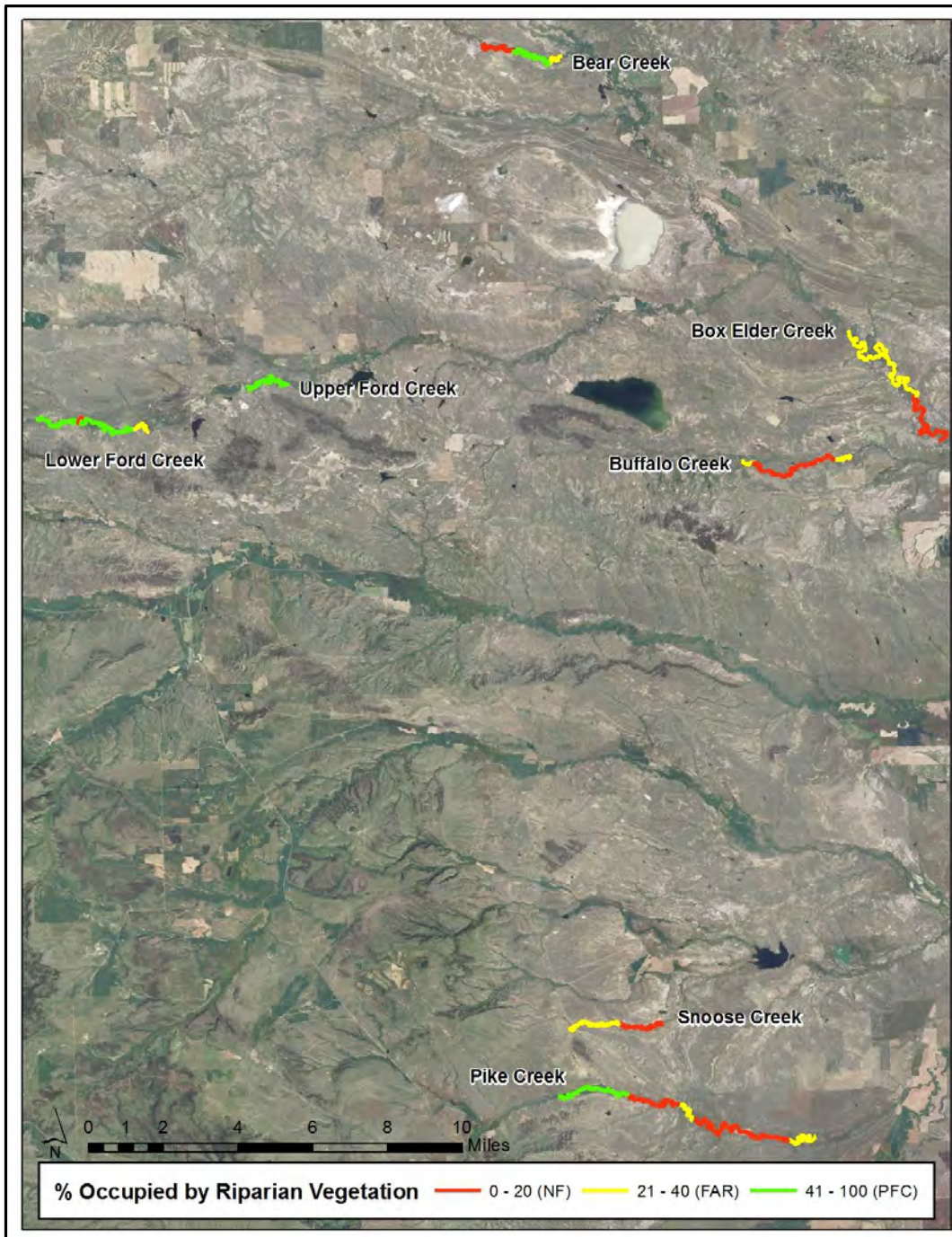


Figure 11. Analysis of Riparian Areas with 2009 NAIP Imagery

The 1m NAIP imagery analysis of riparian areas above is very accurate and precise in its depiction of riparian vegetation. What it is lacking is the ability to assess condition and trend of riparian areas over time. In order to determine condition and trend over time, it was necessary to use Landsat 30m imagery. Using the NAIP classification as the training dataset, a model was developed with 30m Landsat imagery (Booth et al. 2012). This model had an  $R^2$  value of 0.85 meaning the Landsat depiction of riparian vegetation was very similar to the NAIP depiction. Using 38 cloud free images from 1975-2011, the condition and trend of all of the riparian reaches were analyzed. Figure 12 shows the number of reaches in each of the three categories described above in each analyzed year. Note that the number of reaches in the 40-100% category has been drastically reduced after 1993 versus before 1993. This figure suggests that there was a climatic disturbance in 1993 that negatively affected a high percent of the stream reaches. These reaches still have not fully recovered. This reduction in their condition could have had negative effects of sage-grouse late brood rearing habitat.

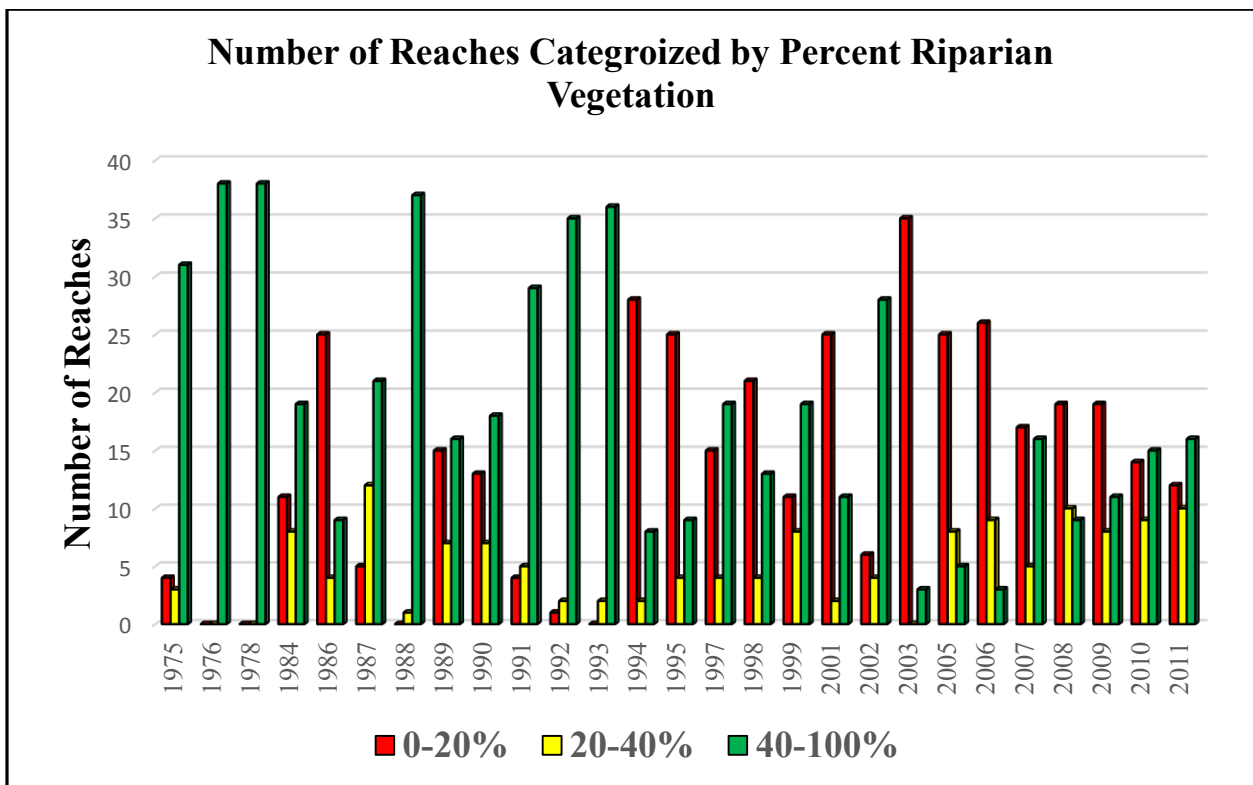


Figure 12. Condition and Trend of Riparian Areas 1976-2011

## **Areas of Accumulation**

Areas of accumulation on uplands are sites that have a higher potential for overall plant production compared to surrounding areas. These are usually wetter places but cannot really be considered riparian areas. Vegetative responses to management changes will likely show up in these areas first. If habitat improvements were ever considered, these areas would likely have more response because of their site potential. Figure 13 shows the NAIP imagery and the areas of accumulation deliverable. Note the reddish areas in the NAIP imagery in the left hand frame are where the areas of accumulation are and are correlated to the yellow in the right hand frame which is the estimated location of areas of accumulation.

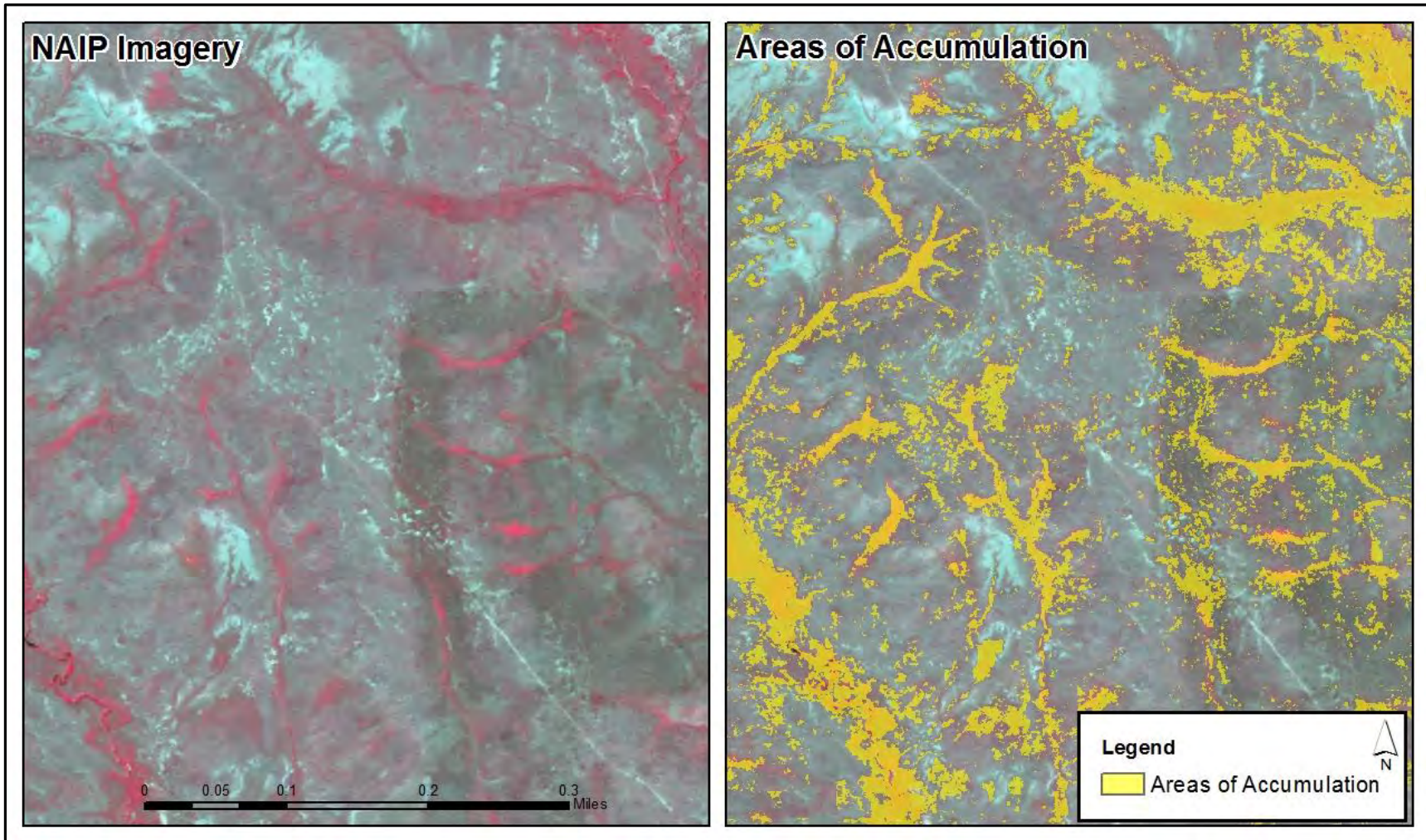


Figure 13. Area of Accumulation Example

## An Assessment of Sagebrush Cover and Trend over Time

The assessment of sagebrush cover was limited to an area of 25,000 acres. The analyzed area was determined by Matthew Comer, Wildlife Biologist, Lewistown District BLM. Figure 14 shows the location of the analyzed area. Within the analyzed area there was a large proportion of agricultural lands. These areas were masked out for the analysis. The inset of Figure 12 illustrates the extent of the masked out agricultural lands.

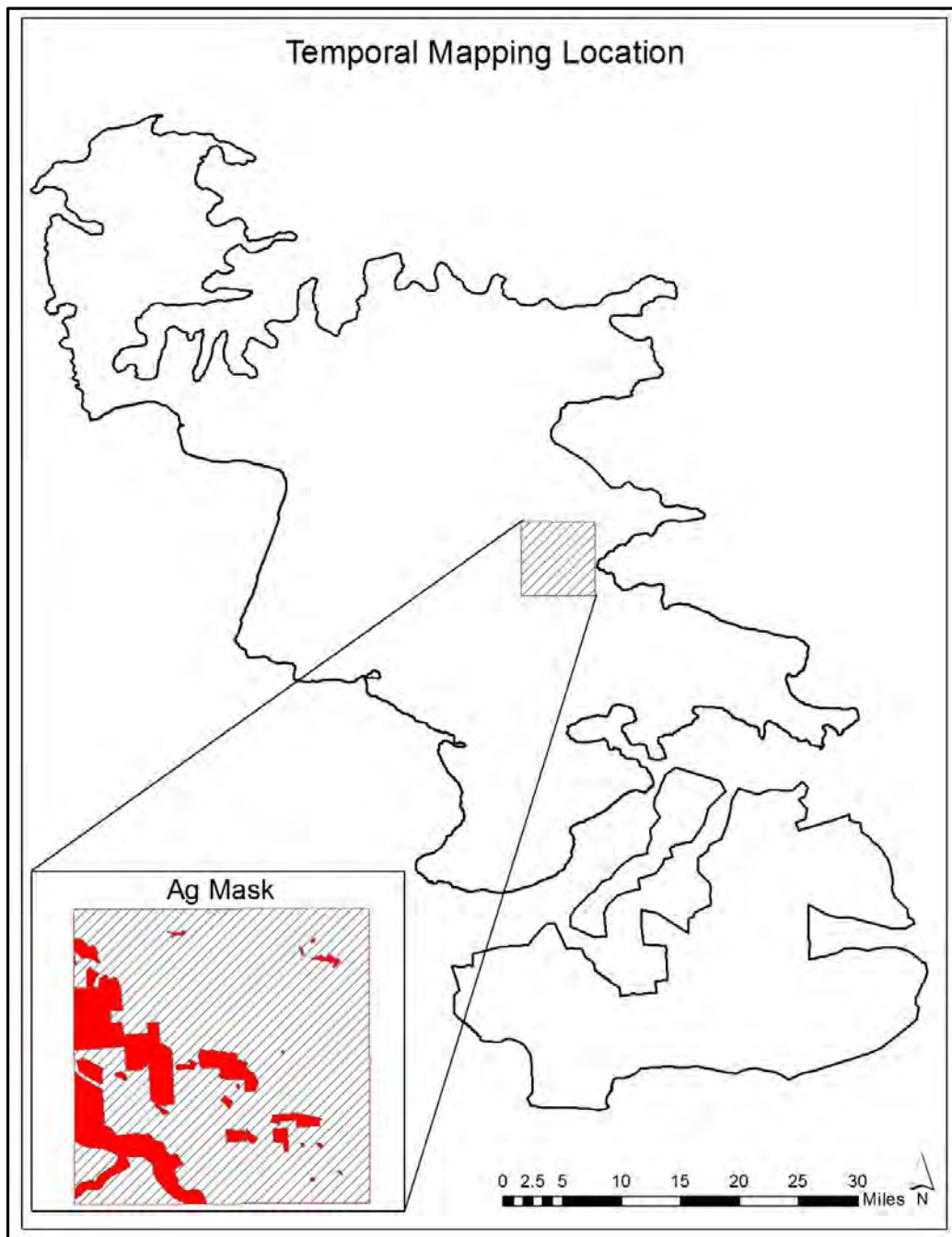


Figure 14. Temporal Mapping Location

To assess sagebrush cover change through time it was necessary to use 30m Landsat imagery. The methodology for processing and analyzing the imagery is discussed in length in Sant (2014). Cloud free high quality imagery is necessary to determine changes in cover over time. For the WPA, Landsat imagery was acquired in late June or early July from 1986, 1993, 2004, 2009, and 2013. Figure 15 illustrates the sagebrush cover in each of the analyzed years. Generally, there are only modest changes with slight ebbs and flows in sagebrush cover over this time period. This is what you would expect to see as sagebrush cover is usually fairly static. The one exception is in the Southwest corner where in 2004 sagebrush looks like it is reduced and then comes back in 2009 and 2013.

Even though it was not specified in the deliverables bare ground and herbaceous cover maps were also provided along with the sagebrush cover maps. The bare ground and herbaceous maps show a lot more year to year variability as would be expected as herbaceous matter is highly variable based on if and when it rains. ORC believes the sagebrush, herbaceous, and bare ground maps to be representative of conditions within the analysis area. However, with no historical ground data to check the accuracy of these predictive maps no assurance of accuracy can be made.



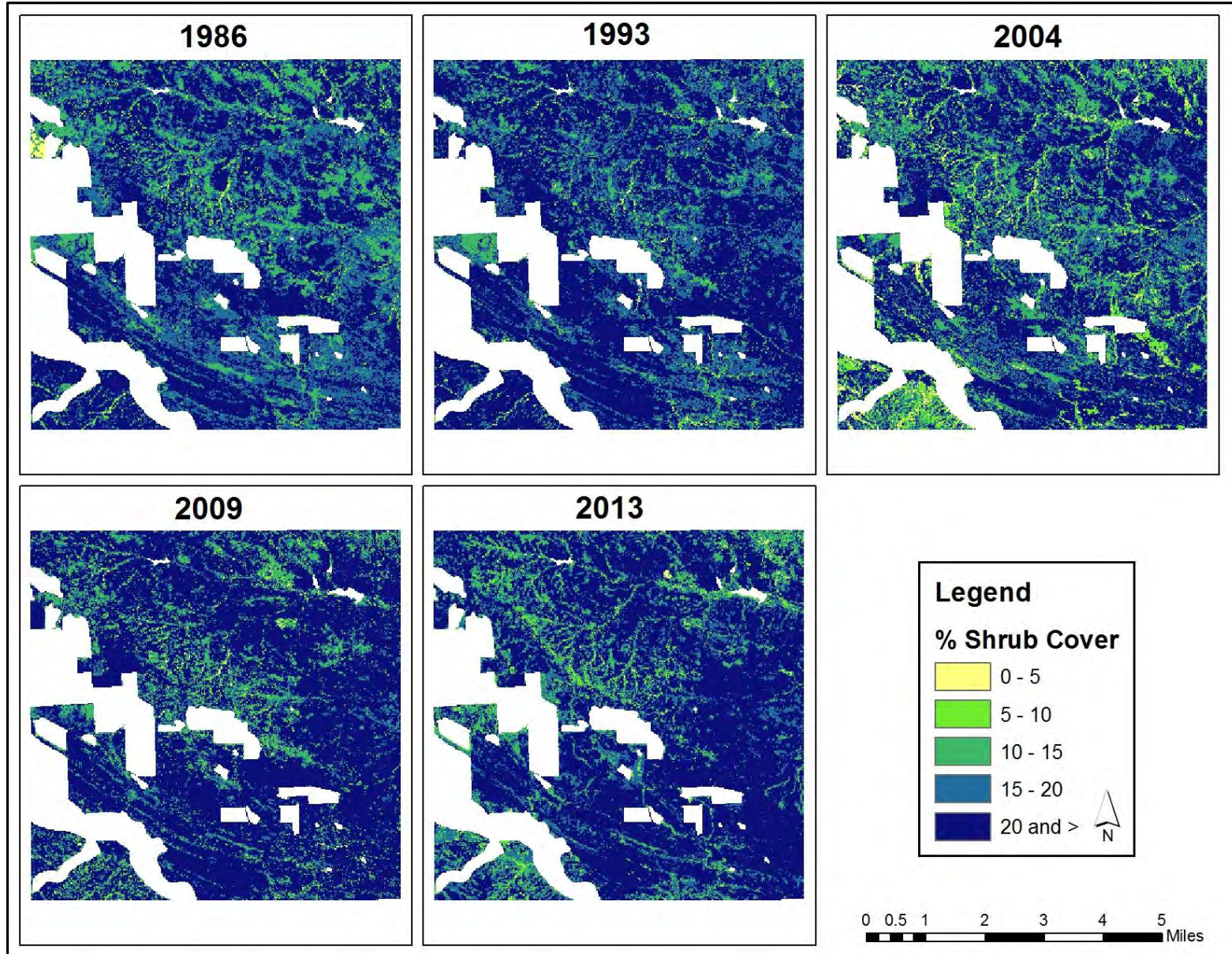


Figure 15. Temporal Analysis of Sagebrush Cover

## Follow-up monitoring

Monitoring is the key component in adaptive management. Adaptive management is an iterative process of making an initial assessment (which is what this project is), making management changes based on that assessment, and then monitoring the results of that management action. Because of the necessity of future monitoring a write-up of how to proceed with future monitoring was requested as one of the deliverables. The procedures and information for consistent follow-up monitoring to produce the same results for the WPA are described in this section.

There are two processes with different levels of cost and accuracy that can be employed for future upland monitoring. The first process uses 30m Landsat imagery. This process is similar to what was used to provide the temporal products for this project. The fine scale data collected in 2013 can be leveraged to 30m Landsat data and then modeled into the future for each successive year when there are high quality cloud free images available. In order to ensure the accuracy and precision of this information, some level of field ground truthing should be incorporated. This could include line transects, ocular estimates, or known treatments that cover 100m<sup>2</sup>. This process is fairly cost efficient with a limited amount of ground sampling. Because it is based on 30m Landsat imagery, it is less precise geographically.

The second process repeats the method used to create the 1m continuous cover products for this project. The GBVP images would be re-taken at the same locations and then reclassified to determine their current cover conditions. This process would need to be timed so it occurred within the same growing season of a NAIP flight. NAIP imagery is acquired for each state roughly every three years. The GBVP classifications would then be used to create new 1m continuous cover maps for the WPA with the current cover conditions. This process is more expensive because it includes much more extensive ground sampling. Because it is based on 1m NAIP imagery, it is much more precise geographically.

Using GBVP imagery as the most basic unit of sampling is advantageous over any other kind of monitoring as it preserves the assessment in the photograph. For example the conditions of a specific line transect can never be perfectly repeated. Sun angle, wind velocity, and simply how the transect falls means the line transect can never be read exactly the same again. The GBVP image captures and preserves ground conditions as they are at that precise moment. This image can then be revisited and analyzed differently with advanced technology or for other resource questions that may arise. Additionally, these photos are far more efficient in sampling landscapes and much more precise in determining ground cover than line transects (Pilliod and Arkle 2013).

Follow-up efforts in riparian monitoring are generally very cost effective, precise, and timely. Because the PRAs have been created for this project all that is needed for future monitoring of these same riparian areas is imagery. Because the extent of the PRA does not change, landcover changes within the PRA can be compared over time. Future monitoring can be accomplished with 30m Landsat imagery using the same techniques described above. Additionally, new classification can be made within the PRA for every NAIP image acquisition. If NAIP imagery

is not available in a specific year, 1m satellite imagery (e.g., Ikonos, Quickbird, Pleides) can be purchased along riparian areas for a very reasonable cost.

## Geographic Database

All of the data collected and created for the WPA were organized and placed on an external hard drive which contains geographic databases that can be accessed via ESRI ArcGIS products. Figure 16 is a visual diagram of the organization of the structure. Following the diagram is an in-depth description of each of the pieces of the geographic database. Note that some of the deliverables call for 30m products. Because of the timing and available imagery for this project, all upland products were delivered at the 1m scale instead. The 1m scale data being more accurate, precise, and descriptive of the WPA than 30m data would have been. Metadata for each geospatial file can be accessed in ESRI ArcMap under the description tab.

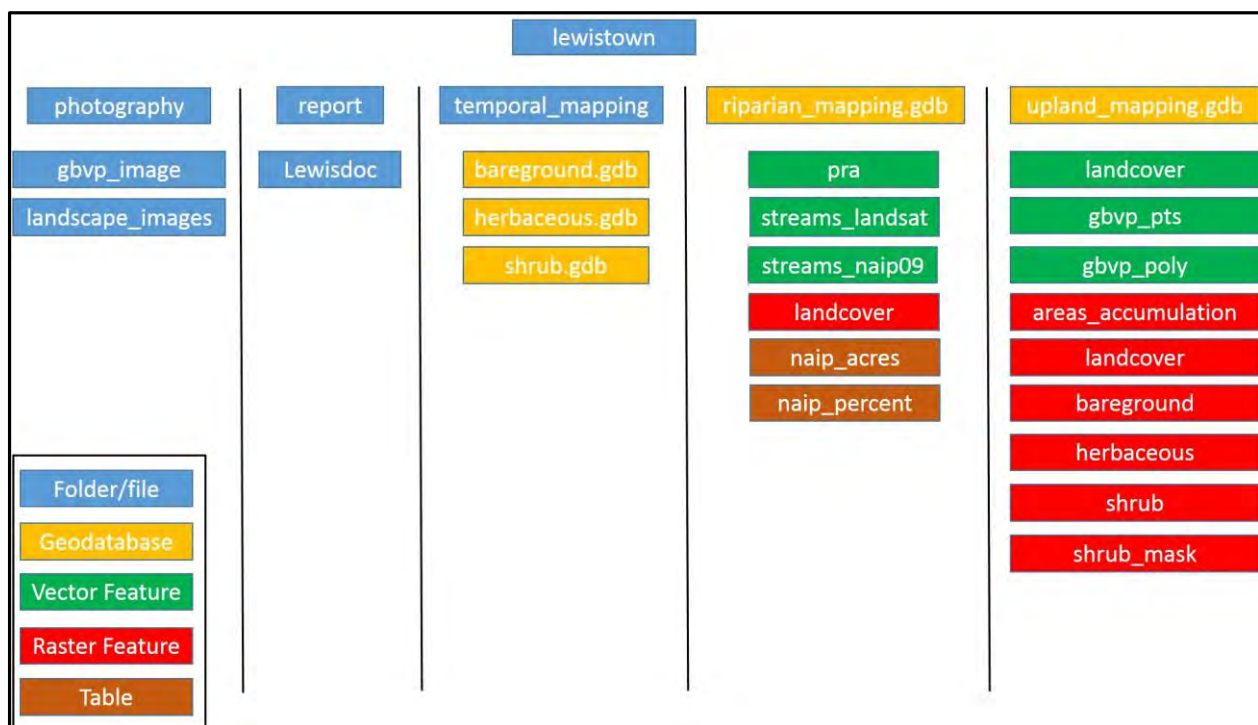


Figure 16. Geographic Database Schematic

**Photography**-This folder contains the landscape and GBVP photographs taken for the project

- Gbvp\_images-GBVP images in .tif format. These images are named to coordinate with the gbvp\_pts and gbvp\_poly features.
- Landscape images-A landscape photograph was taken at each sample site with an obvious landmark in the background. These images are in .jpg format and are named to coordinate with the gbvp\_pts and gbvp\_poly features.

**Report**-This folder contains this report in .doc and .pdf format

**Temporal\_mapping**-This folder contains three ESRI file geodatabases labeled bareground, herbaceous, and shrub.

- Bareground.gdb-There are five raster datasets within this geodatabase. They are bg86, bg93, bg04, bg09, and bg13. Each is a 30m resolution representation of bare ground for the year associated with the raster's name. To visualize in ESRI ArcMap, symbolize by value.
- Herbaceous.gdb-There are five raster datasets within this geodatabase. They are herb86, herb93, herb04, herb09, and herb13. Each is a 30m resolution representation of herbaceous cover for the year associated with the raster's name. To visualize in ESRI ArcMap, symbolize by value.
- Shrub.gdb-There are five raster datasets within this geodatabase. They are shrub86, shrub93, shrub04, shrub09, and shrub13. Each is a 30m resolution representation of shrub cover for the year associated with the raster's name. To visualize in ESRI ArcMap, symbolize by value.

**Riparian\_mapping.gdb**-The datasets contained in this ESRI file geodatabase describe riparian conditions with current (2009) and temporal (1975-2013) analysis.

- PRA-A vector polygon dataset that geographically depicts the PRA and reaches of each analyzed stream. The tabular data associated with this feature dataset includes the name of the reach and how many acres are in that reach's PRA.
- Landcover-A 1m resolution raster dataset that depicts the landcover within the PRA of all of the analyzed streams derived from the 2009 NAIP. The landcover classification includes riparian vegetation, bare ground, upland vegetation, and water/shadow. To visualize in ESRI ArcMap, symbolize by landcover.
- Streams\_naip09-A vector line dataset that geographically depicts the stream and reaches of each analyzed stream. There is a relationship between this feature and the tables named naip\_acres and naip\_percent. These tables contain the information derived from the 2009 NAIP classification. When streams\_naip09 is visualized in ESRI ArcMap, each reach can be clicked on with the inquire tool and the percent and acreage of the classification will be displayed in the results window.
- Streams\_landsat-A vector line dataset that geographically depicts the stream and reaches of each analyzed stream. The tabular data for this feature dataset includes the percent riparian vegetation of that reach's PRA derived from the 30m Landsat imagery.

**Upland\_mapping.gdb**-The datasets contained in this ESRI file geodatabase include the field samples and the continuous cover deliverables.

- Project\_area-A polygon feature that geographically depicts the WPA.
- Gbvp\_poly-A polygon feature that geographically depicts the footprint of the GBVP image. The tabular data includes the percent cover of bare ground, litter, herbaceous, and shrub cover within the footprint. The GBVP photo can also be accessed either through the table or by using the inquire tool.
- Gbvp\_pts-A point feature that geographically depicts the center point of the GBVP image. The tabular data includes the percent cover of bare ground, litter, herbaceous, and shrub cover within the footprint. The landscape photo can also be accessed either through the table or by using the inquire tool.

- Landcover-A 1m depiction of the landcover for the WPA. This dataset was derived from the 2013 NAIP imagery. To visualize landcover in ESRI ArcMap, symbolize by landcover
- Shrub-A 1m depiction of the shrub cover for the WPA. This dataset was derived from the 2013 NAIP imagery. To visualize shrub cover in ESRI ArcMap, symbolize by value. This dataset represents the shrub cover estimate for the entire WPA.
- Shrub\_mask-A 1m depiction of the shrub cover for the WPA. This dataset was derived from the 2013 NAIP imagery. To visualize shrub cover in ESRI ArcMap, symbolize by value. This dataset represents the shrub cover estimate but has had agricultural, riparian, and conifer landcover areas masked out to represent 0% shrub cover.
- Herbaceous-A 1m depiction of the herbaceous cover for the WPA. This dataset was derived from the 2013 NAIP imagery. To visualize herbaceous cover in ESRI ArcMap, symbolize by value. This dataset represents the herbaceous cover estimate for the entire WPA.
- Bareground-A 1m depiction of the bare ground for the WPA. This dataset was derived from the 2013 NAIP imagery. To visualize bare ground in ESRI ArcMap, symbolize by value. This dataset represents the bare ground estimate for the entire WPA.
- Areas\_accumulation-A 1m depiction of the areas of accumulation for the WPA. This dataset was derived from the 2013 NAIP imagery.

## **Conclusions**

The deliverables from this project can be correlated to current sage-grouse population data. New relationships can then be discovered between vegetative conditions and sage-grouse population trends. This can lead to future management changes. With ORC's relatively inexpensive technology to acquire and assess vegetative conditions, it can be repeated after five or ten years. Success of management can be evaluated so that concerned publics can learn, communicate, and develop new ideas to enhance sage-grouse populations and ranching economics.

## References

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- Taylor, R.L., Walker, B.L., Naugle, D.E. and Mills, L.S. (2012). Managing multiple vital rates to maximize greater sage-grouse population growth. *The Journal of Wildlife Management*, 76:336-347.



**From:** Roberson, Edwin  
**Sent:** Sunday, February 8, 2015 3:15 PM  
**To:** James Lyons  
**Cc:** Joe Stout; Michael Hildner  
**Subject:** Fwd: Corrected GRSG Resolved Issues Document\_v2  
**Attachments:** SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_NCID\_Named.pdf; Issues Resolved\_ID 2.3.15 final.docx

JIm,

Here is the corrected guidance for Idaho. I think this may be the only one. See you Friday.

----- Forwarded message -----

From: **Hildner, Michael** <[mhildner@blm.gov](mailto:mhildner@blm.gov)>  
Date: Tue, Feb 3, 2015 at 3:04 PM  
Subject: Corrected GRSG Resolved Issues Document\_v2  
To: Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
Cc: Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>, Glen Stein <[gstein@fs.fed.us](mailto:gstein@fs.fed.us)>, "Dillon, Madelyn - FS" <[mdillon@fs.fed.us](mailto:mdillon@fs.fed.us)>, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>, Frank Quamen <[fquamen@blm.gov](mailto:fquamen@blm.gov)>

Hi BLM-ID,

In coordinating with FS, we noticed that the GRSG guidance document you received was missing one piece of direction. I have added the following bullet point to your SFA guidance :

"· Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)– these areas will be treated as PHMA, with the SFA management actions for this FS-land."

I've also attached a map that specifically identifies these two areas for your reference (please ignore all the other identified areas on the map with regard to the above bullet point).

I have reattached the guidance for purposes of version control, but this is the only change you will see in it. Sorry about the oversight, and thanks a lot as always. Let me know if you have any questions.

--


Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
[mhildner@blm.gov](mailto:mhildner@blm.gov)



# Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas

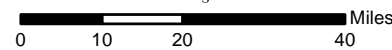
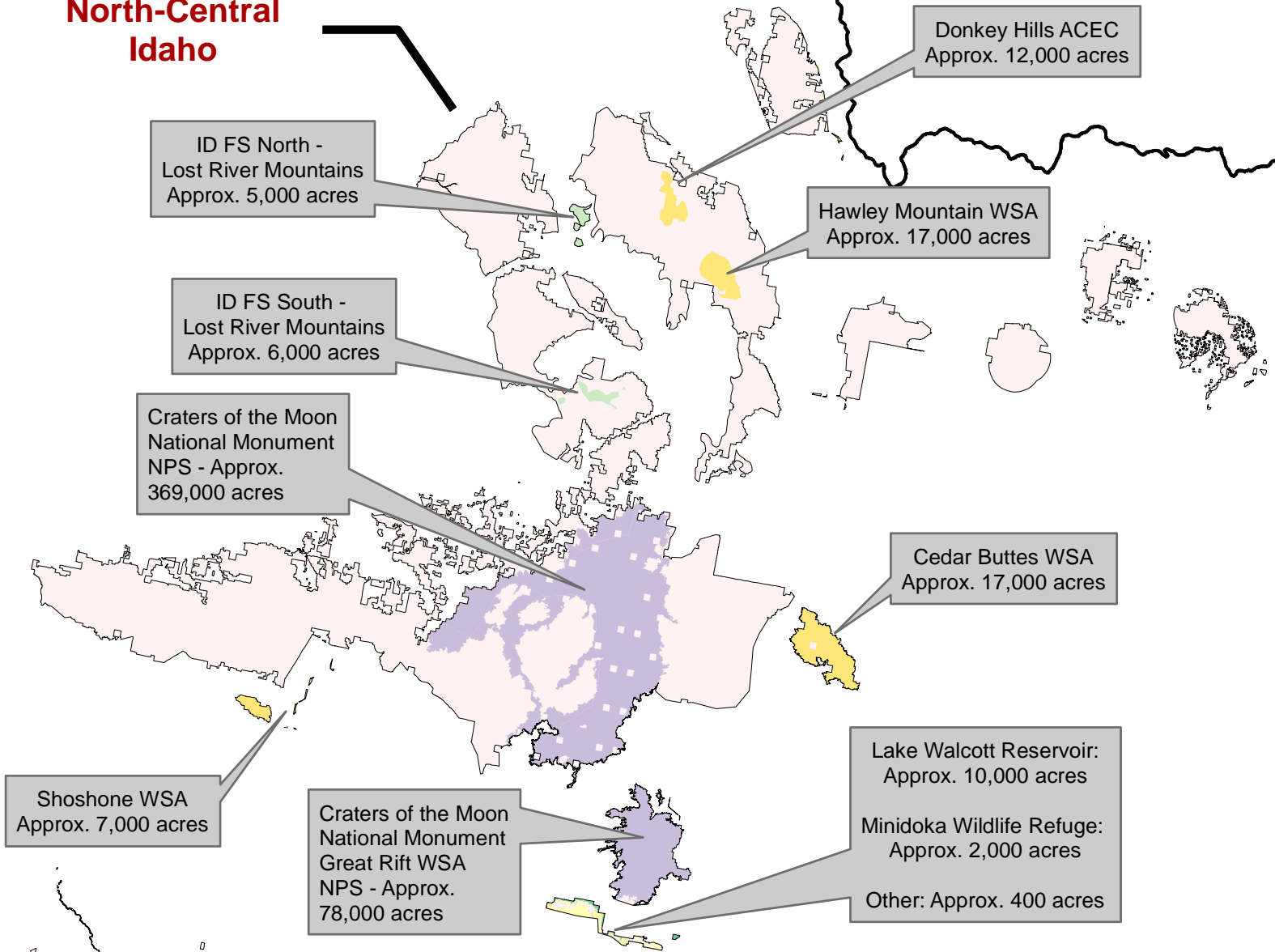
## - North Central Idaho

### Legend

-  FWS Areas of Significance / Sagebrush Focal Areas
- Surface Management Agency**
-  Non-Habitat, Bureau of Land Management
-  Non-Habitat, US Fish and Wildlife Service
-  Non-Habitat, Forest Service
-  Non-Habitat, National Park Service
-  Non-Habitat, Bureau of Reclamation
-  Non-Habitat, State
-  Non-Habitat, Private
-  Non-Habitat, Other/Undetermined
-  ADPP Habitat or Non-Habitat Outside of BLM Surface/ Subsurface Management

**Data Sources:**  
**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014. \*Only surface estate is used for classification in NV, OR and CA.  
**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.  
**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.  
**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).

## North-Central Idaho



IDM71\_0001372

***BLM-IDAHO***

**Greater Sage-Grouse Planning Issues for the BLM Planning Teams to Insert and Analyze in Administrative Draft Proposed Plan (ADPP)**

**January 30, 2015**

*The March 4, 2010 decision by the U.S. Fish and Wildlife Service that the greater sage-grouse warranted listing but was precluded [Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to list the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered] set in motion the most comprehensive land-use planning initiative in the BLM's history.*

*In 2011, the BLM began updating land-use plans across the West so as to ensure not only the long-term viability of the greater sage-grouse on public lands and the continued economic vitality of the West. This has been a complex and demanding process involving collaboration with an unprecedented number of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service and many others. The BLM's mandate of multiple use and sustained yield has required us to balance the full range of resource uses on public lands, including the conservation of crucial wildlife habitat. As we have worked through this process, public land managers throughout the BLM have made difficult resource management decisions.*

*These documents provide key guidance that will enable the BLM to finalize land use plans that will contribute to the conservation of the Greater Sage-Grouse and other sagebrush associated species across the West. The guidance outlines a suite of tools, such as disturbance limits in key habitats and mitigation approaches, which will help us to reach this goal. These mechanisms will work in concert to conserve sage-grouse habitat so that we can achieve our twin goals of thriving Greater Sage-Grouse populations and robust Western economies.*

***Issue:***

**Development in Highly Important Landscapes**

***Direction:***

As more specifically provided in this guidance, the ADPP will include Sagebrush Focal Areas (SFA), consisting of the BLM and FS-managed lands within the area depicted in the October 27, 2014 USFWS memo, *Greater Sage-Grouse: Additional Recommendation to Refine Land Use Allocations in Highly Important Landscapes*. In the Special Status Species Section of Chapter 2, include the following management action drop in language (for the Proposed Plan only):

*“Designate Sagebrush Focal Areas (SFA) as shown on Map X (x acres). SFAs will be managed as PHMA, with the following additional management:*

- 1) Recommended for withdrawal from the General Mining Act of 1872, subject to valid existing rights.*
- 2) Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.*

- 3) *Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."*

**The NOC will provide updated shapefiles that delineate the SFAs.**

Except as otherwise provided below, the ADPP will provide that all BLM- and FS-managed lands (including subsurface) within SFAs will be allocated and managed as PHMA and include the management actions above.

- *Do Not Include the following in SFA Management*
  - Hawley Mountain WSA (ID), Shoshone WSA (ID), Cedar Buttes WSA (ID), Lower Salmon Falls Creek (ID), Little Jack Wilderness (ID), Bruneau-Jarbidge Wilderness (ID) in non-habitat – The current management in these areas is generally protective of GRSG. As applicable, these will continue to be managed so as not to impair their suitability for preservation as wilderness, or under the terms of the Wilderness Act to preserve wilderness character.
    - To the extent that these areas were analyzed for contingent management as general or priority habitat, the ADPP will include contingent allocations and management direction that would apply in the event that Congress releases the areas from WSA status
  - Non-habitat areas outside Little Jack and Bruneau-Jarbidge Wilderness and Salmon Falls Creek ACEC which were previously shown within the SFA –These areas will not be managed as PHMA or SFA.
- Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)– these areas will be treated as PHMA, with the SFA management actions for this FS-land.
- Do Include Donkey Hills ACEC –In order to consolidate parcels for protection as SFAs, this area will be treated as PHMA and included for SFA management.
- *Do Not Include Other Agency Land in SFA Management* – while lands managed by other agencies will be shown on the SFA maps, BLM ADPP decisions will not be applied to them.
- *Do Not Include Private/State Lands in SFA Management* – while private lands may be within the SFA boundaries, ADPP decisions will not be applied to them, but may apply to Federal subsurface underlying such lands as provided below.
- *Subsurface Estate:*
  - Under private/state lands: subsurface estate in PHMA and GHMA should be treated as PHMA with SFA management actions.

- Under other Federal lands: subsurface state should be treated as PHMA with SFA management actions if it is not already withdrawn (such as in Refuges or Parks) and PHMA or GHMA management was analyzed in the DEIS.

Additional direction/drop in language for the ADPPs on SFAs will be forthcoming.

**Issue:**

**Direction:**

**Mitigation**

The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In all sage-grouse habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:**

**Direction:**

**Mapping**

Not Applicable

**Issue:**

**Direction:**

**Disturbance**

Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance (see Attachment II).

Planning units will include the following land use plan actions within their ADPPs that states:

- a. If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid*

*existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*

- b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

**Issue:**

**Direction:**

**Vegetation Objectives**

The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

**Issue:**

**Direction:**

**Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas,*

*including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*

- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

***Issue:***

***Direction:***

**Mineral Materials (Salable Minerals)**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

***Issue:***

***Direction:***

**High-voltage Transmission and Major Pipeline ROWs and Corridors**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that



are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”*

**Issue:** Coal Suitability  
**Direction:** Not Applicable in Idaho

**Issue:** Fluid Mineral Resources (Including Geothermal)  
**Direction:** All ADPPs will include the following as a conservation objective:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h).”*

*“Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.”*

**Issue:** No Surface Occupancy (NSO) Exception Language  
**Direction:** Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new fluid mineral

leases at the time of leasing only and may not be applied to existing fluid mineral leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*“No waivers or modifications to a fluid mineral lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action’s impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.”*

**Issue:**

**Direction:**

**Adaptive Management**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

***Issue:***

***Direction:***

**Application of Lek Buffers**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment IV) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review ([Open File Report 2014-1239](#)) in accordance with Appendix X.”*

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<i>Idaho/SW MT*</i>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion <i>Imp – Avoid</i>
<b>Wind – General</b>	Open <i>Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open

## Attachment I

# GREATER SAGE-GROUSE RMPA/FEIS TEMPLATE LANGUAGE FOR ADDRESSING MITIGATION

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

## Chapter 1 - Introduction

[Nothing new to add to EIS]

## Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

## Mitigation

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.

avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and

compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.



The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.

- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- **Compensatory Mitigation Options**
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- **Compensatory Mitigation Siting**
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- **Compensatory Mitigation Project Types and Costs**
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- **Compensatory Mitigation Compliance and Monitoring**
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

**Durability (protective and ecological):** the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Disturbance Caps Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use of locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER analysis in the land use plans (Chapter 2, Affected Environment) and the use of the “west-wide” sagebrush availability and habitat degradation data/estimates for the Priority Habitat Management Areas in each population for monitoring and management purposes as the LUPs are being implemented.
- VII. Provide guidance on what is considered in the disturbance calculations versus what is considered for the disturbance cap.

#### **Guidance**

- I. Planning units will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*
  - b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain*

*the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

- II. Use of west-wide habitat degradation data as well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use the west-wide data at a minimum and/or locally collected disturbance data as available (e.g., DDCT) for the anthropogenic disturbance types listed in Table 1.
  
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 7 additional features that are considered threats to sage-grouse (Table 2). Using 1 meter resolution NAIP imagery is recommended. Use local data if available.
  
- IV. Fire-burned and habitat treatment areas will not be included in the project scale degradation disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
  
- V. Planning units are directed to use a density cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is on average less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than an average of 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area (*subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.*).
  - Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments)

- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the Affected Environment section of the proposed plans/ FEISs. West-wide sagebrush availability and habitat degradation data layers will be used for the Priority Habitat Management Areas in each population for monitoring (see the GRSG Monitoring Framework in the Monitoring Appendix of the EIS) and management purposes as the LUPs are being implemented. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.
- VII. Planning units are directed to use the three measures (sagebrush availability, habitat degradation, density of energy and mining) in conjunction with other information during the NEPA process to most effectively site project locations, such as by clustering disturbances and/or locating facilities in already disturbed areas. Although locatable mine sites are included in the degradation calculation, mining activities under the 1872 mining law may not be subject to the 3% disturbance cap. Details about locatable mining activities should be fully disclosed and analyzed in the NEPA process to assess impacts to sage-grouse and their habitat as well as to BLM goals and objectives, and other BLM programs and activities.

### **Additional Information/Formulas**

A collaborative effort in Idaho developed a disturbance calculation method that includes the 3% disturbance cap plus a modifier that includes effective habitat and is described in Appendix G of their ADPP. The formulas below are excerpted from that Appendix.

Disturbance Calculations for the BSU:

$$\text{is ur an Percen ag} \\ = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^1}{\text{Acres within the BSU} * \left( \frac{\text{Acre of ive Habitat within h}}{\text{Acre within h}} + 0.3 \right)} \right) \times 100$$

Disturbance Calculations for Project Analysis Areas (PAAs):

$$\text{is ur an Percen ag} \\ = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^{1,2}}{\text{Acres within the PAA} * \left( \frac{\text{Acre of } \text{ive Habitat within h PA}}{\text{Acre within h PA}} + 0.3 \right)} \right) \times 100$$

<sup>1</sup> see Table 3. <sup>2</sup> see Table 2.

Project analysis area (PAA) method for permitting surface disturbance activities:

1. Determine potentially affected occupied leks by placing a four-mile buffer around the project boundary as defined by the proposed area of physical disturbance related to the project. All occupied leks within this buffer will be considered affected by the proposed project.
2. Next place a four mile boundary around each of the occupied leks identified in item 1, above.
3. The polygon formed by the merging and dissolving of polygons from step 1 and 2 creates the Project Analysis Area (PAA) for surface disturbance activities.
4. Map existing disturbances within the analysis area or use locally available spatial data. Use of digitized NAIP imagery is recommended.
5. Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
6. Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
7. Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1 facility per 640 acres, averaged across project analysis area, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1 facility per 640 acres, averaged across the project analysis area, either defer the proposed project or co-locate it into existing disturbed area.
8. If a project that would exceed the degradation cap or density cap cannot be deferred due to valid existing rights or other existing laws and regulations, fully disclose the local and regional impacts of the proposed action in the associated NEPA.



Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

**Table 2.** The seven additional features to include in the disturbance calculation at the project scale

<ol style="list-style-type: none"> <li>1. Coalbed Methane Ponds</li> <li>2. Meteorological Towers</li> <li>3. Nuclear Energy Facilities</li> <li>4. Airport Facilities and Infrastructure</li> <li>5. Military Range Facilities &amp; Infrastructure</li> <li>6. Hydroelectric Plants</li> <li>7. Recreation Areas Facilities and Infrastructure</li> </ol>
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**Table 3.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

## **Background**

In the USFWS's 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse's habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 7 types of features that are threats to sage-grouse will be used in the project analysis areas.

		Scales		
		Broad/Mid (Populations)	Intermediate (BSU)	Local/Project (Seas. Hab.)
Habitat Degradation	Unit:	WAFWA Populations	Biologically Significant Unit	Project/Local Habitat Area <sup>6</sup>
	Area of Interest:	PHMAs	PHMAs	PHMAs
	Data:	Westwide degradation data	Westwide <sup>2</sup> , State, Local	State, Local
	Formula (Measure 2a):	<u>12 Degradation Threats</u> PHMAs in Populations	<u>12 Degradation Threats</u> PHMAs in BSUs	<u>12 Degradation Threats + 7<sup>7</sup></u> PHMAs in Proj. <sup>3</sup>
	Management:	Internal BLM & FS estimates	3% Cap, Adapt Mgmt <sup>4</sup>	3% Disturbance Cap
	All Lands:	Yes	Yes	Yes
	Fire Included:	No	No	No
	Who:	BLM NOC	BLM NOC <sup>5</sup> or State Offices	State Offices or Field Offices
Sagebrush Availability	Unit:	WAFWA Populations	Biologically Significant Unit	n/a
	Area of Interest:	PHMAs	PHMAs	
	Data:	LANDFIRE Updated EVT	Updated EVT or State data	
	Formula (Measure 1a):	<u>Existing Updated Sagebrush</u> PHMAs in Populations	<u>Existing Updated Sagebrush</u> PHMAs in BSUs	
	Management:	Internal BLM & FS estimates	Adaptive Management <sup>4</sup>	
	All Lands:	Yes	Yes	
	Fire Included:	Yes	Yes	
	Who:	BLM NOC	BLM NOC <sup>5</sup> or State Offices	
Energy and Mining	Unit:	WAFWA Populations	n/a	Project Area & Seasonal Hab.
	Area of Interest:	PHMAs		PHMAs
	Data:	Westwide well & mine data		Westwide <sup>2</sup> , State data
	Formula (Measure 3):	<u>Well Pads and Mines</u> <sup>1</sup> Square Mile		<u>Well Pads and Mines</u> <sup>1</sup> Square Mile
	Management:	Internal BLM & FS estimates		Project Authorization
	All Lands:	Yes		Yes
	Fire Included:	No		No
	Who:	BLM NOC		BLM NOC or SOs or FOs
<b>ACRONYMS</b>				
PHMA = Priority Habitat Management Area      BSU = Biologically Significant Unit				
EVT = Existing Vegetation Type                      BpS = Areas of Biotic Potential				
<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.				
<sup>2</sup> Westwide data will be used only if state or local data are not available.				
<sup>3</sup> This footnote was removed from the table. January 2015.				
<sup>4</sup> This may be one of several variables used to inform Adaptive Management. The BSU is the scale at which Adaptive Management will be applied.				
<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data/analysis should be used for Adaptive Management				
<sup>6</sup> The project analysis area will be based on a 4-mile radius polygon around the project area combined with a 4-mile buffer around any leas within the project boundary in PHMA (Idaho methodology).				
<sup>7</sup> See Table 2				

## Attachment III

### **Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

#### **Guidance**

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment IV

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in



grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

### **Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSG RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSG habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSG habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

Attachment V

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*

Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

  - linear features (roads) within 3.1 miles of leks
  - infrastructure related to energy development within 3.1 miles of leks.
  - tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
  - low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
  - surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
  - noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis.

  - Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
  - If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
    - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater

level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).

- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.

**From:** Jeffery Foss  
**Sent:** Thursday, June 19, 2014 1:52 PM  
**To:** Edwin Roberson; Kathryn Stangl  
**Subject:** Fwd: Idaho Sage grouse Plan--Snapshot (NPT)  
**Attachments:** Idaho Plan SNAPSHOT June 4 2014.docx

FYI

Sent from my iPhone

Begin forwarded message:

**From:** "Foss, Jeffery" <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Date:** June 4, 2014 at 3:45:41 PM MDT  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Cc:** jeff foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Subject:** Idaho Sage grouse Plan--Snapshot (NPT)

As requested

--

**Jeff Foss**  
Deputy State Director- Resources, Idaho BLM  
1387 S. Vinnell Way, Boise, ID 83709  
208-373-3800  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

The Idaho plan delineates three management zones – **Core, Important and General**. These management zones represent a continuum of management restrictions/protections for greater sage-grouse (GRSG) and are foundational to the adaptive management strategy contained within the ADPP.

**Core Management Zones**: These represent the most restrictive management direction within these areas and are consistent with the national policy team direction or goes beyond that direction in its protection of GRSG.

- **73% of the breeding males**
- 65% of the occupied leks
- 66% of the USFWS priority areas for conservation (PACs).

**Important Management Zones**

- **22% of the breeding males**
- 20% of the occupied leks (+/-)
- 33% of the PAC areas
- plus over 1 million additional acres supporting 4% of the breeding males outside of PAC areas.

**Core and Important Management Zones support approximately 95% of the population in Idaho.**

General Management Zones contain less than 5% of the population and represent the least intact and least productive habitats for GRSG.

**Any proposed development within Important Management Zones would be required to meet the following Anthropogenic Disturbance Development Criteria:**

- a. The project does not result in a net loss of GRSG habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant Conservation Area; and
- b. The project cannot reasonably be achieved, technically or economically, outside of this management area; and
- c. The project is co-located within the footprint for existing infrastructure, to the extent practicable. In the event co-location is not practicable, the siting should best reduce cumulative impacts and/or impacts on other high value natural, cultural, or societal resources; and
- d. The project design mitigates unavoidable impacts through appropriate compensatory mitigation;
- e. The project complies with the applicable RDFs as described; and
- f. The project would not exceed the disturbance threshold

**From:** Jeffery Foss  
**Sent:** Wednesday, September 10, 2014 6:17 AM  
**To:** Steven Ellis; Edwin Roberson  
**Cc:** Timothy Murphy; Kurt R Wiedenmann; Sylvia Graves; Peter Ditton; Terrian Wells  
**Subject:** Fwd: Idaho's 3 Mgmt Zones  
**Attachments:** The Strength of 3 V3 TMJF.docx

Steve and Ed

Attached is the requested 1 pager on Idaho's 3 Mgmt Zones for sage-grouse. Let us know if you have questions.

Sylvia, please forward to Sarah Greenberger (SOL), I don't have her email address in my iPhone

Thanks  
Jeff

Sent from my iPhone

Begin forwarded message:

**From:** Jeff Foss <[jefffoss@yahoo.com](mailto:jefffoss@yahoo.com)>  
**Date:** September 10, 2014 at 7:12:42 AM MDT  
**To:** Foss L <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Subject:** Fw: Idaho's 3 Mgmt Zones  
**Reply-To:** Jeff Foss <[jefffoss@yahoo.com](mailto:jefffoss@yahoo.com)>

----- Forwarded Message -----

**From:** Jeff Foss <[jefffoss@yahoo.com](mailto:jefffoss@yahoo.com)>  
**To:** Foss L <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Sent:** Wednesday, September 10, 2014 7:07 AM  
**Subject:** Idaho's 3 Mgmt Zones





## National Greater Sage-Grouse Idaho & Southwestern Montana Sub Region The Strength of 3-Management Zones



*The Idaho Plan has 3-Management Zones: Core, Important and General. Core and Important Management Zones are collectively referred to as Priority Management Zones which encompass 94% of the leks and 97% of the breeding males in Idaho. Delineation of these zones will retain and protect sagebrush cover and GRSG habitat (consistent with Wisdom et al. 2011, Aldridge et al. 2008, and Knick et al. 2000) through appropriate prioritization and protective measures within the most critical habitats (Core) and across broader intact habitat areas (Important).*

**Core Management Zones (CMZ)** are delineated to protect large unfragmented, contiguous landscapes from anthropogenic disturbance and to focus wildfire reduction (suppression activities and fuels treatments) associated with the two key meta-populations within the subregion (Garton et al. 2011). These areas represent strongholds for populations in Idaho and encompass all the seasonal habitats necessary to support approximately 77% of the breeding males in Idaho, which represents and exceeds the State of Idaho's population objective for the species.

**Important Management Zones (IMZ)** are delineated to encompass high-quality habitat adjacent to and connecting areas of CMZ providing for migration corridors and connectivity among breeding areas, which also support populations and habitat independent of the CMZ (20% of the breeding males).

3-Management Zones are a foundational component of the Idaho Plan which directly supports and is critical to the adaptive management strategy and ongoing support of State partners who monitor populations to support evaluation of adaptive population triggers necessary to respond to the threats present in the subregion.

The Priority Management Zones protect the two key meta-populations in the subregion (Garton et al. 2011) through retention and protection of sagebrush cover and sage-grouse habitat that exceeds areas delineated as Priority Areas for Conservation (PACs) with appropriate habitat prioritization, responsive adaptive management and adequate protective measures to meet and exceed the objectives described in the COT Report; effectively protecting nearly 95% of Idaho's breeding male population.

3-Management Zones responsively address the primary threats of wildfire and invasive species present in the subregion.

**Wildfire:** Each year, on average, 350K acres burn on Idaho BLM lands. Suppression resources catch and suppress 98% of all fires and prevent them from developing into large conflagrations capable of destroying vast swaths of sagebrush vegetation. Delineation of 3-Management Zones provides a graduated prioritization strategy during times of multiple fire ignitions when suppression resources are fully allocated and cannot attend to all starts – this is when the 2% of fires not caught quickly have the opportunity to spread unrestrained. 3-Management Zones provide land managers a prioritization framework to focus suppression resources on fires most threatening to GRSG and their most critical habitats (Core Management Zones).

3-Management Zones provide the foundation for a responsive adaptive management strategy.

**Wildfire:** In the event habitat or population losses exceed a specified threshold, other acres of intact and functioning habitat will be re-prioritized for suppression at the trade-off of those acres recently burned and no longer providing habitat values, at least in the short-term.

**Development:** In the event habitat or population losses exceed a specified threshold, other acres of intact and functioning habitat will be further restricted from new development.

3-Management Zones appropriately address the significantly lower threat of development present in the subregion.

**Development:** Existing development, when added to projected development, is low, averaging around 0.5% in the subregion. In addition there is minimal mineral potential, natural topographic fragmentation, and relative remoteness of the landscapes. The restrictive conservation measures including the disturbance cap coupled with the stringent development criteria associated with proposals effectively pushes development to areas outside Priority Management Zones.

3-Management Zones have been developed and supported through a broad coalition of stakeholders: BLM, Forest Service, USFWS, the State of Idaho and through extension of the State's Task Force – Idaho Power, Idaho Conservation League, Idaho Cattlemen's Association, The Nature Conservancy and county officials. All of these stakeholders are currently fully committed to a successful outcome for GRSG. This coalition is actively supporting development of the State's management approach (including Rural Fire Protection Associations) for State and private lands within Idaho, consistent with the federal lands approach. Elimination of the 3-Management Zones would likely erode commitment of the coalition, alienate the State of Idaho, and effectively eliminate any chance of extending additional protections to State and private lands through State and County leadership and authority, resulting in a decidedly unfavorable outcome for GRSG in Idaho.

**From:** Lauren Mermejo  
**Sent:** Thursday, December 18, 2014 8:21 AM  
**To:** Stephanie Carman  
**Subject:** Fwd: Idaho SW Montana differences

FYI

Sent from my iPhone  
Lauren

Begin forwarded message:

**From:** "Beck, Jonathan" <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>  
**Date:** December 18, 2014 at 7:58:06 AM PST  
**To:** "Munson, Johanna" <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, Lauren Mermejo <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)>  
**Subject:** Re: Idaho SW Montana differences

Lauren, Johanna had me review the current vs new version. Everything in the new version for Idaho is correct. I wanted to point out that we will be applying buffers rdfs etc to anything open in general. I have a meeting now and will review the Montana decisions in an hour. Jon

On Thu, Dec 18, 2014 at 8:38 AM, Munson, Johanna <[jmunson@blm.gov](mailto:jmunson@blm.gov)> wrote:

----- Forwarded message -----  
From: **Lauren Mermejo** <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)>  
Date: Wed, Dec 17, 2014 at 4:22 PM  
Subject: Idaho SW Montana differences  
To: Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>

--  
Johanna Munson  
Acting Branch Chief, Resources and Science  
Idaho State Office  
Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

Office: 208-373-3813

Fax: 208-373-3805  
Email: [jmunson@blm.gov](mailto:jmunson@blm.gov)

--  
Jonathan Beck  
Bureau of Land Management  
208-384-3305 Boise District  
208-373-4070 Idaho State Office

**From:** Carman, Stephanie  
**Sent:** Wednesday, December 17, 2014 3:05 PM  
**To:** Lauren Mermejo; Jonathan Beck  
**Cc:** Matthew Magaletti; Michael Hildner  
**Subject:** Fwd: Idaho.SW Montana Differences  
**Attachments:** Idaho.SW Montana differences.docx

Thanks Lauren - I need to run this by Idaho to make sure its correct. Jonathan, can you please confirm ASAP?

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

----- Forwarded message -----

**From:** Lauren Mermejo <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)>  
**Date:** Wed, Dec 17, 2014 at 6:02 PM  
**Subject:** Idaho.SW Montana Differences  
**To:** Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>  
**Cc:** Michael Hildner <[mhildner@blm.gov](mailto:mhildner@blm.gov)>, Matthew Magaletti <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)>

Stephanie –

I created this for clarity. The first table shows the allocation decisions, what is currently in the issues paper, and how it should be corrected for Idaho. The second table is for the SW Montana piece....I just took the allocation for Montana that are currently in their column.

I have NOT run this through Jonathan Beck or John Carlson....but if my understanding of all of this is correct, this is the way it needs to be.

Hope this helps.

Lauren

Allocation Resource	Idaho – Current Version	Idaho – New Version
<b>Solar - Priority</b>	Exclusion <i>Imp – Avoid.</i>	Exclusion <i>Imp – Avoid. Screening process</i>
<b>Solar – General</b>	Open <i>Imp – Open</i> <i>Screening process</i>	Open
<b>Wind – Priority</b>	Exclusion <i>Imp – Avoid.</i>	Exclusion <i>Imp – Avoid. Screening process</i>
<b>Wind – General</b>	Open <i>Imp – Open</i> <i>Screening process</i>	Open
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid</i>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open <i>Screening process</i>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>	Avoidance <i>Imp – Avoid Screening process</i>
<b>Minor ROWs – General</b>	Open	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>	Closed <i>Imp – Open Screening process</i>
<b>Non-energy Leasables - General</b>	Open	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>	Closed <i>Imp – Open Screening process</i>
<b>Mineral Materials – General</b>	Open	Open

Allocation Resource	SW Montana
<b>Solar - Priority</b>	Exclusion
<b>Solar – General</b>	Avoidance
<b>Wind – Priority</b>	Exclusion
<b>Wind – General</b>	Avoidance
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Avoidance
<b>Minor ROWs – Priority</b>	Avoidance
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed
<b>Mineral Materials – General</b>	Open

**From:** Carman, Stephanie  
**Sent:** Tuesday, April 21, 2015 12:52 PM  
**To:** Jamie Connell  
**Subject:** Fwd: MT

Sorry, I intended to cc you on this.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

----- Forwarded message -----

**From:** Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)>  
**Date:** Tue, Apr 21, 2015 at 3:34 PM  
**Subject:** Re: MT  
**To:** "Greenberger, Sarah" <[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)>  
**Cc:** "Lueders, Amy" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Steven Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>, James Lyons <[james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov)>, "Michael J. Bean" <[Michael\\_Bean@ios.doi.gov](mailto:Michael_Bean@ios.doi.gov)>, Bret Birdsong <[bret.birdsong@sol.doi.gov](mailto:bret.birdsong@sol.doi.gov)>

Below is the proposed language. We have discussed with planners and Aaron and Sarah in the SOL office and recommend that this statement be included in the Adaptive Management portion of the plan, as well as be highlighted in the executive summary.

Every two years the BLM shall review the State of Montana's GRSG Habitat Conservation Program. If the BLM finds that the State of Montana is implementing a GRSG Habitat Conservation Program that is effectively conserving the GRSG, the BLM will review the these management goals, objectives, and actions to determine whether amendment of this plan is appropriate to achieve consistent management across all lands regardless of ownership.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Tue, Apr 21, 2015 at 12:23 PM, Greenberger, Sarah <[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)> wrote:

Hold. Does anyone have concerns if it read: If the BLM finds that the State of Montana is implementing a GRSG Habitat Conservation Program that is effectively conserving the GRSG, the BLM will review . . .

On Tue, Apr 21, 2015 at 12:21 PM, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Ok, will work on this afternoon and incorporate the info from Michael.

Stephanie Carman  
Mobile 202 380 7421

Sent from my iPhone

On Apr 21, 2015, at 12:10 PM, Greenberger, Sarah <[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)> wrote:

OK. I thought I understood from Ed that you already had some proposed to the language below which is what prompted my ask. I would say this:

(1) to the extent we can place this as close to the front in the plan, that is so long as it doesn't interfere with the plan operation of which you all are a better judge.

(2) I discussed with him that we might reference broader objectives and not as the measure, he was open to that. Would that overall objective be to maintain and/or increase GSG abundance and distribution by conserving, enhancing or restoring the sagebrush ecosystem.

On Tue, Apr 21, 2015 at 12:02 PM, Lueders, Amy <[alueders@blm.gov](mailto:alueders@blm.gov)>

i have forwarded the language to Stephanie and have pasted it below. The questions Ed and I have discussed are:

1. Is the proposed plan location the most appropriate spot for it in the plan (does it more cleanly fit in the adaptive management section or elsewhere)
2. Do we want to reference to WY as the measure of success or to our conservation objectives?

Proposed MT language  
Goal 1

Objective 5 - promote the effective and seamless protection of GRSG and its habitat by seeking to achieve consistent management across all lands regardless of ownership

Every two years the BLM shall review the State of Montana's GRSG Habitat Conservation Program. If the BLM finds that the State of Montana is implementing a GRSG Habitat Conservation Program that is comparable in its scope, operation, and effect to the State of Wyoming's Core Area Strategy, the BLM will review its management goals, objectives, and actions to determine whether amendment of this plan is appropriate to to achieve consistent management across all lands regardless of ownership.

On Tue, Apr 21, 2015 at 8:55 AM, Greenberger, Sarah  
<[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)> wrote:

Thanks, I know Ed reported yesterday that there were some changes you wanted to the language Tim had proposed.

On Tue, Apr 21, 2015 at 11:51 AM, Stephanie Carman  
wrote:

We are tracking it down and will get it back to you this afternoon.

Stephanie Carman  
Mobile 202 380 7421

Sent from my iPhone

On Apr 21, 2015, at 11:25 AM, Greenberger, Sarah  
<[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)> wrote:

Just got off the phone with Tim Baker. He thinks their session will wrap this week. It's critical that we share the 2 year review language with him and get to final ASAP so its in there when this gets shared. Can you all share what we have now so this group has comfort? Thanks.



E-mail regarding no surface occupancy exception language.

**From:** Edwin Roberson  
**Sent:** Wednesday, January 14, 2015 3:31 PM  
**To:** Stephanie Carman  
**Subject:** Fwd: NSO exception language - double checking

FYI

Begin forwarded message:

**From:** Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** January 14, 2015 at 6:30:19 PM EST  
**To:** Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)>, James Lyons <[james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov)>  
**Subject:** Re: NSO exception language - double checking

Noreen (& Jim),

We are square on those two issues. There is another Montana issue I wanted you and Jim aware of although I don't want to put more stuff on your plate. I was on a call with Jamie this afternoon and she reminded me the Tim Baker was hoping to have a chat with FWS and Jim about the Montana Executive Order. Tim asked me and Jim when he was back here in December what they could do to improve their plan. I said they need to talk to you and your ES state director. If you all haven't chatted yet he may want to next week. I hope the Governor will continue to advance and strengthen his plan. Enjoy your evening.

On Jan 14, 2015, at 6:14 PM, Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)> Wrote:

Thanks much. I thought we were ok in MT (I should not have confused the issue by including those notes) and am glad to know the word federal is taken care of.

Seeing your doc before the TF call would be very helpful – thanks for the offer.

**From:** Roberson, Edwin [mailto:[eroberso@blm.gov](mailto:eroberso@blm.gov)]  
**Sent:** Wednesday, January 14, 2015 10:20 AM  
**To:** Noreen Walsh  
**Cc:** pat deibert; Matt Kales; Stephanie Carman; Chris -FS Iverson  
**Subject:** Re: NSO exception language - double checking

Noreen,

I copied Chris and Steph on the response for continuity. The copy that I am working from for the Friday conference call with the Task Force has the word "Federal". Also, there is no Montana exception shown to the NSO without exception in the stronghold. So, I think we are on the same page. We will be

sharing the final version with our SDs at 10:30 eastern. I will send to you all then so you can share with your folks before the Task Force call. If you and Chris want to talk before then, I have time tomorrow. Might be good. ed

On Wed, Jan 14, 2015 at 11:52 AM, Noreen Walsh

<[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)> wrote:

Ed, could I trouble you to double check an issue that I think we have resolved regarding exception language for NSO?

My personal notes follow and the portion in red is what I think may have been lost in your final docs:

*Remaining discussion has been around the exception language for exception to NSO. Direction set at 11/25/14 meeting, new language provided in 12/19/14 document. Two remaining issues needed final decision:*

- 1. The following edit needs to occur to ensure final language is consistent with our agreement from 11/25/14: "... or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid **FEDERAL** oil and gas lease existing as of the date of this RMP..."*
- 2. In discussions on 12/19/14, BLM indicated a change in that they now wanted to include NSO with exceptions in the MT stronghold area. FWS Director has indicated this is not recommended by FWS. **Final BLM decision as stated on 12/22/14: Agreed to reinsert the word federal and to keep NSO without exception in MT stronghold.***

I'm not sure, but if you could double check that the word federal was reinserted, I would appreciate it.

Thanks,  
Noreen

Noreen Walsh  
Regional Director  
Mountain-Prairie Region  
U. S. Fish and Wildlife Service  
303 236 7920



**From:** Roberson, Edwin  
**Sent:** Wednesday, December 17, 2014 2:58 PM  
**To:** James Lyons  
**Cc:** Stephanie Carman  
**Subject:** Montana EO  
**Attachments:** EO\_10\_2014\_SageGrouseMontana.pdf

Jim, Here is the Montana EO. On page 6 in paragraphs 26 and 27, the language covers the intent related to projects. (eg, "deemed sufficient to demonstrate the project will not cause declines in sage grouse populations.")

STATE OF MONTANA  
OFFICE OF THE GOVERNOR  
EXECUTIVE ORDER No. 10-2014

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**EXECUTIVE ORDER CREATING THE MONTANA SAGE GROUSE OVERSIGHT  
TEAM AND THE MONTANA SAGE GROUSE HABITAT CONSERVATION  
PROGRAM**

---

**WHEREAS**, the Greater Sage grouse (*Centrocercus urophasianus*) is an iconic species that inhabits much of the sagebrush-grassland habitats in Montana;

**WHEREAS**, thanks to concerted efforts of wildlife managers, private landowners, and others, the State of Montana currently enjoys viable and widespread populations of the species, the second largest abundance of Greater Sage grouse among western states;

**WHEREAS**, the United States Fish and Wildlife Service (USFWS) has determined that the Greater Sage grouse species is warranted for listing as a threatened or endangered species under the Endangered Species Act of 1973(ESA), but is precluded by other higher priority species;

**WHEREAS**, the United States District Court for the District of Idaho ruled on February 2, 2012 that the USFWS must re-evaluate the status of the Greater Sage grouse by September 30, 2015;

**WHEREAS**, the United States Secretary of the Interior has invited Montana and other western states to develop state-specific programs to conserve the Greater Sage grouse species and preclude the need to list under the ESA;

**WHEREAS**, the development of a state strategy in Montana will be critical in demonstrating to the USFWS that the species does not warrant federal protection under the ESA;

**WHEREAS**, the development of a state-specific strategy will enable the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) to incorporate relevant elements from the strategy into their land use plans and environmental analyses;

**WHEREAS**, because of the sound management practices and ongoing efforts of private landowners, approximately half of Greater Sage grouse habitat in Montana involves private property, and maintaining the species will require effective conservation strategies across property ownerships;

**WHEREAS**, the State of Montana has management authority over Greater Sage grouse populations in Montana;

**WHEREAS**, the State of Montana, in collaboration with stakeholders, developed and adopted a state Greater Sage grouse plan in 2005, pertaining to sage grouse population responses to large-scale changes in habitat;

**WHEREAS**, the listing of the Greater Sage grouse could have a significant adverse effect on the economy of the State of Montana;

**WHEREAS**, new science, information and data continue to emerge regarding the habitats and behaviors of the Greater Sage grouse;

**WHEREAS**, in February 2013 Governor Bullock created the Greater Sage grouse Habitat Conservation Advisory Council (Council), to gather information, and bring stakeholders and experts together in a public process to recommend conservation measures to address the primary and secondary threats to the Greater Sage grouse (hereafter sage grouse) in Montana, and a state-wide strategy to preclude the need to list the sage grouse under the ESA, and to bring those recommendations to the Governor no later than January 31, 2014;

**WHEREAS**, in preparing its recommendations, the Council reviewed the 2005 Montana Sage Grouse Conservation Plan, BLM Interim Memorandum Guidance, National Technical Team Report, USFWS Conservation Objectives Team Report (COT), relevant scientific information, and other existing strategies and information, held ten multi-day public meetings in Helena, accepted broad and diverse public comment on draft recommendations, and conducted seven public hearings around the state;

**WHEREAS**, the Council formally presented its recommendations and advice to the Governor on January 29, 2014;

### **Creation of the Montana Sage Grouse Oversight Team and the Montana Sage Grouse Habitat Conservation Program**

1. There is created a Montana Sage Grouse Oversight Team (MSGOT), attached to the Governor's Office. The initial composition of MSGOT shall include the Directors of the Departments of Fish, Wildlife and Parks, Environmental Quality, Natural Resources and Conservation, and Transportation, the Executive Director of the Montana Board of Oil and Gas Conservation, a representative of the Rangeland Resources Committee, and a member of the Governor's Office.
2. The function of MSGOT will be to oversee the administration of the Montana Sage Grouse Habitat Conservation Program (Program). This will include, among other tasks: supervision of the Program Manager, staying abreast of emerging science and developing appropriate guidance, reviewing and troubleshooting the consultation process, providing input to funding requests for research and land management projects, and recommending to the Governor further improvements to the Program.
3. The role of the Program and MSGOT is to: provide guidance to, exchange information with, seek input from, and consult with state agencies and other instruments of state government

during permitting and other authorizations, or during consultation, or technical, financial, or other assistance for non-regulated activities; administration of the Conservation Strategy (including application of the Density Disturbance Calculation Model); serve as the principal point of contact for the interested public and stakeholders regarding the Conservation Strategy; and oversee administration of the Sage Grouse Stewardship and Conservation Fund, designed to promote voluntary and cooperative habitat conservation and beneficial land management practices (if approved by the Legislature). Nothing in this Order in any way creates, adds to, or expands the regulatory authority of any state agency.

4. During the initial startup of the Program, MSGOT shall focus its efforts on the following tasks: setting up the Program, including hiring staff and creating protocols for operation; working with state agency and Program staff to educate state agencies and other instruments of state government regarding the Program and the provisions of this Order (Conservation Strategy); address such other issues as are delineated in this Order and attachments and as may arise during startup. The Department of Fish, Wildlife and Parks shall provide necessary staff assistance for the MSGOT (until such time as key Program staff are hired).
5. All meetings of the MSGOT shall be open to the public, with public notice and participation, consistent with Montana law.
6. During the initial startup of the Program, the Department of Fish, Wildlife and Parks shall, as practical, use this Conservation Strategy and professional judgment in applying this Strategy when commenting on state activities that have the potential to impact sage grouse.
7. MSGOT shall report to the Governor further improvements in the Program that are necessary, and it is anticipated that a subsequent Executive Order will fully implement all aspects of the Program and transition to mandatory review and consultation (“effective date”).
8. The staffing for the Program is as follows: Program Manager; GIS Manager; GIS Technician, two Biologists, and support for seasonal work. The Departments of Fish, Wildlife and Parks, Environmental Quality, and Natural Resources and Conservation shall provide legal assistance to the Program as necessary. During the initial Program startup, each agency shall allocate such additional staff resources as are necessary. After the Program and GIS Managers are hired, MSGOT may choose to contract with other state agencies for services in lieu of hiring staff.
9. Management by state agencies shall give priority to the maintenance and enhancement of sage grouse habitats in Core Population and Connectivity Areas identified in Attachment A. Absent substantial and compelling information, the Core Population Areas (Core Areas) in Attachment A should not be altered for at least 5 years.
10. MSGOT shall develop incentives to accelerate or enhance required reclamation in habitats in and adjacent to Core Areas, including but not limited to stipulation waivers, funding for enhanced reclamation, and other strategies. Incentives shall result in net benefit to, and not cause declines in, sage grouse populations.

11. Where possible, MSGOT shall develop incentives to encourage new land uses and activities in General Habitat to occur in a manner that minimizes impacts to sage grouse populations and habitats.
12. Where appropriate, and to minimize or streamline the process associated with implementation of this Conservation Strategy, MSGOT should consider recommending for adoption best management practices that can be self-implemented in place of MSGOT or Program review.
13. MSGOT shall develop a comprehensive program that provides for appropriate mitigation, including compensatory mitigations (financial, off-set, or off-site). All new land uses or activities shall follow the sequencing provisions required herein (avoid, minimize, reclaim). Mitigation shall be required for all activities that are subject to agency review, approval, or authorization, even if the impacts are indirect or temporary. A variety of mitigation tools may be used, including conservation banks, habitat exchanges, and approved conservation plans.
14. Predators can be a threat to localized sage grouse populations and an impediment to efforts to protect sage grouse. Predators have always preyed upon sage grouse, and the best way to minimize this impact is to provide good quality habitat in sufficient quantity. In addition to generally implementing this Conservation Strategy, Attachment B contains specific recommended practices for minimizing the effects of predators on sage grouse.
15. While it is unlikely that predator control is a long-term solution to a general range-wide decline in populations of sage grouse, it may provide beneficial short-term relief to localized decreases in sage grouse populations. For example, the U.S. Fish and Wildlife Service (USFWS) recently granted a permit to the State of Idaho for the lethal removal of ravens in three specific locations to evaluate the impacts of predation on sage grouse. If such localized circumstances are found to exist, MSGOT should involve diverse stakeholders to explore public-private opportunities for field research to examine the predator-prey relationship, the effects of habitat disturbance, and the feasibility and efficacy of a predator management plan.

### **General Principles**

16. Valid rights are legal rights or interests that are associated with a land or mineral estate and cannot be divested from that estate until that interest expires, is relinquished, or acquired. Existing rights shall be recognized and respected, including those associated with state trust lands.
17. Approximately 64% of sage grouse habitat in Montana is in private ownership. Montana's private landowners care about the future of sage grouse and manage their lands productively in this regard. State agencies are directed to work collaboratively with private landowners (and local governments) to maintain and enhance sage grouse habitats and populations, and to the greatest extent possible shall use non-regulatory measures that reflect unique localized conditions, including soils, vegetation, development type, predation, climate and other local realities. Voluntary incentives designed to conserve sagebrush habitat and grazing lands



within identified sage grouse Core Areas and General Habitat areas on private and state lands will be created and encouraged.

18. The success of this Conservation Strategy depends on state and federal agencies, including the U.S. Fish and Wildlife Service, Bureau of Land Management, U.S. Forest Service, Natural Resource Conservation Service, and other federal agencies, working collaboratively to maintain and enhance sage grouse habitats and populations.
19. Funding, assurances (including efforts to develop Candidate Conservation Agreements and Candidate Conservation Agreements with Assurances, etc.), habitat enhancement, reclamation efforts, mapping and other associated proactive efforts to assure viability of sage grouse in Montana shall be focused and prioritized to occur in Core Areas. Formal voluntary agreements between private and federal regulatory entities to address the conservation needs of sage grouse shall be entitled to deference.
20. Fire suppression efforts in Core Areas shall be prioritized, recognizing that other local, regional, and national suppression priorities may take precedent. Coordination among all fire-fighting units is required to implement fire prevention, suppression, and rehabilitation management as detailed in Attachment C. The Department of Natural Resources and Conservation shall follow these recommendations as resources and circumstances allow, and will request cooperation and collaboration from federal agencies on rehabilitation projects after wildfire. Public and firefighter safety remains the number one priority for all fire management activities.
21. MSGOT, Program staff, and all state and federal agencies shall strive to maintain consistency with this Conservation Strategy, recognizing that adjustments may be necessary based upon local conditions and limitations.
22. MSGOT shall regularly reevaluate the effectiveness of this Conservation Strategy, at a minimum annually, as new science, information and data emerge regarding the habitats and behaviors of sage grouse, and shall recommend such changes as are appropriate.

#### **Application of the Conservation Strategy to Land Uses and Activities**

23. Existing land uses and activities shall be recognized and respected by state agencies, and those existing prior to the effective date of the Program will not be managed under the stipulations of this Conservation Strategy. Examples of existing activities include oil and gas, mining, agriculture, processing facilities, power lines, housing, operations and maintenance activities of existing energy systems within a defined project boundary, (i.e., ROW), and other uses that were in place prior to the effective date of the Program. Provided these uses and activities are within a defined project boundary (such as a recognized federal oil and gas unit, drilling and spacing unit, mine plan, subdivision plat, etc.) they may continue within the existing boundary, even if they exceed the stipulations of this Conservation Strategy.
24. New land uses or activities in Core Areas shall be avoided when possible. New developments or land uses permitted or authorized within Core Areas shall minimize impacts

on suitable habitat, and reclaim and restore any disturbance (and mitigation as appropriate). This analysis shall be documented by Program staff for each new activity or use. A similar sequence (avoid, minimize, reclaim/restore) shall also be applicable in General Habitat, under less rigorous standards to be developed by MSGOT.

25. It is recognized that in some locations new uses or activities associated with valid rights, such as some mineral rights, may be in substantial conflict with the stipulations of this Conservation Strategy, and that reasonable exceptions to the Strategy may be necessary. Similarly, the expansion of existing uses and activities not otherwise subject to this Conservation Strategy may necessitate reasonable exception. In all cases the sequencing, stipulation, and mitigation provisions of this Conservation Strategy shall be the benchmark for evaluating such uses or activities and developing alternative operating scenarios.
26. New land uses or activities within Core Areas shall be authorized, approved, or conducted only when it can be demonstrated that the project will not cause declines in sage grouse populations.
27. Land uses or activities that follow the sequencing requirements of this Conservation Strategy (including mitigation as appropriate) and that are consistent with the stipulations set forth in Attachment D shall be deemed sufficient to demonstrate that the project will not cause declines in sage grouse populations.
28. Proposals to deviate from standard stipulations or utilize exceptions from standard stipulations will be considered by the Program (with review by MSGOT) and the appropriate land management and permitting agencies, with input from the Department of Fish, Wildlife and Parks, and the United States Fish and Wildlife Service.
29. A petition may be filed with MSGOT to create a Special Management Area, where planned land uses or activities associated with valid rights cannot be implemented after evaluation against the sequencing, stipulation, and mitigation provisions of this Conservation Strategy. The requirements and objectives for this process are contained in Attachment E, and MSGOT shall recommend such additional requirements and objectives as necessary.
30. Montana's private landowners are currently managing their lands in a responsible manner, and it is not coincidence that such a high percentage of productive sage grouse habitat is found on private land. It is critical that existing land uses and landowner activities continue to occur in Core Areas and General Habitat, particularly agricultural activities on private lands. Many uses or activities on private lands are not subject to state agency review, approval, or authorization. Only those projects occurring after the effective date of the Program which state agencies are vested with discretion by state or federal statute to review, approve, or authorize are subject to consistency review. This Conservation Strategy in no way creates, adds to, or expands the regulatory authority of any state agency.
31. Attachment F contains a list of existing land uses and landowner activities that are exempt from this Conservation Strategy.

32. Livestock grazing is the most widespread type of land use across sagebrush country. Proper livestock management is a critical tool for providing and maintaining high quality sage grouse habitat, and recommended best practices are contained in Attachment G.
33. The Governor's Executive Budget Fiscal Years 2016-2017 will include a proposal for a Sage Grouse Stewardship and Conservation Fund, designed to, among other objectives, promote and fund voluntary incentive-based non-regulatory programs and practices on private land to conserve sage grouse habitat (if approved by the Legislature).
34. Program staff and state agencies shall adhere to the stipulations contained in this Conservation Strategy when reviewing or providing consultation, or technical, financial, or other assistance for non-regulated activities.
35. The Program staff, before submitting its final recommendation to a state agency for any use or activity it has reviewed, shall comply with the provisions of the Private Property Assessment Act, Title 2, Chapter 10, Part 1, MCA.
36. State Trust Lands are held in trust as provided in The Enabling Act, and the management of those lands is vested in the State Land Board. The Department of Natural Resources and Conservation (DNRC) is directed to bring this Conservation Strategy before the Board for its consideration, with a request that the Board adopt this Strategy or otherwise determine the appropriate application of this Strategy to the management of State Trust Lands in Core or Connectivity Areas, or General Habitat.
37. Cropland conversion and sagebrush eradication on native range are particular threats to sage grouse. The DNRC is directed to bring before the State Land Board for its consideration a prohibition of these two activities on State Trust Lands in Core and Connectivity Areas and General Habitat, with criteria for waivers. The requested prohibitions should be contingent on similar action by federal agencies for lands on which they control the surface rights. The requested prohibition on cropland conversion should also be contingent on commitments by state and federal agencies to work cooperatively with the Bureau of Indian Affairs and tribal governments to address cropland conversion of sage grouse habitat on tribal lands.
38. On State Trust Lands the DNRC will work cooperatively with lessees to maintain healthy sagebrush shrub, native grass, and forb communities on State Trust grazing lands in Core and Connectivity Areas. DNRC shall develop additional lease evaluation criteria to be used for these lands, consistent with the recommendations in Attachment G. The criteria should establish rangeland characteristics that will ensure responsible grazing management practices, consistent with maintaining and improving habitat for sage grouse, while providing for working rangelands. DNRC should also develop a corrective action program for leases that fail to meet the criteria. The criteria and corrective action program shall be brought before the State Land Board for approval.
39. Exotic annual grasses and other invasive plants, and shrubs and trees, alter habitat suitability for sage grouse by reducing or eliminating native forbs and grasses essential for food and cover. Non-native annual grasses also facilitate an increase in mean fire frequency. As

resources allow, state agencies should prioritize the eradication of cheatgrass and Japanese brome in Core Areas, through improved management practices, appropriate herbicide treatments, and biological controls. The Montana Department of Agriculture should review the appropriateness of listing Japanese brome (*Bromus japonicus*) as a regulated species (priority #3) in Montana, and report to MSGOT the results of its evaluation.

40. The hunting of sage grouse is managed by the Department of Fish, Wildlife and Parks (FWP) through the Montana Fish and Wildlife Commission. A framework for conservation action to manage hunting and the viability of sage grouse populations is outlined in the Management Plan and Conservation Strategies for Sage Grouse in Montana – Final (Rev. 2-1-2005, pp. 54-55). That framework shall continue in effect and guide Department and Commission action until such time as the Department or Commission finds that a different approach is warranted. The Program shall consult with FWP when reviewing sage grouse issues in a permit application or other authorization for a use or activity in a Core or Connectivity Area, or General Habitat.
41. State agencies shall report to the Office of the Governor by no later than January 31, 2015, and annually thereafter detailing their actions to comply with this conservation strategy.

#### **DURATION**

This Executive Order is effective immediately and remains in effect until it is rescinded or superseded by subsequent Executive Order.

**NOW, THEREFORE, I, STEVE BULLOCK**, Governor of the State of Montana, by the authority vested in me under the laws and Constitution of the State of Montana, do hereby create the Montana Sage Grouse Oversight Team and the Montana Sage Grouse Habitat Conservation Program.

Given under my hand and the Great Seal of the State of Montana, this 9<sup>th</sup> day of September, 2014.

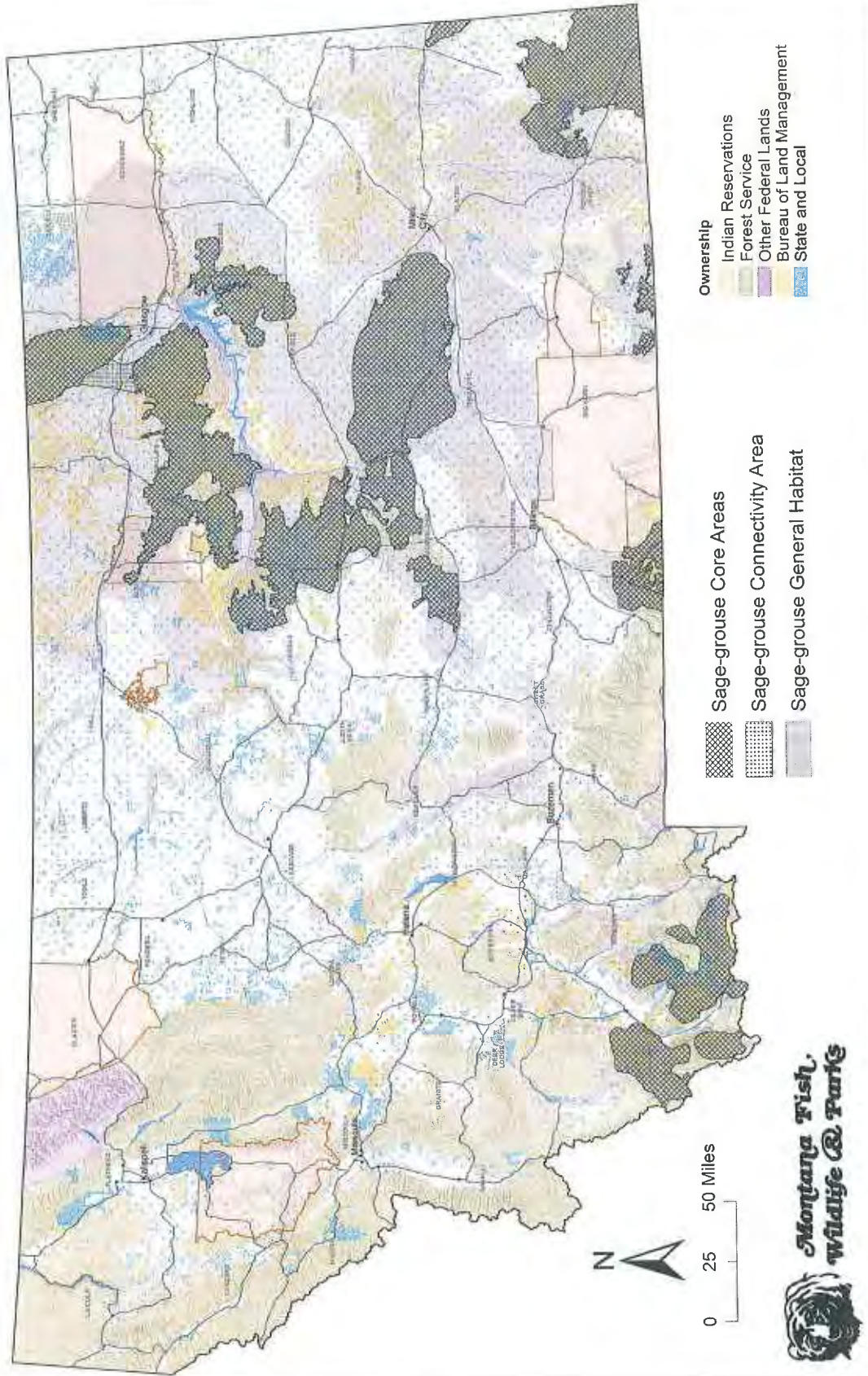


  
\_\_\_\_\_  
STEVE BULLOCK, Governor

ATTESTED:

  
\_\_\_\_\_  
LINDA McCULLOCH, Secretary of State

# Sage-grouse Conservation Areas in Montana



## Attachment B

### RECOMMENDED PRACTICES TO MINIMIZE EFFECTS OF PREDATORS

- a. Eliminate or minimize external food sources for ravens and small mammals, particularly dumps, landfills, waste transfer facilities, and road kill.
- b. Remove abandoned farmhouses, barns, building debris piles, and other structures that harbor mammalian predators.
- c. Provide adequate buffers (up to 4.0 miles from leks) between placement of new tall structures and nesting and brood-rearing habitat to minimize or eliminate the subsidy of predators. Bury power lines, when economically feasible.
- d. Remove abandoned tall structures, such as fence posts, power line poles, and cell towers that can serve as perching structures for aerial predators.
- e. Apply habitat management practices (e.g., grazing management and vegetation treatments) that improve sage grouse nesting habitat thus decreasing the effectiveness of predators.
- f. Develop strategies for specific, selective, and if needed, assertive short-term predator control based on biological assessments appropriate to local conditions, especially in instances where a sage grouse population has declined from exotic conditions, such as West Nile Virus.
- g. Request the State use localized predator control when permanent anthropogenic features are documented to contribute to unnatural numbers of predators that are reducing local sage grouse populations, and where the impacts from these permanent features will not be eliminated or minimized enough to stabilize the local sage grouse population.
- h. Research and monitor the effects of predator control to determine causal connections with sage grouse survival; modify control strategies accordingly.
- i. Encourage local government to help with small mammal predator control during sage grouse breeding, nesting, and brood-rearing season.

## Attachment C

### RECOMMENDATIONS FOR WILDFIRE PREVENTION, RESPONSE, AND REHABILITATION

Wildfire temporarily or permanently eradicates sagebrush habitat. Fire, both lightning-caused and human-caused, is a primary risk to sage grouse, not only by deteriorating and often eliminating habitat, but also by increasing future fire frequencies through the promotion of fire-prone vegetation, especially invasive grasses. The replacement of native perennial bunchgrass communities by invasive annuals is a primary contributing factor to increasing fire frequencies in the sagebrush ecosystem. The following recommendations are designed to reduce the potential for fire in sagebrush systems, suppress fires that do ignite, and (re)establish sagebrush and native species in areas that do burn.

- a. Prevention (Pre-fire):
  1. Broaden DNRC, Volunteer Fire Departments, and all fire-fighting unit awareness by providing maps of sage grouse habitat and copies of these recommendations, including every county fire-fighting office.
  2. Prioritize eradication of cheatgrass and Japanese brome and/or address management practices, acquire funding for appropriate herbicide treatments, and explore biological controls.
  3. During high-risk fire seasons, reduce risk of human caused fires as authorized by statute.
- b. Suppression (Fire -Public and firefighter safety remains the number one priority for all fire management activities):
  1. Prioritize initial attack with the goal of immediate suppression in Core Areas, and secondarily in Connectivity Areas and General Habitat, including use of fire retardants and other appropriate tools.
  2. Improve coordination between state agencies (e.g., DNRC) and Montana Association of Counties on all fire suppression activities.
  3. Request federal partners mirror the initial attack program of DNRC.
  4. Prioritize outreach from DNRC to private operators regarding initial attack in sagebrush areas.
  5. Carefully consider the use of backfires within Core and Connectivity Areas and General Habitat to minimize the potential for escape and further damage to sage grouse and sagebrush habitats (a tactical decision made in the field).

6. Identify and establish defensible fire lines in areas where: effectiveness is high; fire risk is likely; and, negative impacts from these efforts (e.g., fragmentation) are minimized. Avoid use of any vegetative stripping in healthy, unfragmented habitats, unless fire conditions and local ecological conditions so warrant.
- c. Rehabilitation (Post-fire):
1. Use available tools to prevent (re)establishment of cheatgrass and Japanese brome, as necessary.
  2. Ensure most successful restoration strategies are being implemented that (re)establish native sage grouse habitat; develop handbook of methods for most appropriate restoration strategies.
  3. Identify funding options for restoration implementation.
  4. Use locally available seeds where it is most likely to be effective and in areas of high need.
  5. Prioritize Core Areas over sagebrush areas outside of Core Areas for restoration efforts.
  6. Verify that all seeding in Core Areas is certified by an independent contractor as weed-free and free of cheatgrass and Japanese brome.
  7. Explore establishing a state seed bank, if viability of seeds can be maintained; evaluate use of local seed sources (i.e., seed orchards). Report to MSGOT.
  8. Ensure post-fire monitoring for successful reestablishment of sagebrush communities.



## Attachment D

### STIPULATIONS FOR USES AND ACTIVITIES

#### *REVIEW PROCESS*

**Point of Contact:** The first point of contact for addressing sage grouse issues in a permit application or other authorization for a use or activity in a Core or Connectivity Area, or General Habitat, should be the Montana Sage Grouse Habitat Conservation Program (Program). Project proponents need to have a thorough description of their project and identify the potential effects on sage grouse prior to submitting an application to the permitting agency (details such as draft project area, habitat maps and any other information will help to expedite the project). Project proponents should contact the Program at least 45-60 days prior to submitting their application. More complex projects will require more time. The Program has a role of consultation, recommendation, and facilitation, and has no authority to either approve or deny the project. The purpose of the initial consultation with the Program is to become familiar with the project proposal and ensure the project proponent understands the sequencing, stipulation, and mitigation provisions, and implementation process.

**Maximum Disturbance Process:** Uses and activities in Core Areas will be evaluated within the context of maximum allowable disturbance (disturbance percentages, location and number of disturbances) of suitable sage grouse habitat within the area affected by the project. The maximum disturbance allowed will be analyzed via a Density/Disturbance Calculation Tool (DDCT) process, similar to that currently utilized by the State of Wyoming. Unsuitable habitat occurring within the project area will not be included in the disturbance cap calculations. Existing disturbances shall be included.

**Process Deviations and Exceptions:** Any proposals for deviations from these stipulations, undefined activities, or exceptions must demonstrate that the proposed activities will not cause declines in sage grouse populations in core areas. Proposals to deviate from standard stipulations or utilize exceptions from standard stipulations will be considered by the Program (with review by MSGOT) and the appropriate land management and permitting agencies, with input from the Department of Fish, Wildlife and Parks, and the United States Fish and Wildlife Service.

**Permitting/Authorization:** The complete analysis package developed by consultation and review outlined herein will be forwarded to the appropriate reviewing or permitting agency. The Program recommendations will be included, as will other recommendations from project proponents and other appropriate agencies.

**Requirements for Gravel Pits:** MSGOT shall review the procedural and substantive permitting requirements contained in state law relating to gravel pits, and shall consider the need for further adjustments to these stipulations to accommodate those requirements while still protecting sage grouse, and shall recommend any further adjustments to these stipulations that may be appropriate.

**Excepted Activities:** A list of existing land uses and landowner activities that are not subject to these stipulations is provided in Attachment F.

## ***CORE AREA STIPULATIONS***

Sage grouse Core Areas were delineated as areas of highest conservation priority. These stipulations are designed to maintain existing levels of suitable sage grouse habitat by regulating uses and activities (hereafter activities) in Core Areas to ensure the maintenance of sage grouse abundance and distribution in Montana. The following stipulations apply to all new activities in Core Areas:

- 1. Surface Disturbance:** Surface disturbance will be limited to 5% of suitable sage grouse habitat averaged across the area affected by the project. The DDCT process will be used to determine the level of disturbance (and the relevant area). Distribution of disturbance may be considered and approved on a case-by-case basis, with a goal of consolidating disturbance. Unsuitable habitat should be identified in a seasonal and landscape context, on a case-by-case basis, outside the NSO buffer around leks. This will incentivize proponents to locate projects, where technically feasible, in unsuitable habitat to avoid creating additional disturbance acres. Acres of development in unsuitable habitat are not considered disturbance acres. The primary focus should be on protection of suitable habitats and protection from habitat fragmentation. The calculation of total percent disturbance shall include all existing disturbance (including wildfire), authorized but yet to be implemented activities, and proposed activities that are under consideration by the appropriate reviewing or permitting agency.
- 2. Surface Occupancy:** Within 0.6 miles of the perimeter of active sage grouse leks there will be no surface occupancy (NSO) for new activities. NSO, as used in these recommendations, means no surface facilities including roads shall be placed within the NSO area. Other activities may be authorized with the application of appropriate seasonal stipulations, provided the resources protected by the NSO are not adversely affected. For example, and absent such adverse effects, underground utilities and geophysical exploration are permissible if conducted in accordance with seasonal stipulations.
- 3. Seasonal Use:** As authorized by permitting agency or agencies, activities (production, maintenance, and emergency activity exempted) will typically be prohibited from March 15 – July 15 outside of the NSO perimeter of an active lek and within 2 miles of that perimeter in Core Areas where breeding, nesting, and early brood-rearing habitat is present. Discretionary maintenance and production activity will not occur between the hours of 4:00 - 8:00 am and 7:00 - 10:00 pm between March 15 – July 15. In areas used as winter concentration areas, exploration and development activity will be prohibited December 1 – March 15. Activities may be allowed during seasonal closure periods as determined on a case-by-case basis. Activities in unsuitable habitat also may be approved year round on a case-by-case basis.
- 4. Transportation:** Locate main roads used to transport production and/or waste products > 2 miles from the perimeter of active sage grouse leks. Locate other roads used to provide facility site access and maintenance > 0.6 miles from the perimeter of active sage grouse leks. Construct roads to minimum design standards needed for production activities.

5. **Pipelines:** Bury pipelines and restore disturbed area with native grasses, forbs and shrubs to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to benefit sage grouse and replace or enhance sage grouse habitat. Seed mixes should include two native forbs and two native grasses with at least one bunchgrass species. Landowners should be consulted on desired plant mix on private lands. The operator is required to control noxious and invasive weed species, including cheatgrass. Co-locate pipelines with roads, transmission lines, and other linear features, when possible.

6. **Overhead Power Lines and Communication Towers:** Use topographic screening and bury new lines when economically feasible, if not; locate overhead lines at least 0.6 miles from the perimeter of occupied sage grouse leks. If siting of overhead power lines is necessary within 2.0 miles of important breeding, brood-rearing, and winter habitat, follow the most current version of the Avian Power Line Interaction Committee guidelines to minimize collision potential and raptor perch sites or bury a portion of the line. Co-locate all new power lines with roads, existing power lines, or other linear features when possible.

Follow USFWS Best Management Practices for tall structures when erecting new communication towers. Locate new communication towers at least 0.6 miles from the perimeter of occupied sage grouse leks.

Anti-collision measures should be installed within 0.6 mile of the perimeter of known sage grouse concentration areas such as leks and winter ranges, where icing conditions are unlikely to occur. If effective perch preventers are identified, they should be installed within 0.6 mile of known concentration areas.

Burying existing overhead lines that have been identified as contributing to a decline in sage grouse populations will be considered as a mitigation option.

Electric utilities, including electric cooperatives, are working with the Avian Power Line Interaction Committee (APLIC), which includes federal agencies and state wildlife agencies to develop a set of Best Management Practices (BMPs) to guide construction, operation, and maintenance activities in sage grouse habitats. When this document is finalized and approved for use, it should be incorporated in this Conservation Strategy.

7. **Noise:** New noise levels from construction activities, at the perimeter of an active lek, should not exceed 10 dBA above ambient noise (existing activity included), from 6:00 p.m. to 8:00 a.m. during the initiation of breeding (March 1 – July 15), unless a site-specific noise level is agreed upon by the project proponent and Program. MSGOT shall review the emerging science on this issue, including the work being conducted regarding this issue in the State of Wyoming, and shall recommend any further adjustments in this stipulation that may be appropriate.

8. **Vegetation Removal:** Vegetation removal will be limited to the minimum disturbance required by the project. All topsoil stripping and vegetation removal in suitable habitat will occur between July 16 and March 14 in areas that are within 4.0 miles of an active

lek. Initial disturbance in suitable habitat between March 15 and July 15 may be approved on a case-by-case basis.

- 9. Sagebrush Eradication and Treatments:** Sagebrush eradication is considered disturbance and will contribute to the 5% disturbance factor, unless approved by MSGOT. Sagebrush treatments that maintain sagebrush canopy cover at or above 30% total canopy cover within the treated acres will not be considered disturbance. In stands with less than 30% cover, treatment should be designed to maintain or improve sagebrush habitat. Treatments to enhance sagebrush-grassland will be evaluated based upon the existing habitat quality and the functional level post-treatment. Restored sagebrush grassland habitats that provide effective cover and food for sage grouse should be recognized as part of the habitat base. This serves as an incentive for restoring and protecting converted habitats.
- 10. Wildfire and Prescribed Burns:** Following wildfire, it is recommended that landowners implement a management plan consistent with the rehabilitation practices in Attachment C, with a goal of returning the area to functional sage grouse habitat. The Program and MSGOT should stay abreast of evolving science regarding post-fire rehabilitation in order to advise landowners. This is specific to wildfire and not intended for other incentive or mitigation situations. The Program should be consulted in advance for any proposal to conduct prescribed burns in sagebrush habitat. Prescribed burns should be prohibited unless it can be demonstrated that they will either result in no loss of habitat or be beneficial to sage grouse habitat. Burnouts, backfires, and all other public safety measures are appropriate for fighting wildfires.
- 11. Monitoring/Adaptive Response:** Proponents of new projects are expected to coordinate with the Program and the permitting agency to determine which leks need to be monitored and what data should be collected and reported. Generally, monitoring plans should include an evaluation of affected leks as well as reference leks for control purposes. If declines in affected leks (using a three-year running average during any five-year period relative to trends on reference leks) are determined to be caused by the project, the operator will propose adaptive management responses to increase the number of birds. If the operator cannot demonstrate a restoration of bird numbers to baseline levels (established by pre-disturbance surveys, reference surveys and taking into account regional and statewide trends) within three years, operations will cease until such numbers are achieved. In the interim, the operator, permitting agency, and the Program will create additional adaptive management efforts to restore sage grouse population numbers and baseline numbers, as well as restore project operations. Natural occurrences and their effects on sage grouse and sagebrush habitat will be considered in all cases. The MSGOT shall review the work being conducted around this issue by the State of Wyoming and the U.S. Fish and Wildlife Service, and shall recommend any further adjustments to this stipulation that may be appropriate.
- 12. Reclamation:** Except for reclamation prescribed for coal mines under MSUMRA/SMCRA and their implementing regulations and permits, reclamation should re-establish native grasses, forbs and shrubs during interim and final reclamation to

achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to benefit sage grouse and replace or enhance sage grouse habitat. Seed mixes should include two native forbs and two native grasses with at least one bunchgrass species. Where sagebrush establishment is prescribed, establishment is defined as meeting the standard prescribed in the individual reclamation plan. Landowners should be consulted on desired plant mix on private lands. The operator is required to control noxious and invasive weed species, including cheatgrass.

- 13. Conifer Expansion:** For government agencies managing sagebrush in Core Areas, there should be a “no net conifer expansion” policy adopted, with criteria for approve waivers. This policy can be enacted through management plans and their implementation; stipulations in permits, leases, and licenses; and similar mechanisms. Conifer removal should be done manually, unless other methods can be shown to remove conifers without significantly impacting sagebrush. Where conifer encroachment is an issue near leks, land managers should ensure that all conifers are removed within at least 0.6 miles of leks.
- 14. Rangelands:** Rangelands on State Trust Lands will be managed in accordance with criteria to be developed by the Department of Natural Resources and Conservation, consistent with the recommendations in Attachment G, and taking into consideration the existing management practices of the lessee on surrounding non-state lands.
- 15. Existing Activities:** Areas already disturbed or approved for development within Core Areas prior to the effective date of the Program are not subject to sage grouse stipulations with the exception that existing operations may not initiate activities resulting in new surface occupancy within 0.6 miles of an active sage grouse lek. Any existing disturbance will be counted toward the calculated disturbance cap for a new proposed activity. The level of disturbance for existing activity may exceed 5%.

#### ***INDUSTRY-SPECIFIC STIPULATIONS within Core Areas***

The following industry-specific stipulations are applicable in addition to the general stipulations, and in the event of conflict, these specific stipulations control.

- 1. Oil and Gas:** Well pad densities are not to exceed an average of 1 per square mile (640 acres), and suitable habitat disturbed not to exceed 5% of suitable habitat within the DDCT. As an example, the number of well pads within a 2.0 mile radius of the perimeter of an active sage grouse lek should not exceed 11, distributed preferably in a clumped pattern in one general direction from the active lek.
- 2. Mining:**
  - a. For development drilling or ore body delineation drilling on tight centers, (approximately 50'x50') the disturbance area will be delineated by the external limits of the development area. For a widely-spaced disturbance pattern (greater

than 50' x 50'), the actual disturbance footprint will be considered the disturbance areas.

- b. Sage grouse monitoring results will be reported in the mine permit annual report, and to the Program. Pre-disturbance surveys will be conducted as required by the appropriate regulatory agency.
- c. The number of active mining development areas (e.g., operating equipment and significant human activity) are not to exceed an average of one area per square mile (640 acres) within the DDCT. An active mining development area is any single mine site or series of contiguous mine sites that will be mined in a continuous, cast-back fashion.
- d. Surface disturbance and surface occupancy stipulations will be waived when implementing underground mining practices that are necessary to protect the health, welfare, and safety of miners, mine employees, contractors and the general public. The mining practices include but are not limited to bore holes or shafts necessary to: 1) provide adequate oxygen to an underground mine; 2) supply inert gases or other substances to prevent, treat, or suppress combustion or mine fires; 3) inject mine roof stabilizing substances; and 4) remove methane from mining areas. Any surface disturbance or surface occupancy necessary to access the sites to implement these mining practices will also be exempt from any stipulation.
- e. Mining permits will include requirements for mitigation, including, where appropriate, off-site mitigation that enhances or promotes sage grouse genetic diversity, critical habitat, connectivity, and population viability.

### **3. Coal Mining:**

- a. Coal mining operations will be allowed to continue under the terms and conditions included in permits issued by the Montana Department of Environmental Quality under the authority of the Montana Strip and Underground Mine Reclamation Act (MSUMRA) and the federal Surface Mining Control and Reclamation Act (SMCRA) and imposed by those statutes' implementing state and federal regulations.
- b. Coal mining operations are generally governed by MSUMRA and SMCRA under this Conservation Strategy, and those laws are the mechanisms by which this Conservation Strategy is applied to coal mining operations. This Strategy shall not preclude federal leasing.
- c. New coal mining operations, including expansions into or within Core Areas, requires permitting under MSUMRA/SMCRA.

- 4. **Wind Energy:** Wind energy development should be avoided in sage grouse core areas. An exception may be made if it can be demonstrated by the project proponent using the

best available science that the development will not cause a decline in sage grouse populations.

### ***GENERAL HABITAT STIPULATIONS***

The health of General Habitat areas is a critical element in the effort to maintain the abundance and distribution of sage grouse in Montana. Development scenarios in General Habitat are more flexible than in Core Areas, but should still be designed and managed to maintain populations, habitats, and essential migration routes, since this Conservation Strategy requires habitat connectivity and movement between populations in Core Areas. In all General Habitat areas, the following stipulations apply:

1. **Surface Occupancy:** Within 0.25 miles of the perimeter of an active sage grouse lek there will be no surface occupancy (NSO).
2. **Surface Disturbance:** There are no specific surface disturbance limits in General Habitat. However, as a standard management practice surface disturbance should be minimized, through measures such as co-locating new and existing structures. Structures and associated infrastructure will be removed and areas reclaimed.
3. **Seasonal Use:** Activities (production and maintenance activity exempted) will be prohibited from March 15 – July 15 within 2.0 miles of an active lek where breeding, nesting, and early brood-rearing habitat is present. Discretionary maintenance and production activity will not occur between the hours of 4:00 - 8:00 am and 7:00 - 10:00 pm between March 15 – July 15. In areas used as winter concentration areas, exploration and development activity will be prohibited December 1 – March 15. Activities may be allowed during seasonal closure periods as determined on a case-by-case basis. This stipulation may be modified or waived for areas of unsuitable habitat. Any deviations from this stipulation for unsuitable habitat will be determined by the applicable permitting agency in coordination with the Program.
4. **Overhead Power Lines and Communication Towers:** New overhead power lines and communication towers will be located outside of General Habitat when possible. Where avoidance is not possible, develop a route or siting location that uses topography, vegetative cover, site distance, etc., to effectively protect identified sage grouse habitat in a cost-efficient manner. If siting of overhead power lines is necessary within 2.0 miles of important breeding, brood-rearing, and winter habitat, follow the most current version of the Avian Power Line Interaction Committee guidelines to minimize collision potential and raptor perch sites or bury a portion of the line. Site new lines in existing corridors wherever practicable.
5. **Noise:** New noise levels from construction activities, at the perimeter of an active lek, should not exceed 10 dBA above ambient noise (existing activity included), from 6:00 p.m. to 8:00 a.m. during the initiation of breeding (March 1 – July 15), unless a site-specific decibel level is agreed upon by the project proponent and Program. MSGOT shall review the emerging science on this issue, including the work being conducted

regarding this issue in the State of Wyoming, and shall recommend any further adjustments in this stipulation that may be appropriate.

6. **Vegetation Removal:** Vegetation removal as part of permitted activities will be limited to the minimum disturbance required by the project.
7. **Sagebrush Treatments:** Treatments to enhance sagebrush-grassland will be evaluated based upon the existing habitat quality and the functional level post-treatment. Restored sagebrush grassland habitats that provide effective cover and food for sage grouse should be recognized as part of the habitat base. This serves as an incentive for restoring and protecting converted habitats.
8. **Wildfire and Prescribed Burns:** Suppression of wildfire in General Habitat will be emphasized, recognizing that other local, regional, and national suppression priorities may take precedent. Public and firefighter safety remains the number one priority for all fire management activities. The Program should be consulted in advance for any proposal to conduct prescribed burns in sagebrush habitat. Prescribed burns should be prohibited unless it can be demonstrated that they will either result in no loss of habitat or be beneficial to sage grouse habitat. Burnouts, backfires, and all other public safety measures are appropriate for fighting wildfires.
9. **Reclamation:** Reclamation should re-establish native grasses, forbs, and shrubs during interim and final reclamation. The goal of reclamation is to achieve cover, species composition, and life form diversity commensurate with the surrounding plant community or desired ecological condition to benefit sage grouse and replace or enhance sage grouse habitat to the degree that environmental conditions allow. Landowners should be consulted on the desired plant mix on private lands. The operator is required to control noxious and invasive plant species, including cheatgrass (*Bromus tectorum*) and Japanese brome (*Bromus japonicus*).
10. **Rangelands:** When possible, rangelands on State Trust Lands should be managed consistent with the recommendations in Attachment G, taking into consideration the existing management practices of the lessee on surrounding non-state lands.
11. **Oil and Gas, Mining:** Encourage development in incremental stages to stagger disturbance and design schedules that include long-term strategies to localize disturbance and recovery within established zones over a staggered time frame. Remove facilities and infrastructure and reclaim when use is completed, including for exploration activities.
12. **Other Mining:**
  - a. Sage grouse monitoring results will be reported in the mine permit annual report, and to the Program. Pre-disturbance surveys will be conducted as required by the appropriate regulatory agency.



- b. Surface occupancy stipulations will be waived when implementing underground mining practices that are necessary to protect the health, welfare, and safety of miners, mine employees, contractors and the general public. The mining practices include but are not limited to bore holes or shafts necessary to: 1) provide adequate oxygen to an underground mine; 2) supply inert gases or other substances to prevent, treat, or suppress combustion or mine fires; 3) inject mine roof stabilizing substances; and 4) remove methane from mining areas. Any surface disturbance or surface occupancy necessary to access the sites to implement these mining practices will also be exempt from any stipulation.
- c. Mining permits will include requirements for mitigation, including, where appropriate, off-site mitigation that enhances or promotes genetic diversity, critical habitat, connectivity, and population viability.

### **13. Coal Mining:**

- a. Coal mining operations are generally governed by MSUMRA and SMCRA under this Conservation Strategy, and those laws are the mechanisms by which this Conservation Strategy is applied to coal mining operations. This Strategy should not preclude federal leasing.
- b. Conservation measures will be developed for coal mining operations on a case-by-case basis via the terms and conditions included in permits issued by MDEQ under the authority of the Montana Strip and Underground Mine Reclamation Act (MSUMRA) and in compliance with the federal Surface Mining Control and Reclamation Act (SMCRA).

**14. Wind Energy:** New wind energy developments are not recommended within 4.0 miles of the perimeter of active sage grouse leks, unless it can be demonstrated that the development cannot reasonably meet this setback and will not cause a decline in sage grouse populations. Any development must adhere to the *U.S. Fish and Wildlife Service Land-Based Wind Energy Guidelines*, and project developers should work cooperatively with agencies, utilities, and landowners to use topography, vegetative cover, site distance, etc. to effectively protect identified sage grouse habitat.

### ***CONNECTIVITY HABITAT STIPULATIONS***

Connectivity habitat includes those areas that provide important linkages among populations of sage grouse, particularly between Core Areas or priority populations in adjacent states and across international borders. Only one sage grouse connectivity area has been identified (Montana-Saskatchewan Connectivity Area in Valley County). Research continues, based on genetics work, to better define the composition of other possible priority Connectivity Areas. MSGOT shall study and recommend the stipulations that are necessary in Connectivity areas to prevent a decline in sage grouse populations. In the interim, the Valley County Connectivity area shall be subject to the stipulations for General Habitat.

## Attachment E

### Special Management Areas

A petition may be filed with the Program to create a Special Management Area (SMA), where planned land uses or activities associated with valid rights cannot be implemented after evaluation against this Conservation Strategy.

1. Petitions may be submitted to the Program to create a new SMA. The Petition shall be submitted by the project developer (holder of valid rights).
2. The Petition shall contain: a geographic description of the area proposed to be created and a detailed description of the number and location of the sage grouse lek(s) within the area; an evaluation of how the creation of the proposed SMA would impact the Core Area function relative to the sage grouse; and, an explanation of the rationale for the creation of the SMA.
3. The Petitioner shall submit a proposed conservation plan (including plans for off-set mitigation) and shall work in cooperation with both the Program and reviewing/permitting agency to develop an acceptable plan to be submitted to the MSGOT for review. The conservation goal of the plan is to maintain and restore seasonal sage grouse habitats that support viable sage grouse populations. As industrial activities subside, these populations are expected to expand into vacant functional habitats.
4. All applicable Core Area stipulations will apply to the SMA until the conservation plan has been recommended for approval by MSGOT and subsequently approved by the appropriate agency. The conservation plan will follow the mitigation framework developed by MSGOT and shall include a noise abatement stipulation, a strategy for restoration/reclamation within the Core Area(which results in a long-term reduction in surface disturbance), a proposal for off-set mitigation, and a monitoring component using peer-reviewed scientific methods that is designed to monitor sage grouse populations, the impact of development, and restoration efforts on sage grouse populations, and provide feedback if adjustments are needed in the conservation plan to reduce impacts on sage grouse populations.
5. In evaluating whether to recommend approval of the creation of the new SMA, the MSGOT shall consider how the creation of an SMA will impact the habitat and population of sage grouse both within the Core Area and on a statewide basis.
6. MSGOT shall evaluate the need for a cap on the number of sage grouse impacted by SMAs (i.e., the population of sage grouse impacted by all SMAs may not exceed a specific population, measured by the number and size of leks impacted or a similar population metric), and shall make a recommendation in this regard.
7. The MSGOT must develop a process where designated SMAs can be reclassified. This process should be based on metrics measuring the quantity and quality of sage grouse

habitat restored and/or reclaimed, as well as the documented use of that habitat by sage grouse.

MSGOT should recommend such additional requirements and objectives as necessary.

## Attachment F

### EXEMPT ACTIVITIES

The following existing land uses and landowner activities are exempt from compliance with this strategy:

- a. Existing animal husbandry practices (including branding, docking, herding, trailing, etc.).
- b. Existing farming practices (excluding conversion of sagebrush/native range to cropland agriculture).
- c. Existing grazing operations that meet rangeland health standards or utilize recognized rangeland management practices (for example, allotment management plans, Natural Resource and Conservation Service grazing plans, prescribed grazing plans, etc.).
- d. Construction of agricultural reservoirs and aquatic habitat improvements less than 10 surface acres and drilling of agriculture and residential water wells (including installation of tanks, water windmills, and solar water pumps) more than 0.6 miles from the perimeter of a lek in Core Areas and more than 0.25 miles from a lek in General Habitat or Connectivity Areas. Within 0.6 miles of a lek in Core Areas and within 0.25 miles of a lek in General Habitat or Connectivity Areas, no review is required if construction does not occur March 15 – July 15 and construction does not occur on the lek. All water tanks shall have bird escape ramps.
- e. Agricultural and residential electrical distribution lines more than 0.6 miles from a lek in Core Areas and 0.25 miles from a lek in General Habitat or Connectivity Areas. Within 0.6 miles of a lek in Core Areas and within 0.25 miles of a lek in General Habitat or Connectivity Areas, no review is required if construction does not occur between March 15 – July 15 and construction does not occur on the lek. Raptor perching deterrents shall be installed on all poles within 0.6 or 0.25 miles, respectively, from leks, if they are proven to be effective according to Avian Power Line Interaction Committee guidance. Other management practices, such as vegetation screening and anti-collision measures, should be applied to the extent possible. Routine maintenance of existing power lines conducted between July 16 – March 14 is also an exempt activity.
- f. Pole fences. Wire fences if fitted with visibility markers where high potential for sage grouse collisions has been documented.
- g. Irrigation (excluding the conversion of sagebrush/grassland to new irrigated lands). Tribal lands under existing and future state water compacts.
- h. Spring development if the spring is protected with fencing and enough water remains at the site to provide mesic (wet) vegetation.

- i. Herbicide and pesticide use except for in the control of sagebrush and associated native forbs. Grasshopper/Mormon cricket control following Reduced Agent-Area Treatments (RAATS) protocol.
- j. County road maintenance.
- k. Production and maintenance activities associated with existing oil, gas, communication tower, and power line facilities in compliance with approved authorizations.
- l. Low impact cultural resource surveys.
- m. Emergency response.

## Attachment G

### RECOMMENDATIONS FOR RANGE AND DISEASE (West Nile) MANAGEMENT

The following recommendations outline voluntary management practices for private lands to maintain or enhance sage grouse populations and habitats. Whenever possible, adherence to these recommendations is encouraged.

#### Range Management

Livestock grazing is the most widespread type of land use across the sagebrush biome. Although improper livestock management, as determined by local ecological conditions, may have negative impacts on sage grouse seasonal habitats, proper livestock management is a critical tool for providing and maintaining high quality sage grouse habitat. Range management structures and fences necessary for proper grazing management can also be placed or designed to be neutral or beneficial to sage grouse. The following recommendations are intended to support grazing management as a tool for providing quality sage grouse habitat.

- a. Landowners in sage grouse Core and Connectivity Areas and General Habitat are encouraged to adopt the Sage grouse Initiative grazing practices and range management recommendations, including:
  1. Rotating livestock to different pastures, while resting others to establish a diversity of habitat types.
  2. Changing seasons of use within pastures to ensure all plants have the ability to reproduce.
  3. Leaving residual cover (grass from the past season) to increase hiding and nesting cover for sage grouse.
  4. Managing the frequency and intensity of grazing to sustain native grasses, wildflowers, and shrubs.
  5. Managing livestock access to water to ensure healthy livestock and healthy watersheds.
- b. Range management structures should be designed and placed to be neutral or beneficial to sage grouse.
- c. Structures that are currently contributing to negative impacts to either sage grouse or their habitats should be removed or modified to remove the threat.
- d. Mark fences that are in high risk areas for collision with permanent flagging or other suitable device to reduce sage grouse collisions.
- e. Identify and remove unnecessary fences.

- f. Placement of new fences and livestock management facilities (including corrals, loading facilities, water tanks, and windmills) should consider their impact on sage grouse and, to the extent practicable, be placed at least 0.6 miles from active leks.

### **Disease Management (West Nile virus)**

West Nile virus was a new source of mortality for sage grouse, particularly in low and mid-elevation populations, from 2003 – 2007. If there is a West Nile virus outbreak that significantly reduces sage grouse populations, the MSGOT should look at a local site-specific strategy for enhancing the sage grouse population. Elimination of anthropogenic-created habitat for the mosquito vectors of West Nile virus is an important conservation measure for sage grouse, and the following recommendations are intended to further this objective.

- a. Construct ponds to reduce prevalence of mosquitoes that transmit West Nile virus consistent with current BLM guidance (see, A Report on National Sage grouse Conservation Measures, Appendix C: BMPs for how to make a pond that won't produce mosquitoes that transmit West Nile virus).
- b. Manage ponds to reduce prevalence of mosquitoes that transmit West Nile virus.
- c. Other management actions to reduce prevalence of mosquitoes that transmit West Nile virus include erection of bat houses, and managing containers, wood piles, and tire storage facilities that harbor breeding or overwintering mosquitoes and/or larvae.

## Attachment H

### DEFINITIONS

Suitable Habitat – is within the mapped occupied range of sage grouse, and:

1. Generally has 5% or greater canopy cover of sagebrush, where “sagebrush” includes all species and sub-species of the genus *Artemisia*. This excludes mat-forming subshrub species such as *A. frigida* (fringed sagewort) and *A. pedatifida* (birdfoot sage). Sagebrush canopy cover may be less than 5% when complimented by other shrubs suitable for sage grouse cover requirements; or
2. Is moist meadow containing forbs suitable for brood-rearing within 300 yards of suitable sagebrush cover (as defined above). Introduced species such as alfalfa may be very important on these sites where native forbs are not available.

Vegetation monitoring to determine habitat suitability will follow the Habitat Assessment Framework, available at [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications\\_Directorate/public\\_affairs/sage\\_grouse\\_planning/documents.Par.23916.File.dat/SG\\_HABITATASESSMENT0000669.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications_Directorate/public_affairs/sage_grouse_planning/documents.Par.23916.File.dat/SG_HABITATASESSMENT0000669.pdf)

Unsuitable Habitat – is land within the historic range of sage grouse that did not, does not, nor will not provide sage grouse habitat due to natural ecological conditions such as badlands or canyons.

Surface Disturbance – includes any conversion of formerly suitable habitat to grasslands, croplands, mining, well pads, roads, or other physical disturbance that renders the habitat unusable for sage grouse.

Lek Status -

- Active - Data supports existence of lek. Supporting data defined as 1 year with 2 or more males lekking on site followed by evidence of lekking within 10 years of that observation.
- Inactive - A confirmed active lek with no evidence of lekking for the last 10 years. Requires a minimum of 3 survey years with no evidence of lekking during a 10 year period.
- Extirpated - Habitat changes have caused birds to permanently abandon a lek as determined by the biologists monitoring the lek.
- Unconfirmed - Possible lek. Sage grouse activity documented. Data insufficient to classify as active status.

Valid Right(s) – legal “rights” or interest that are associated with land or mineral estate and that cannot be divested from the estate until that interest expires, is relinquished, or acquired.

Habitat Exchange - an efficient, effective approach to wildlife conservation in America, developed in partnership by private landowners, industry, environmental groups, academics and



government. In a Habitat Exchange, landowners and industry are given financial incentives to conserve wildlife habitat. Landowners benefit by earning revenue from credit sales and developers benefit by meeting conservation objectives or regulatory requirements with less red tape.

**From:** Magaletti, Matthew  
**Sent:** Wednesday, February 18, 2015 11:27 AM  
**To:** Stephanie Carman; Edwin Roberson  
**Subject:** MT NPT Allocation Review (Summer 2014)  
**Attachments:** Miles City\_WO\_Memo\_5-20-14.docx; WO response to MT Rationale\_6\_10\_14.docx

Hi Stephanie and Ed,

Last summer, we reached out to the BLM to ensure that they were following the April 2014 NPT allocation guidance. During this time, we (WO) did not catch any inconsistencies (particularly as it relates to compliance with fluid minerals in GH) in MT. Attached is a memo from BLM MT (for Miles City) to AD-200, in addition to the WO follow-up from that memo.

So - I am guessing something was incorrectly modified when we were making changes to the national allocation table between October and January. It certainly could have been an error on my part.

--

**Matthew Magaletti**

Rocky Mountain Region Sage Grouse Coordinator (Acting)  
Bureau of Land Management  
(307) 775-6329

## INFORMATION MEMORANDUM FOR THE ASSISTANT DIRECTOR, RESOURCES AND PLANNING

FROM: Jamie Connell, State Director, BLM Montana, 406 896-5012

SUBJECT: Miles City RMP Revision: Sage-Grouse Allocation Decisions and Conservation

DATE: May 23, 2014

### I. INTRODUCTION

The Miles City Field Office RMP Revision (MCFO RMP) planning area consists of 3.3 million acres of Bureau of Land Management and U.S. Forest Service (FS) surface estate and about 11.4 million acres of federal mineral estate in Management Zone I. Approximately 19 million acres of the land surface is private or state-owned. BLM surface estate encompasses over 800,000 acres of Priority Habitat and 1.4 million acres of General Habitat. For national context, the MCFO RMP planning area contains approximately 0.07 percent of the range-wide Priority Habitat and 0.04 percent of the range-wide General Habitat. Identified potential widespread threats include habitat loss, fragmentation, and deterioration of habitat resulting from infrastructure development, energy development, conversion of sagebrush habitats to nonnative species or agriculture, and conifer invasion. Given the highly fragmented nature of land ownership across the Priority Habitat areas within the planning area, factors outside of the BLM/FS management authority may determine actual sage-grouse population trajectories.

### II. BACKGROUND

The Administrative Draft Proposed Plan (ADPP), developed in coordination with and supported by Federal and state partners, addresses the objectives of the Conservation Objectives Final Report (COT Report) and required policies and directives. Throughout the RMP process, the BLM has coordinated with the U.S. Fish and Wildlife Service (FWS) and the State of Montana to conserve Greater Sage-Grouse (GRSG) - from the analysis of the management situation to the development of the ADPP. The FWS provided the final COT threat assessment table as part of their public comments and BLM held subsequent meetings with the FWS to discuss, clarify and resolve issues identified in the table. The FWS primary concern was the need for additional clarity concerning the conservation measures within the document. The BLM has addressed all the concerns presented in the table and provided additional clarity of conservation measures in the plan.

The cross-jurisdictional concerns associated with the Miles City planning effort concern habitats that span the borders with North Dakota and Wyoming. There were slight differences in how the three states mapped habitat. No GRSG habitat exists on FS lands within the planning area. The Governor of Montana has yet to issue a planned Sage-Grouse Conservation Executive Order that will outline how the State of Montana will address GRSG conservation; therefore, it is not possible at this time to fully determine how the ADPP will compare with the potential State regulatory mechanisms or management actions to protect and conserve GRSG and GRSG habitats.

### III. POSITION of INTERESTED PARTIES

The State of Montana manages GRSG and their habitats, and the BLM has engaged the state in the development of the ADPP. The ADPP limits disturbance density and intensity in Priority Habitat. The mitigation strategy (avoid, minimize, compensate) applies to all occupied GRSG habitat. Further, the ADPP includes an adaptive management strategy that includes both soft and hard triggers. Thus, all Priority Habitat managed by the BLM is protected from impacts associated with right-of-way, fluid minerals, and mining developments. The ADPP (which applies to federal lands), when coupled with the pending Executive Order from the Governor of Montana (which is anticipated to apply to all land whenever a state authorization is required), provides cooperative landscape-level management for the conservation of GRSG which transcends ownership boundaries. This illustrates the added value of engaging all stakeholders and governmental partners in long-term, range-wide GRSG conservation efforts, particularly in landscapes with mixed and fragmented land ownership patterns.

Key land use allocations are as follows:

#### **Renewable Energy**

Rights-of-way (ROWs) associated with wind energy are excluded in Priority Habitat and avoided in General Habitat. Solar energy ROWs are managed the same as other ROWs (see below under Other ROW's). All ROW developments proposed in Priority Habitat must meet the surface disturbance limits, mitigation, and other conservation measures.

#### **High-Voltage Transmission Lines and Major Pipeline Rights-of-Way**

These types of ROW actions were not separated in any alternative in the draft plan. These ROW actions would be addressed the same as other ROWs (see below under Other ROWs).

#### **Other (Minor) Rights-of-Way**

The ADPP avoids all rights-of-way in Priority Habitat. All ROW developments proposed in Priority Habitat must meet goals and objectives for Priority Habitat, surface disturbance limits, mitigation, and other conservation measures. In General Habitat, the ADPP imposes mitigation measures and conservation actions on ROW proposals.

#### **Fluid Minerals**

The ADPP eliminated surface disturbance associated with oil and gas development through a No Surface Occupancy (NSO) stipulation in Priority Habitats with strict waiver, modification, and exception criteria.

General Habitat is "open" with constraints including NSO stipulations near leks and Controlled Surface Use stipulations to protect breeding activities and winter concentration areas.

#### **Non-Energy Leasables**

There are no known deposits or the potential for the development of non-energy leasables in the planning area and management actions for non-energy leasables were therefore included in the "Alternatives Considered, but not Analyzed" portion of the document.

**Mineral Materials**

The draft RMP did not separate free use and commercial use permits for mineral materials in any alternative in the draft plan. Priority Habitat will remain Open for mineral material sales. All mineral material sales proposed in Priority Habitat must meet goals and objectives for Priority Habitat, surface disturbance limits, mitigation, and other conservation measures. General Habitat is open for mineral material sales and all mineral material sales proposed in General Habitat must meet goals and objectives for General Habitat, mitigation, and other conservation measures.

**Disturbance**

The ADPP imposes a 3 percent disturbance cap in Priority Habitat. The disturbance calculation uses fine-scale mapping using 1-meter resolution and takes into account disturbance on all lands and arising from all activities which remove sagebrush habitat, including agriculture, vegetation treatments, and wildfire. The draft state plan also proposes to limit disturbance in Priority Habitat, however the draft state plan proposes a 5 percent disturbance cap.

<b>Allocations/Disturbance</b>	<b>Consistent with National Policy Team Recommendations</b>	<b>Alternative Measures and Rationale</b>
Solar/Wind ROWs	<b>PH</b> – Yes <b>GH</b> – Yes	<ul style="list-style-type: none"> <li><i>Solar was not considered separately in any alternative in the draft because there is no potential for commercial solar (not considered threat) – it would be included in general ROWs – avoidance for PH.</i></li> </ul>
High-Voltage Transmission Lines and Major Pipeline ROWs	<b>PH</b> – Yes <b>GH</b> – No	<ul style="list-style-type: none"> <li><i>ROW decisions were not separated into major and minor categories in any alternative in the draft RMP.</i></li> </ul>
Other (Minor) ROW and Land Use Authorizations	<b>PH</b> – Yes <b>GH</b> - Yes	<ul style="list-style-type: none"> <li><i>Mixed ownership pattern – potential result of exclusion in PH would be to push development onto better GRSG habitat on private (essential to maintain cooperation with state/private to effectively manage for best GRSG habitat).</i></li> </ul>
Fluid Minerals	<b>PH:</b> Yes <b>GH</b> – Yes	<ul style="list-style-type: none"> <li><i>Existing leases within habitat, if developed will have Mitigation measures and conservation actions applied as Conditions of Approval (COAs) for the decision record.</i></li> </ul>
Non-energy Leasables	<b>PH</b> – No <b>GH</b> - No	<ul style="list-style-type: none"> <li><i>Included in the "Alternatives Considered but not Analyzed" section of the RMP.</i></li> <li><i>No known occurrence of non-energy leasables is found in the planning area.</i></li> </ul>
Mineral Materials	<b>PH</b> – No <b>GH</b> - Yes	<ul style="list-style-type: none"> <li><i>The draft RMP did not separate free use and commercial use permits for mineral materials</i></li> </ul>

		<p><i>in any alternative in the draft plan. Priority Habitat will remain Open for mineral material sales. All mineral material sales proposed in Priority Habitat must meet goals and objectives for Priority Habitat, surface disturbance limits, mitigation, and other conservation measures. General Habitat is open for Mineral Material sales and all Mineral Material sales proposed in General Habitat must meet goals and objectives for General Habitat, mitigation, and other conservation measures.</i></p>
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Signed by:  
 Katherine P. Kitchell  
*for* Jamie E. Connell  
 State Director

Authenticated by:  
 Janie Fox  
 Staff Assistant (MT920)

To: Jamie Connell, MT State Director

From: Ed Roberson AD-200

RE: Allocation Memo

Date: June 9, 2014

At this time our focus is on the allocation piece and future discussions will occur regarding disturbance and how it is measured as well as the adaptive management strategy.

Concerns related to LUP Objective for Priority Habitat:

- At this time, we recommend that the footnote related to the use of the Density and Disturbance Calculation Tool (DDCT) process be removed.

Concerns related to the Action Suitability Screen and Mitigation Process

- It is unclear how the screening process that will be used for implementation level activities is beneficial for the Greater Sage-grouse vs. simply applying the NPT recommended allocation to Priority and General Habitats.
- As part of the screening process, there is a list of 5 questions to be answered before a project is approved in sage-grouse habitat. It is unclear who will be making the final determination on the responses to these questions and whether this process is consistent with the Mitigation Framework that the other sub-regions will be using?

Concerns related to Allocation Matrix

*South Dakota Revision*

- Not closing PH to mineral materials - The rationale for deviating from the NPT allocation recommendations revolves around the fact that a project may be better suited on public lands if there is better suited habitat on private (where the development would be pushed to if Federal lands are closed). It is unclear if there is some level of assurance that if BLM does not propose closing PH to mineral materials, then there are protective measures in place on private lands to prevent additional disturbance.

*Miles City Revision*

- Not excluding solar developing in PH and closing PH to non-energy leasables and mineral materials - the rationale for not carrying forward these NPT allocation recommendations was due to the fact that the measure was not analyzed in the draft or was not an issue for that planning area. Did the draft revisions analyze a conservation based alternative which excluded ROWs, closed non-energy leasables, and closed mineral material development from occupied sage-grouse habitat?

*Hi-Line Revision*

- Same comment as South Dakota in regards to mineral materials in PH.

*Billings Revision*

- Same comment as Miles City in regards to non-energy leasables in PH.

*Lewistown Amendment*

- Same comment as Miles City in regards to mineral materials in PH.

*North Dakota Amendment*

- The additional rationale provided did not include additional justification as to why North Dakota is not applying an adaptive management strategy or the 3% disturbance.
- It is also unclear how BLM Montana plans to decrease the 18% disturbance that already exists in the planning area and where this figure was originated from.

**WO Recommendations:** While the WO understands the constraints associated with the scattered land ownership pattern in Montana/Dakotas, it is unclear how it is biologically sound to use the screening process versus the NPT allocation recommendations. It is recommended that BLM Montana/Dakotas consider using the NPT allocation recommendations.



**From:** Lauren Mermejo  
**Sent:** Tuesday, July 14, 2015 2:35 PM  
**To:** Anthony Titolo; Stephanie Carman; Matthew Magaletti  
**Cc:** Frank Quamen  
**Subject:** RE: Another Question from ID

Only if their plan allows for IHMA to be part of the 3% disturbance calculation...

L

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**From:** Anthony Titolo [mailto:[atitolo@blm.gov](mailto:atitolo@blm.gov)]  
**Sent:** Tuesday, July 14, 2015 2:09 PM  
**To:** Stephanie Carman; Matthew Magaletti; Lauren Mermejo  
**Cc:** Quamen, Frank R  
**Subject:** Another Question from ID

For the BSU map, we stated that it should show BSU boundaries and PHMA within it (all lands). The monitoring framework makes no mention of conducting disturbance analysis on anything but PHMA within BSUs and I believe the addition of this BSU maps was to illustrate where disturbance calcs would occur. Diane stated that their BSUs are a "subset of PHMA and IHMA". Should she include the IHMA in her BSU map?

Thanks,  
Anthony

Anthony Titolo  
Natural Resources Assessment Project Manager  
BLM National Operations Center  
Denver Federal Center, Building 40  
303-236-0446

**From:** Kelleher, Karen  
**Sent:** Wednesday, August 26, 2015 7:59 AM  
**To:** Carman, Stephanie  
**Cc:** Amy Lueders  
**Subject:** Re: Idaho state plan- IMPORTANT

had some conversation back & forth with Jim & Tim. I think we are ok on this fire.  
Karen

On Wed, Aug 26, 2015 at 8:36 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

From the ROD:

The BLM will also work with the state of Idaho in setting priorities for the review and processing of grazing permits/leases in SFAs consistent with the methodology recommended by the State of Idaho in its proposed plan for the management of BLM-administered lands in the state.

In the ARMPA, Grazing Section, Management Decisions (new language underlined):

**MD LG 15:** The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. Management and conservation action prioritization will occur at the Conservation Area (CA) scale and be based on GRSG population and habitat trends: Focusing management and conservation actions first in SFAs followed by areas of PHMA outside SFA. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (e.g., fire) and legal obligations.

**MD LG 17:** Allotments within SFAs, followed by those within PHMAs, and focusing on containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks can include monitoring for actual use, utilization, and use supervision. Management and conservation action prioritization will occur at the Conservation Area (CA) scale and be based on GRSG population and habitat trends: Focusing management and conservation actions first in SFAs followed by areas of PHMA outside SFA.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Wed, Aug 26, 2015 at 8:11 AM, Amy Lueders <[alueders@blm.gov](mailto:alueders@blm.gov)> wrote:

Heads up

Sent from my iPhone

Begin forwarded message:

**From:** James Lyons <[james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov)>  
**Date:** August 26, 2015 at 7:55:05 AM EDT  
**To:** Karen Kelleher <[kkelleh@blm.gov](mailto:kkelleh@blm.gov)>  
**Cc:** Lueders Amy <[alueders@blm.gov](mailto:alueders@blm.gov)>  
**Subject:** Idaho state plan- IMPORTANT

When I was last in Idaho, we agreed with the state of Idaho and the state's two lead legislators to include in the Idaho plan some language to further prioritize reviews of grazing permits in SFAs to first give emphasis to areas where SG population declines had occurred. Tim Murphy was to send us that language for review before he put it in the plan. This was only to occur in Idaho given their unique capacity to monitor SG populations on a localized basis per Connelly.

I do recall seeing that language referenced under the "unique" aspects of the plans portion of the GB ROD for Idaho. Last sentence, second paragraph.

Could you please track this down today? It needs to be in the Idaho plan and I would like to see what it says having led the conversation in Boise.

Thanks.

Jim

Sent from my iPhone

--

Karen Kelleher

BLM Analyst-Liaison ASLM

Main Interior room 6324

[kkelleh@blm.gov](mailto:kkelleh@blm.gov)

202-208-4555

**From:** Foss, Jeffery  
**Sent:** Wednesday, April 15, 2015 6:41 AM  
**To:** Steve Ellis  
**Cc:** Stephanie Carman  
**Subject:** State of Idaho Sage grouse concerns  
**Attachments:** State of Idaho Concerns 3\_3\_15.pdf

Steve

Here is the document we shared previously that was given to us by the State of Idaho (Tom Perry) on March 3 that outlines the State's concerns. As I indicated on the phone, our plan does address ecological site potential. The 7" stubble height pertains to perennial grass height in nesting and early brood rearing habitat.

Jeff

**Jeff Foss**  
**Acting State Director-Idaho BLM**  
**1387 S. Vinnell Way, Boise, ID 83709**  
**208-373-3800 or 373-4001**  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

3/3/15

## STATE OF IDAHO'S CONCERNS WITH THE NATIONAL DIRECTION

- **Sage-Grouse Focal Areas: Idaho is not inclined to support this proposal.**
  - The current map is the product of significant negotiations not only between the Governor's Sage-Grouse Task Force, but also with the relevant federal agencies.
  - The U.S. Fish and Wildlife Service (Service) concurred with the State's map on April 10, 2013, and since that time, discussions between Idaho and the federal agencies has resulted in an increase in the Core Habitat Zone.
  - The Core Habitat Zone (CHZ) effectively conserves 65% of the active leks occupied by approximately 73% of the males attending those leks. The State believes that no additional conservation benefit will result from this new designation.
  - Adding these focal areas effectively creates a fourth zone for the State of Idaho. The zonal approach with the adaptive management triggers is a key feature to mitigate against the impacts of wildfire. Creating a fourth zone will complicate and frustrate this scheme.
  - The mineral withdrawal recommendation is problematic to the State – we need to better understand the potential impact to industry.
  - At a minimum, the State will not support any designation of a focal area that is outside the CHZ unless such designation is informed by a previous management action (e.g., wilderness study area).
  - There are proposed focal areas that do not meet the best-of-the-best designation.
  
- **Merging of the Important Habitat Zone (IHZ) with the General Habitat Zone (GHZ)**
  - The State is concerned about the National Direction's lack of attention to Idaho's three-zone approach, specifically; the direction does not mention the impact of these recommendations on the IHZ.
  - Briefly, and as it relates to infrastructure development, the CHZ is the most restrictive and generally prohibits most new infrastructure development subject to a narrowly tailored exemption process; the IHZ permits new infrastructure development subject to certain criteria, mitigation and best management practices; the GHZ is open without any specific programmatic restriction for sage-grouse unless prohibited by the current RMP.
  - The IHZ has two key roles: provide a "savings account" in the event of a large-scale wildfire in the CHZ and a reasonable pathway for new infrastructure siting.

- If the national direction blurs the distinction between the CHZ/IHZ or IHZ/GHZ or effectively shrinks the amount of habitat in that zone, the adaptive triggers and the overall structure of the Governor’s plan ceases to exist.
- **Additional Requirements for the GHZ**
  - The purpose of the GHZ is to encourage the siting of infrastructure thus avoiding conflict with the key habitat in the other two zones.
  - The Department of Fish and Game estimates that only 5% of Idaho’s sage-grouse population is found within this zone.
  - Adding a “blanket lek buffer” to this zone is inconsistent with the Governor’s plan and the best available science (specifically, the USGS Report only provides a recommendation; and local science should be utilized by land managers).
  - At a minimum and based on the best available science, BLM should reject this recommendation at the programmatic level, and instead apply it where necessary and appropriate at the project-scale.
- **Grazing – The State has some significant concerns with this new approach**
  - “The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within the SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and Land Health Standards and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.”
    - This standard potentially deviates from the Governor’s proposal in several important respects:
      - Lack of detail surrounding the “specific thresholds”
      - No mention of the adaptive management triggers/process.
      - No mention of tying this analysis to the ecological site potential of the allotment.
      - No mention of ensuring that change to a permit must be accompanied by appropriate special and temporal monitoring.
      - “Defined Response” – sets up an “if/then” scenario that does not provide the flexibility to address unique rangeland concerns.
      - Inclusion of language about assessing range improvements (creation of buffers for range improvement should not be done at the programmatic level; will frustrate the ability to find creative solutions to potential grazing issues).

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Friday, June 27, 2014 3:10 PM  
**To:** Lauren Mermejo  
**Subject:** RE: FW: noise restriction

Will do.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Lauren Mermejo [mailto:[lmermejo@blm.gov](mailto:lmermejo@blm.gov)]  
**Sent:** Friday, June 27, 2014 3:08 PM  
**To:** Brent Ralston; Quincy Bahr  
**Cc:** Melvin (Joe) Tague; Dillon, Madelyn -FS; Joan Suther  
**Subject:** RE: FW: noise restriction

Brent – The only suggestion that I would give you for change is your #1. I would use the Utah language “o In PPMA, limit noise from discretionary activities to not exceed 10 decibels above ambient sound levels at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season; support the establishment of ambient baseline noise levels for PPMA habitat area leks.”

The “(Patricelli et al. 2010, Blickley et al. In preparation)” is old science and was updated with new info in 2013. I believe that Quincy’s language reflects that. Quincy – if I am wrong, correct me please!!

Again....thanks!

Lauren

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**From:** Brent Ralston [mailto:[bralston@blm.gov](mailto:bralston@blm.gov)]  
**Sent:** Friday, June 27, 2014 1:53 PM  
**To:** Lauren Mermejo; Quincy Bahr  
**Cc:** Melvin (Joe) Tague; Dillon, Madelyn -FS; Joan Suther  
**Subject:** RE: FW: noise restriction

Lauren,

OK – my oversight. When I saw the Forest Service language I responded with the similar RDF we have incorporated into our plan. Here are all the RDFs for noise that line up with the direction Quincy has reiterated. So we do have all of that direction that we talked about included in our RDF section.

1. Limit noise to less than 10 decibels above ambient measures (20-24 dBA) at sunrise at the perimeter of a lek during active lek season (Patricelli et al. 2010, Blickley et al. In preparation).
2. Require noise shields when drilling during the lek, nesting, brood-rearing, or wintering season.
3. The BLM/Forest Service would work with proponents to limit project related noise where it would be expected to reduce functionality of habitats in Core and Important Management Zones.
4. The BLM/Forest Service would evaluate the potential for limitation of new noise sources on a case-by-case basis as appropriate.
5. Limit noise sources that would be expected to negatively impact populations in Core and Important Management Zones and continue to support the establishment of ambient baseline noise levels for occupied leks in Core Management Zones.
6. As additional research and information emerges, specific new limitations appropriate to the type of projects being considered would be evaluated and appropriate limitations would be implemented where necessary to minimize potential for noise impacts on



Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

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**From:** Lauren Mermejo [mailto:[lmermejo@blm.gov](mailto:lmermejo@blm.gov)]  
**Sent:** Friday, June 27, 2014 11:56 AM  
**To:** Quincy Bahr  
**Cc:** Melvin (Joe) Tague; Brent Ralston; Dillon, Madelyn -FS; [jsuther@blm.gov](mailto:jsuther@blm.gov)  
**Subject:** RE: FW: noise restriction

Thanks for the reminder Quincy!

Brent....there was new science on noise reviewed and as a result of the outcome of the "noise team", we did agree to use the management actions that Quincy has identified below.

Thanks,  
Lauren

**From:** Bahr, Quincy [mailto:[qfbahr@blm.gov](mailto:qfbahr@blm.gov)]  
**Sent:** Friday, June 27, 2014 10:43 AM  
**To:** Lauren Mermejo  
**Cc:** Melvin (Joe) Tague; Brent Ralston; Dillon, Madelyn -FS  
**Subject:** Re: FW: noise restriction

All,

In the Portland FFM meeting I brought up the noise issue that FWS had raised in their comments on the Utah DEIS. All the other Great Basin sub-regions said that nobody brought up this issue on the DEIS. The decision by all the Great Basin managers was to defer the noise issue to the Rocky Mountain region and consider their input.

In the Denver FFM I again brought up the noise issue that FWS had raised on the Utah DEIS. As with the Portland meeting, all the Rocky Mountain sub-regions said that it hadn't been brought up in their efforts. However, WY had gone through extensive discussions with the Governor's office and FWS regarding the noise issue, so the action from all the Rocky Mountain managers was for a small group made up of Rocky Mountain PMs and bios to review the comments and literature related to noise and make recommendations for all the sub-regions to consider and apply.

We did so and provided the conclusions of the literature review and discussions in a summary dated March 7th. That summary was provided to all the Great Basin PMs for review/questions/concerns. It was discussed on one of the weekly PM call (see meeting notes from March 11th). No issues were raised at the time, so the direction was for everyone was to apply it (again, see the meeting notes from March 11th). As of that moment, there should have been consistency across the entire project area for this issue.

I've re-attached the summary notes. I have more detail about the other discussions, if anybody's interested. While we didn't say "use this language" we did provide an example and concluded that folks should add similar language. For example, in Utah, we revised the language slightly and included the following:

- Noise Restrictions:

- In PPMA, limit noise from discretionary activities to not exceed 10 decibels above ambient sound levels at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season; support the establishment of ambient baseline noise levels for PPMA habitat area leks.
- Work with project proponents to limit project related noise in other PPMA habitats and seasons where it would be expected to reduce functionality of habitats that support associated GRSG populations.
- As additional research and information emerges, specific new limitations appropriate to the type of projects being considered would be evaluated and appropriate measures would be implemented where necessary to minimize potential for noise impacts on PPMA GRSG population behavioral cycles.

This addresses both the NTT specific RDF while also addressing the broader issue of potential noise effects in areas other than leks.

Hope this helps.

Q

On Fri, Jun 27, 2014 at 9:09 AM, Lauren Mermejo <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)> wrote:

Hey ya'all:

Here is the FS's noise management action....can you please provide her what each of you are doing in your PP...and cc me as well. Thanks,

Lauren

---

**From:** Dillon, Madelyn -FS [mailto:[mdillon@fs.fed.us](mailto:mdillon@fs.fed.us)]

**Sent:** Friday, June 27, 2014 5:13 AM

**To:** Lauren Mermejo ([lmermejo@blm.gov](mailto:lmermejo@blm.gov))

**Subject:** noise restriction

Hi – Just finishing up a fun week in bustling Bismarck as we kick off our Dakota Prairie Grassland effort. Looking forward to some cooler, drier nights (and days) in CO!

I'm finalizing our draft plan amendment and would like some thoughts about were the BLM landed on the noise issue. Here's our language:

*During breeding, nesting, and brood rearing periods (table 1) from 6:00 pm to 9:00 am noise from new anthropogenic disturbances should be limited to less than 10 decibels above ambient levels of 20-24 decibels measured at sunrise at a distance of 0.6 mile from the perimeter of an occupied lek.*

I'm aware of the "team" efforts to wrestle this issue down and have also had some email convos with Pat, but we'd like to be as similar to the BLM as possible and have some concerns about our ability to implement.

Thanks!

Madelyn Dillon

Forest Service National Greater Sage Grouse Team

Deputy Project Manager

2150A Centre Avenue Suite 300

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970-295-5734 (office)

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Click on image to visit our greater sage-grouse intranet site.



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Quincy Bahr  
Project Manager – Greater Sage-Grouse LUP Amendments, Utah Sub-Region  
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440 West 200 South, Suite 500  
Salt Lake City, UT 84101-1345  
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[qfbahr@blm.gov](mailto:qfbahr@blm.gov)

# Greater Sage-grouse Land Use Plan Amendments

## Conference Call Summary

**PURPOSE:** Discuss Noise Issues for the GRSG planning process and discuss potential stipulations

**DATE AND TIME:** March 7, 2014; 11:30 – 12:30 (MST)

**LOCATION:** Conference Call/Meeting

**ATTENDANCE:**

On the phone:

- Pam Murdock – WY BLM
- Erin Jones – CO BLM
- Jenny Morton – WY BLM
- Quincy Bahr – UT BLM
- Renee Chi – UT BLM

**SUMMARY:**

- It is apparent from the literature that there are effects of noise from development activities on GRSG.
- Some literature experimentally establishes a strong relationship between noise at the lek and lek attendance.
- Some literature describes possible impacts from noise in areas away from the lek, specifically in nesting and early brood-rearing habitat.
- Some general wildlife literature establishes that noise can increase stress at various points in a species' life-cycle. However, there is no known GRSG literature that specifically identifies a relationship between noise in seasonal winter habitat and population impacts.
- In a recent publication, the key researcher for effects of noise on GRSG noted that “we do not yet know whether limiting noise to 10 dB above ambient is appropriate for protecting sage-grouse. However, we recommend continuing to use the 10 dB threshold as an interim measure, combined with appropriate measures of ambient (i.e., 16 to 20 dBA)” (Patricelli et. al. 2013).
- The land use plan amendments/revisions include restrictions/stipulations on land uses and density/disturbance restrictions for core/PPMA (NSO, 1/640, % cap, etc.). These are especially focused around leks and adjacent nesting and early brood-rearing habitats.
- While such restrictions/stipulations do not specifically address noise, they restrict/stipulate the activities generally responsible for noise, and therefore indirectly ameliorate impacts from noise by restricting activities near leks and applying density stipulations in the remainder of core/PPMA. If land uses meet the land use/density and distance restrictions (NSO, 1/640, % cap), there would be protection from the noise-emitting activities.

- Several Wyoming BLM amendments and revisions have general language related to noise. The following is from the preferred alternative for the 9-Plan Amendment DEIS:

The BLM/Forest Service would work with proponents to limit project related noise where it would be expected to reduce functionality of habitats that support core and connectivity habitat area populations.

The BLM/Forest Service would evaluate the potential for limitation of new noise sources on a case-by-case basis as appropriate.

BLM/Forest Service's near-term goal would be to limit noise sources that would be expected to negatively impact core habitat area sage-grouse populations and to continue to support the establishment of ambient baseline noise levels for occupied core habitat area leks.

As additional research and information emerges, specific new limitations appropriate to the type of projects being considered would be evaluated and appropriate limitations would be implemented where necessary to minimize potential for noise impacts on sage-grouse core population behavioral cycles.

As new research is completed, new specific limitations would be coordinated with the WGFD and partners.

Noise levels at the perimeter of the lek should not exceed 10 dBA above ambient noise.

- Additionally, BLM Wyoming and its partners are in the process of developing a more detailed noise mitigation strategy that would be applied during implementation when certain conditions are met. When those conditions are met, the strategy would include requiring modeling the landscape to determine how sound would disperse. A site-specific noise mitigation strategy may also be considered by the applicant that could include a Noise Mitigation Plan.
- In the Utah and Colorado planning efforts, the only language in the DEIS related to sound restrictions is the lek-based stipulations to be applied during the breeding season.
- CO BLM noted that their DEIS does not have any noise language outside the NTT RDF language contained in an appendix. There is concern that adding new restrictions related to noise may not be possible within the range of alternatives considered in the DEIS.
- UT BLM initially was considering adding a requirement for noise modeling and, if needed at the site-specific level, a noise mitigation plan. However, they share concerns related to adding new requirements/restrictions that were not analyzed in the Draft EIS, were not identified during scoping, or raised by the FWS or other internal partners during administrative reviews of the DEIS.

#### **Conclusion:**

- Given the lack of specificity in existing literature combined with the existence of stipulations on activities that result in noise issues, the team concluded that adding language similar to that in the WY 9-Plan would address the issue in the RMP, while setting the stage to address it at the site-specific level as needed.

**Meredith Zaccherio**

---

**From:** Ehfñ#Mrqdwkdq#P qp ehfnC eø tj ryA  
**Sent:** Wxhvvd | #/hswp ehu# #5348#4-56#D P  
**To:** G bqh#P fFrqgd:xjkh | #P hñg lk# dffkhuñr  
**Subject:** Iz g-#huu | #Shdn#Z lghuqhvw#Duhd

Meredith, we solved the Jerry Peak wilderness issue. The ARMPA is ready to format. Please include this email set in the project record. Jon

----- Forwarded message -----

From: **Stephanie Carman** <[scarman@blm.gov](mailto:scarman@blm.gov)>  
Date: Tue, Sep 1, 2015 at 11:20 AM  
Subject: Re: Jerry Peak Wilderness Area  
To: "Beck, Jonathan" <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>  
Cc: "Magaletti, Matthew" <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)>

Good with me, thanks!

Stephanie Carman  
Mobile 202 380 7421

Sent from my iPhone

On Sep 1, 2015, at 1:08 PM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:

I will tell EMPSI to move forward with formatting the ARMPA if we have finished this discussion. [REDACTED]

[REDACTED] Jon

On Tue, Sep 1, 2015 at 10:28 AM, Magaletti, Matthew <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)> wrote:  
Im good as well. Thanks Jon.

Steph - I think the language as we have it in the draft ROD is good to go based on the information Jon has provided.

On Tue, Sep 1, 2015 at 12:09 PM, Aaron Moody <[aaron.moody@sol.doi.gov](mailto:aaron.moody@sol.doi.gov)> wrote:

[REDACTED]  
Sent from my iPad

On Sep 1, 2015, at 12:04 PM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:

[REDACTED]

On Tue, Sep 1, 2015 at 10:02 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

[Redacted]

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Tue, Sep 1, 2015 at 11:58 AM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:

[Redacted]

On Tue, Sep 1, 2015 at 9:45 AM, Moody, Aaron <[aaron.moody@sol.doi.gov](mailto:aaron.moody@sol.doi.gov)> wrote:

[Redacted]

Thanks!

Aaron G. Moody  
Assistant Solicitor, Branch of Public Lands  
Division of Land and Water Resources  
Office of the Solicitor  
U.S. Department of the Interior  
202-208-3495

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On Tue, Sep 1, 2015 at 11:00 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

  
**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Tue, Sep 1, 2015 at 10:59 AM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
PIG and SFA management actions are applied to habitat regardless of designation. We didn't carve out or exempt wilderness areas or WSAs from HMA designation. So, if an area is released from WSA it is still a designated habitat management area and the protections would apply. In the IDswMT plan, habitat was designated in wilderness areas and WSAs. Obviously, the wilderness restrictions would trump any lesser PIG or SFA restrictions.

On Tue, Sep 1, 2015 at 8:53 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:  
Maybe we need a call - do the Proposed plans afford the measures of PIG to these lands currently? Or does the WSA management apply?

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Tue, Sep 1, 2015 at 10:51 AM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
True, but the protections we included in the management actions for PIG are more than adequate to protect the bird and don't think an updated effects analysis will change the effects to GRSG. Jon

On Mon, Aug 31, 2015 at 3:23 PM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:  
But weren't the areas previously managed as WSAs, and now, would be managed as PIG, so that would be changing?

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Mon, Aug 31, 2015 at 3:47 PM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
Correct. The habitat stays habitat regardless of whether it is wilderness, WSA, or released. Management will be more restrictive in the new wilderness areas



because of the law. The management for the acres of PIG will that were released will be managed as PIG. This will protect the habitat. I think we can make the statement in the ROD about plan maintenance and will not need to add anything at this time. Jon

On Mon, Aug 31, 2015 at 1:29 PM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Thanks so much Jon. To confirm: the management of the 12,430 acres will not change concerning the GRSG plans now that it is a wilderness? And the X, X, X PIG will not change either. The management in the PRMPA will stand. Do you think you need to make any changes to the Plan to address the enacted bill?

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Mon, Aug 31, 2015 at 2:27 PM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
We did not exclude wilderness from planning decisions if they were habitat. We displayed the most restrictive management that a WSA or a wilderness would apply to the land but they area still shown as PIG or SFA. The reason we should not exclude the new wilderness areas is because there are management actions that apply to PIG and SFA that are not covered by the wilderness designation. For example, we graze in wilderness and the management actions associated with grazing in PIG and SFA would apply to grazing management in the wilderness area.

The released WSA are still habitat and designated as PIG and SFA so I think they will conserve GRSG habitat. I updated the numbers in the attached. Jon

On Mon, Aug 31, 2015 at 10:09 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Attached are the paragraphs we currently have in the ROD. Today, please, we need you to confirm the acreages as well as confirm that the highlighted statements are correct. In particular, we need to know:

- when you crafted the plan, did you exclude wilderness? Should the new wilderness also be excluded? Does the plan include anything about this?
- What is the management direction is for the WSAs which have been released. How are they managed and how will it change based on the release?
- please check the acres throughout.

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator

office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Fri, Aug 28, 2015 at 11:47 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Here are the maps which the BLM-ID prepared for the legislation - I'm guessing the shapefiles existing somewhere there?  
Unfortunately, I doesn't look like the overlaps with GRSG habitat was included in our briefing materials. But we need it now.  
Many thanks for your work on this.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Fri, Aug 28, 2015 at 10:30 AM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
Diane, I am tracking down the shapefiles used for the maps. Jon

On Fri, Aug 28, 2015 at 8:25 AM, McConnaughey, Diane <[dmcconnaughey@blm.gov](mailto:dmcconnaughey@blm.gov)> wrote:  
I do not have an official Wilderness boundary, so do not know where to split Jerry Peak. I will contact the FO for this, but is it documented what feature splits Jerry Peak into wilderness designation ?

Diane McConnaughey  
GIS Analyst  
BLM, Idaho State Office  
1387 S. Vinnell Way  
Boise, ID 83709  
voice 208-373-3967  
email [dmcconnaughey@blm.gov](mailto:dmcconnaughey@blm.gov)

On Fri, Aug 28, 2015 at 7:48 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:  
BLM likely created all of the maps - and the ID state office would have been the one to do that, with the assistance of WO-Leg Affairs. Please check with your PIO. I'm reaching out to Leg Affairs.  
We will need the acreage updates ASAP, as we will need to amend the proposed withdrawal segregation as well as all of the GRSG ID Plan and ROD.

Many thanks

**Stephanie Carman**

Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

On Fri, Aug 28, 2015 at 9:35 AM, Magaletti, Matthew <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)> wrote:

Hi Diane - thanks again for all your help with this. The map helps tremendously. If you could create the map depicting the conveyances in BLM-administered SFA, PHMA, IHMA, and GHMA - that would be very helpful. For the map that you already built, can you modify the SFA, PHMA, IHMA, and GHMA to show only BLM-administered lands? Do also think we can get the acre estimates (let me know if this is a lot to ask for).

Jon - we are working on crafting some language for the ROD that states how the law impacts the decision area for the ARMPA. For example, X amount of acres of SFA will be conveyed to county/city X.

Thanks!

On Thu, Aug 27, 2015 at 5:55 PM, McConnaughey, Diane <[dmcconnaughey@blm.gov](mailto:dmcconnaughey@blm.gov)> wrote:

I do not have an official boundary for the wilderness area, and was "eyeballing" a map in the newspaper. Part of Jerry Peak is in the Wilderness. From the bill it sounds like the part not in wilderness as well as the ones listed below are will no longer be managed as WSA. When I pulled the conveyance maps cited in the bill (googled ) it seemed as if there was a small amount of SFA in one conveyance and a small amount of GHMA in another. I am working on a map that shows the WSAs, habitat, SFA, Habitat Management Areas in the area of the new wilderness. If it would help, I can make maps of the conveyances with Habitat and SFA

Conveyance maps are here <http://simpson.house.gov/ciedra/transfers.htm> . I think BLM made maps affecting BLM managed lands and the FS made maps affecting USFS

Quick map attached of area of interest with Habitat and SFA. I can clean the map up, add other features, as well as make the maps of conveyances with habitat and SFA <https://www.congress.gov/bill/114th-congress/house-bill/1138>

b) Public Land.--

(1) Finding.--Congress finds that, for purposes of section 603 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782), the public land administered by the Bureau of Land Management in the following wilderness study areas have been adequately studied for wilderness designation:

(A) Jerry Peak Wilderness Study Area.

[[Page 129 STAT. 481]]

(B) Jerry Peak West Wilderness Study Area.

(C) Corral-Horse Basin Wilderness Study Area.  
(D) Boulder Creek Wilderness Study Area.  
(2) Release.--Any public land within the areas described in paragraph (1) that is not designated as wilderness by this title--  
(A) shall not be subject to section 603(c) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782(c)); and  
(B) shall be managed in accordance with land management plans adopted under section 202 of that Act (43 U.S.C. 1712).

Diane McConnaughey  
GIS Analyst  
BLM, Idaho State Office  
1387 S. Vinnell Way  
Boise, ID 83709  
voice 208-373-3967  
email [dmconnaughey@blm.gov](mailto:dmconnaughey@blm.gov)

On Thu, Aug 27, 2015 at 2:33 PM, Magaletti, Matthew <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)> wrote:  
Thank you to you both! Sorry for the last minute request.

On Thu, Aug 27, 2015 at 4:30 PM, Beck, Jonathan <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)> wrote:  
They are within the decision space of the ARMPA, Diane has been looking at this and get you specifics May take a little time. Jon

On Thu, Aug 27, 2015 at 1:30 PM, Magaletti, Matthew <[mmagalet@blm.gov](mailto:mmagalet@blm.gov)> wrote:  
Hi Jon,

Sorry to keep bugging you today, but I was just asked to plug something into the ROD noting that the designation of the Jerry Peak Wilderness, release of the WSAs, and the land conveyances from HR 1138 do not impact our decision to approve the IDswMT ARMPA. Do you happen to know if the the new wilderness, former WSAs, and the area for conveyance are within the decision space for the ARMPA? I cannot find maps associated with this law anywhere.

Thanks,  
--

**Matthew Magaletti**  
Planning and Environmental Analyst  
Bureau of Land Management, WO-210  
(202) 912-7085

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Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

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**Meredith Zaccherio**

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**From:** Ehfñ#Mrqdwkdq#P ñp ehfnC eø Ìj ryA  
**Sent:** Z hgqhvgd | #/hswhp ehñ# #5348#9=47#D P  
**To:** P hñg Ìk# dffkhuñr  
**Subject:** Iz g=#U IV#g dwd#lqg#UUVJ #p dsv

Please add to the project record. Jon

----- Forwarded message -----

From: **McConnaughey, Diane** <[dmconnaughey@blm.gov](mailto:dmconnaughey@blm.gov)>  
Date: Tue, Sep 8, 2015 at 4:30 PM  
Subject: Re: GIS data and GRSG maps  
To: "Makela, Paul" <[pmakela@blm.gov](mailto:pmakela@blm.gov)>  
Cc: Anthony Titolo <[atitolo@blm.gov](mailto:atitolo@blm.gov)>, Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, "Quamen, Frank R" <[fquamen@blm.gov](mailto:fquamen@blm.gov)>

Anthony is correct. Not having National edgematched boundaries to start with are causing the gaps and even overlaps in compiled data we see now. The acres are not large, but gaps could be problematic if the area is depicted as non-habitat when it is habitat or maybe SFA as well, and a "project" includes area in the "gap". The largest gap affecting Idaho is the one between Idaho and Nevada, but there is also small ones between Idaho and Oregon. If the "gaps" are fixed/cleaned-up, would it require that states edit local data to match ?

The EIS boundary Idaho used was provided by the NOC, with minor editing top remove areas in Nevada that were identified as being part of Nevada's EIS and adding the Raft River Unit in Utah. The Idaho GRSG habitat and SFA layers seem to match  
\\DP1V\_Default.sde\IDP1V.IDSD1.CAD\_NOC\_NSDICadastralReference\IDP1V.IDSD1.BDY\_WesternStates  
Boundaries\_PUB\_GCDB\_POLY

Diane McConnaughey  
GIS Analyst  
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email [dmconnaughey@blm.gov](mailto:dmconnaughey@blm.gov)

On Tue, Sep 8, 2015 at 3:04 PM, Makela, Paul <[pmakela@blm.gov](mailto:pmakela@blm.gov)> wrote:  
The issue is not with the Idaho habitat/sfa data itself--the data we are using is the data we sent up the line to you folks. The issue appears to be with the state boundaries. As I mentioned our data fit the Idaho boundary we routinely use; but the slivers appear when we look at the national habitat/ sfa data, which I assume must be using a different state boundary dataset. I'll let Diane wade in...

Diane?

Paul



Paul Makela  
Wildlife Program Lead  
Idaho BLM State Office  
Branch of Resources and Science  
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Office (208) 373-3809  
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[pmakela@blm.gov](mailto:pmakela@blm.gov)

On Tue, Sep 8, 2015 at 2:53 PM, Anthony Titolo <[atitolo@blm.gov](mailto:atitolo@blm.gov)> wrote:

Hi Paul,

The gaps are due to the EIS boundaries (in general) and a known issue with NV's habitat mapping effort that introduced a gap along the northern border (habitat was not mapped there). The slivers and gaps you see are the direct result of not having national level planning boundaries with matched edges and each state/EIS delineating habitat on their own. Cleaning them up would likely take a combination of your ideas...particularly with how to address projects crossing these EIS boundaries.

I am, however, concerned about your reference to Idaho's habitat and SFA data being OK. These national level data are simply a compilation of what was provided by each EIS...in other words, they should be the "state scale" datasets. Do you have a different habitat delineation dataset from what was provided to the NOC?

If so, we really should get this sorted out ASAP. If not and you view the EIS boundary data (also provided by each EIS in coordination with the Planning shop) along with the habitat, I suspect the vast majority are due to gaps in the boundary (NV being the exception).

Anthony Titolo

Natural Resources Assessment Project Manager

BLM National Operations Center

Denver Federal Center, Building 40

303-236-0446

**From:** Makela, Paul [mailto:[pmakela@blm.gov](mailto:pmakela@blm.gov)]  
**Sent:** Tuesday, September 08, 2015 2:32 PM  
**To:** Anthony Titolo  
**Cc:** Jonathan Beck; Brent Ralston; Diane McConnaughey  
**Subject:** GIS data and GRSG maps

Hi Anthony

We've noticed on the national GIS layers for GRS habitat (PHMA, GHMA) and SFAs, there are some slivers of 500 m to 1 km or so, between ID and UT, ID and NV, ID and OR and OR, NV.

Are there plans to clean these up? When we use the state scale data (e.g., Idaho's habitat and SFA data, along with the state boundary we use in GIS), the boundaries are clean, without slivers at the state line. So for local project implementation we're fine.

Wondering if the slivers in the national data set are going to be problematic? Options appear to be to 1) dissolve the slivers into the surrounding matrix on each state's side of the line, or 2) a directive that says something to that effect for dealing with small slivers. Thoughts?

Paul

Paul Makela

Wildlife Program Lead

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--

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Bureau of Land Management  
Idaho State Office  
208-373-4070



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Corrected GRSG Resolved Issues Document\_v2

1 message

Hildner, Michael &lt;mhildner@blm.gov&gt;

Tue, Feb 3, 2015 at 1:04 PM

To: Jonathan Beck <jmbeck@blm.gov>, Johanna Munson <jmunson@blm.gov>, Brent Ralston <bralston@blm.gov>, Jeffery Foss <jfoss@blm.gov>, Timothy Murphy <tmurphy@blm.gov>  
Cc: Edwin Roberson <eroberso@blm.gov>, Glen Stein <gstein@fs.fed.us>, "Dillon, Madelyn -FS" <mdillon@fs.fed.us>, Stephanie Carman <scarman@blm.gov>, Frank Quamen <fqumen@blm.gov>

Hi BLM-ID,

In coordinating with FS, we noticed that the GRSG guidance document you received was missing one piece of direction. I have added the following bullet point to your SFA guidance :

"· Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)—these areas will be treated as PHMA, with the SFA management actions for this FS-land."

I've also attached a map that specifically identifies these two areas for your reference (please ignore all the other identified areas on the map with regard to the above bullet point).

I have reattached the guidance for purposes of version control, but this is the only change you will see in it. Sorry about the oversight, and thanks a lot as always. Let me know if you have any questions.

—

Michael Hildner  
Planning and Environmental Analyst  
BLM Washington Office  
202-912-7231  
[mhildner@blm.gov](mailto:mhildner@blm.gov)

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### 2 attachments


SMA\_of\_NonHab\_On\_BLM\_Surf\_Sub\_NCID\_Named.pdf  
396K

Issues Resolved\_ID 2.3.15 final.docx  
229K

# Surface Management Agency of Non ADPP Habitat on BLM Surface/ Subsurface Management within DRAFT FWS Areas of Significance/Sagebrush Focal Areas

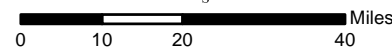
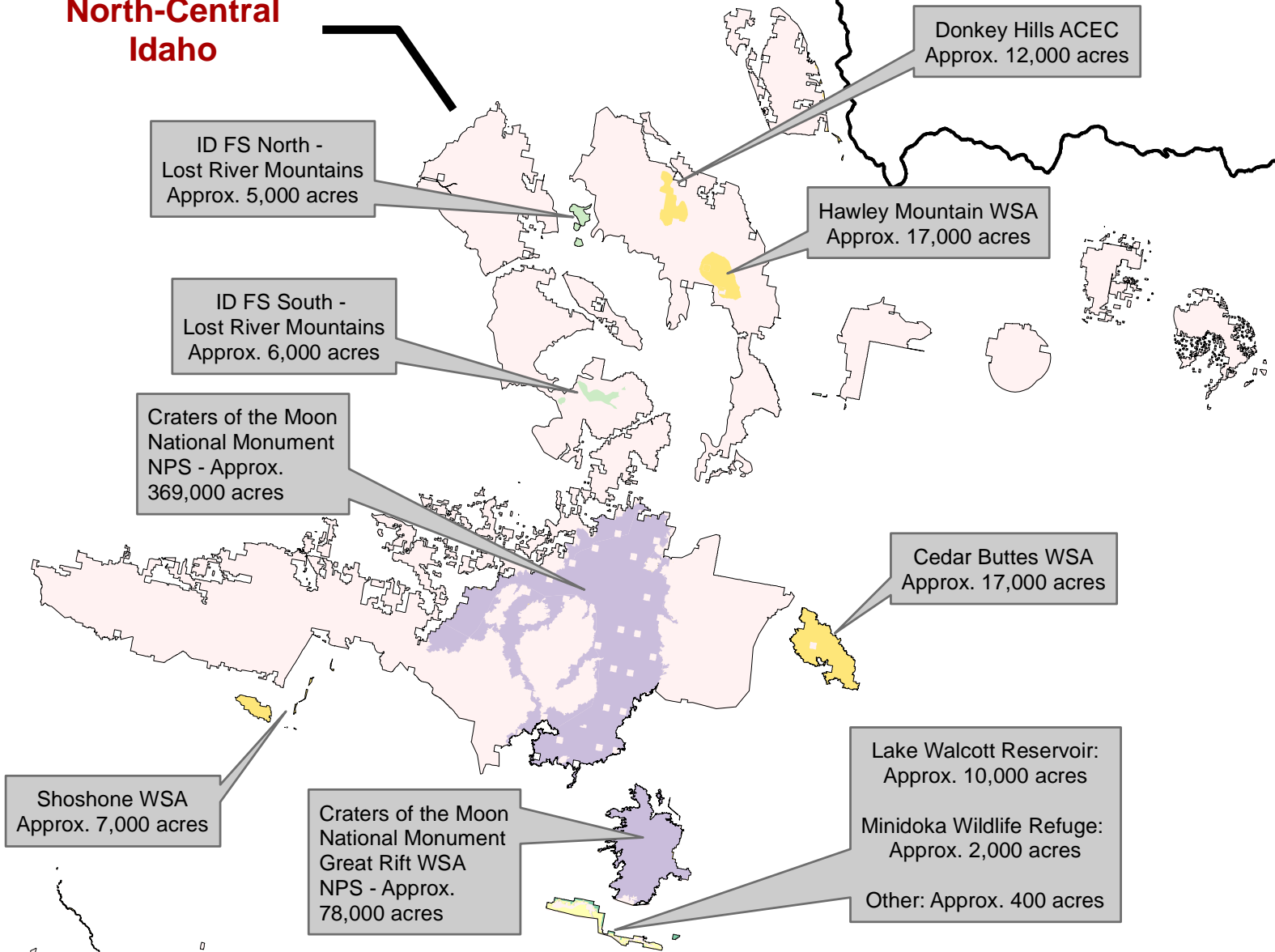
## - North Central Idaho

### Legend

-  FWS Areas of Significance / Sagebrush Focal Areas
- Surface Management Agency**
-  Non-Habitat, Bureau of Land Management
-  Non-Habitat, US Fish and Wildlife Service
-  Non-Habitat, Forest Service
-  Non-Habitat, National Park Service
-  Non-Habitat, Bureau of Reclamation
-  Non-Habitat, State
-  Non-Habitat, Private
-  Non-Habitat, Other/Undetermined
-  ADPP Habitat or Non-Habitat Outside of BLM Surface/ Subsurface Management

**Data Sources:**  
**Subsurface Estate:** Acquired from BLM WY State Office for MT/ND/SD, WY, CO, UT, and Southern ID in August 2014. \*Only surface estate is used for classification in NV, OR and CA.  
**Surface Management Agency:** Downloaded from BLM Geocommunicator on December 13th, 2013 verified as current on March 6th, 2014.  
**BLM Administrative Draft Proposed Plan Habitat Category Data:** Submitted by individual BLM EISs between March 5th, 2014 and December 2nd, 2014.  
**FWS Areas of Significance:** Data provided by FWS, accompanying Memorandum FWS/AES/058711 (10/27/2014).

## North-Central Idaho



***BLM-IDAHO***

**Greater Sage-Grouse Planning Issues for the BLM Planning Teams to Insert and Analyze in Administrative Draft Proposed Plan (ADPP)**

**January 30, 2015**

*The March 4, 2010 decision by the U.S. Fish and Wildlife Service that the greater sage-grouse warranted listing but was precluded [Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to list the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered] set in motion the most comprehensive land-use planning initiative in the BLM's history.*

*In 2011, the BLM began updating land-use plans across the West so as to ensure not only the long-term viability of the greater sage-grouse on public lands and the continued economic vitality of the West. This has been a complex and demanding process involving collaboration with an unprecedented number of stakeholders, including Governors, State Fish and Game agencies, the U.S. Fish and Wildlife Service and many others. The BLM's mandate of multiple use and sustained yield has required us to balance the full range of resource uses on public lands, including the conservation of crucial wildlife habitat. As we have worked through this process, public land managers throughout the BLM have made difficult resource management decisions.*

*These documents provide key guidance that will enable the BLM to finalize land use plans that will contribute to the conservation of the Greater Sage-Grouse and other sagebrush associated species across the West. The guidance outlines a suite of tools, such as disturbance limits in key habitats and mitigation approaches, which will help us to reach this goal. These mechanisms will work in concert to conserve sage-grouse habitat so that we can achieve our twin goals of thriving Greater Sage-Grouse populations and robust Western economies.*

***Issue:***

**Development in Highly Important Landscapes**

***Direction:***

As more specifically provided in this guidance, the ADPP will include Sagebrush Focal Areas (SFA), consisting of the BLM and FS-managed lands within the area depicted in the October 27, 2014 USFWS memo, *Greater Sage-Grouse: Additional Recommendation to Refine Land Use Allocations in Highly Important Landscapes*. In the Special Status Species Section of Chapter 2, include the following management action drop in language (for the Proposed Plan only):

*“Designate Sagebrush Focal Areas (SFA) as shown on Map X (x acres). SFAs will be managed as PHMA, with the following additional management:*

- 1) Recommended for withdrawal from the General Mining Act of 1872, subject to valid existing rights.*
- 2) Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.*

- 3) *Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."*

**The NOC will provide updated shapefiles that delineate the SFAs.**

Except as otherwise provided below, the ADPP will provide that all BLM- and FS-managed lands (including subsurface) within SFAs will be allocated and managed as PHMA and include the management actions above.

- *Do Not Include the following in SFA Management*
  - Hawley Mountain WSA (ID), Shoshone WSA (ID), Cedar Buttes WSA (ID), Lower Salmon Falls Creek (ID), Little Jack Wilderness (ID), Bruneau-Jarbidge Wilderness (ID) in non-habitat – The current management in these areas is generally protective of GRSG. As applicable, these will continue to be managed so as not to impair their suitability for preservation as wilderness, or under the terms of the Wilderness Act to preserve wilderness character.
    - To the extent that these areas were analyzed for contingent management as general or priority habitat, the ADPP will include contingent allocations and management direction that would apply in the event that Congress releases the areas from WSA status
  - Non-habitat areas outside Little Jack and Bruneau-Jarbidge Wilderness and Salmon Falls Creek ACEC which were previously shown within the SFA –These areas will not be managed as PHMA or SFA.
- Do Include Forest Service Lost River Mountains North (~5,000 acres) Area and South Area (~6,000 acres)– these areas will be treated as PHMA, with the SFA management actions for this FS-land.
- Do Include Donkey Hills ACEC –In order to consolidate parcels for protection as SFAs, this area will be treated as PHMA and included for SFA management.
- *Do Not Include Other Agency Land in SFA Management* – while lands managed by other agencies will be shown on the SFA maps, BLM ADPP decisions will not be applied to them.
- *Do Not Include Private/State Lands in SFA Management* – while private lands may be within the SFA boundaries, ADPP decisions will not be applied to them, but may apply to Federal subsurface underlying such lands as provided below.
- *Subsurface Estate:*
  - Under private/state lands: subsurface estate in PHMA and GHMA should be treated as PHMA with SFA management actions.

- Under other Federal lands: subsurface state should be treated as PHMA with SFA management actions if it is not already withdrawn (such as in Refuges or Parks) and PHMA or GHMA management was analyzed in the DEIS.

Additional direction/drop in language for the ADPPs on SFAs will be forthcoming.

**Issue:**

**Direction:**

**Mitigation**

The ADPP will include the updated Mitigation Framework (Attachment I) and drop-in Chapter 2 language to reflect the following language:

*“In all sage-grouse habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”*

**Issue:**

**Direction:**

**Mapping**

Not Applicable

**Issue:**

**Direction:**

**Disturbance**

Per the original April 2014 NPT guidance on disturbance, the ADPP will use the 3% disturbance cap at the Biologically Significant Unit (BSU) and project scale. The density calculation (an average of 1 facility per 640 acres) applies to energy and mining facilities. The disturbance cap will not be applied to foreclose development of locatable minerals on unpatented claims located under the 1872 Mining Law; the disturbance from locatable mining will be accounted for in determining the percent disturbance and whether the cap has been exceeded. BLM-ID will use the disturbance calculation methodology developed prior to this guidance (see Attachment II).

Planning units will include the following land use plan actions within their ADPPs that states:

- a. If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid*



*existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*

- b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

**Issue:**

**Direction:**

**Vegetation Objectives**

The ADPP will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

**Issue:**

**Direction:**

**Livestock Grazing**

The following management actions will be included in the Livestock Grazing section of the ADPP.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas,*

*including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*

- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Attachment III provides guidance as to how the BLM will incorporate GRGS decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

***Issue:***

***Direction:***

**Mineral Materials (Salable Minerals)**

All Priority Habitat Management Areas will be closed to mineral materials development. All Important Habitat Management Areas and General Habitat Management Areas will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria.

***Issue:***

***Direction:***

**High-voltage Transmission and Major Pipeline ROWs and Corridors**

1) Apply the recommended NPT allocation guidance for PHMA of avoidance.

2) GHMA will remain open. BLM-ID will employ a location and design process to ensure protection.

3) For sub-regions that have planned priority transmission lines that traverse their planning area (Gateway West, Boardman to Hemingway, and TransWest Express, including those portions of Gateway South that

are co-located), apply the following language as a management action in their ADPP:

*“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in [insert citation here] of this document. The BLM is currently processing an application for [Insert name of transmission project] and the NEPA review for this project is well underway. The BLM is analyzing GRSG mitigation measures through the project’s NEPA review process, which will include analysis of the following conservations measures.”*

**Issue:** Coal Suitability  
**Direction:** Not Applicable in Idaho

**Issue:** Fluid Mineral Resources (Including Geothermal)  
**Direction:** All ADPPs will include the following as a conservation objective:

*“Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA and GHMA, and subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 U.S.C. 226(p) and 43 C.F.R. 3162.3-1(h).”*

*“Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, reduce and mitigate adverse impacts to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD for the lease to avoid and minimize impacts to sage-grouse or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.”*

**Issue:** No Surface Occupancy (NSO) Exception Language  
**Direction:** Follow NPT guidance for Priority Habitat Management Areas. No-surface-occupancy stipulations will be included in new fluid mineral

leases at the time of leasing only and may not be applied to existing fluid mineral leases that did not include no-surface-occupancy stipulation at the time of leasing. Include the following language into the ADPP:

*“No waivers or modifications to a fluid mineral lease no-surface-occupancy stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease no-surface-occupancy stipulation only where the proposed action:*

- (i) Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,*
- (ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.*

*Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP [revision or amendment]. Exceptions based on conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action’s impacts.*

*Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.”*

**Issue:**

**Direction:**

**Adaptive Management**

Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and FWS experts.

When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation Team will convene to determine the causal factor, put project level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response. Adoption of any further actions at the plan level may require initiating a plan amendment process.

***Issue:***

***Direction:***

**Application of Lek Buffers**

The ADPP will require the use of lek buffer-distances for all new BLM-managed and BLM-authorized anthropogenic disturbances in both GHMA and PHMA (see Attachment IV) through this drop-in Chapter 2 language:

*“In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review ([Open File Report 2014-1239](#)) in accordance with Appendix X.”*

Allocation Direction

\*Southwest Montana will follow the allocations designated for the MT ADPP

	<i>Idaho/SW MT*</i>
<b>Solar - Priority</b>	Exclusion <i>Imp - Avoid</i>
<b>Solar – General</b>	Open
<b>Wind – Priority</b>	Exclusion <i>Imp – Avoid</i>
<b>Wind – General</b>	Open <i>Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - Priority</b>	Avoidance <i>Imp - Avoid Screening process</i>
<b>HV Transmission Lines and Large Pipeline ROWs - General</b>	Open
<b>Minor ROWs – Priority</b>	Avoidance <i>Imp - Avoid</i>
<b>Minor ROWs – General</b>	Open
<b>Fluids – Priority</b>	NSO <i>Imp - NSO</i>
<b>Fluids – General</b>	Open with Moderate constraints
<b>Non-energy Leasables - Priority</b>	Closed <i>Imp - Open</i>
<b>Non-energy Leasables - General</b>	Open
<b>Mineral Materials – Priority</b>	Closed <i>Imp - Open</i>
<b>Mineral Materials – General</b>	Open

## Attachment I

# GREATER SAGE-GROUSE RMPA/FEIS TEMPLATE LANGUAGE FOR ADDRESSING MITIGATION

[ ] = Instructions

[ ] = Fill in the blank

[This mitigation language addresses greater sage-grouse. However, if you are working on a plan revision, you may need to add additional language to be more inclusive of other resource and value objectives (e.g. cultural resources, national historic trails, recreation values, other special status species) that may need to be mitigated.]

## Chapter 1 - Introduction

[Nothing new to add to EIS]

## Chapter 2 – Alternatives – [Proposed Plan/Proposed Plan Amendment]

- Add these two new sections (below) to the **Chapter 2 Alternatives** section.
- Replace the Regional Mitigation placeholder language that was included in the draft EIS with the new “Mitigation” section, below.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

Consistent with the proposed plan’s goal outlined in [Table 2-X – Description of Alternatives], the intent of the [Proposed Plan/Proposed Plan Amendment] is to provide a net conservation gain to the species. To do so, in undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. This is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states “to initiate protective conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA.”

## Mitigation

*Mitigation Standards.* In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see the concepts of durability, timeliness, and additionality as described further in Appendix X).

*Greater Sage-Grouse Conservation Team.* The BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. This Team will develop a WAFWA Management Zone Regional Mitigation Strategy (hereafter, Regional Mitigation Strategy). The Team will also compile and report on monitoring data (including data on habitat condition, population trends, and mitigation effectiveness) from States across the WAFWA Management Zone (see Monitoring section). Subsequently, the Team will use these data to either modify the appropriate Regional Mitigation Strategy or recommend adaptive management actions (see Adaptive Management section).

The BLM/USFS will invite governmental and Tribal partners to participate in this Team, including the State Wildlife Agency and U.S. Fish and Wildlife Service, in compliance with the exemptions provided for committees defined in the Federal Advisory Committee Act and the regulations that implement that act. The BLM/USFS will strive for a collaborative and unified approach between Federal agencies (e.g. FWS, BLM, and USFS), Tribal governments, state and local government(s), and other stakeholders for greater sage-grouse conservation. The Team will provide advice, and will not make any decisions that impact Federal lands. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

*Developing a Regional Mitigation Strategy.* The Team will develop a Regional Mitigation Strategy to inform the mitigation components of NEPA analyses for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy will be developed within one year of the issuance of the Record of Decision. The BLM's Regional Mitigation Manual MS-1794 will serve as a framework for developing the Regional Mitigation Strategy. The Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the WAFWA Management Zone's boundaries.

Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can provide a net conservation gain to the species. The Regional Mitigation Strategy developed by the Team will elaborate on the components identified above (i.e.



avoidance, minimization, and compensation; additionality, timeliness, and durability) and further explained in Appendix [X].

In the time period before the Strategy is developed, BLM will consider regional conditions, trends, and sites, to the greatest extent possible, when applying the mitigation hierarchy and will ensure that mitigation is consistent with the standards set forth in the first paragraph of this section.

*Incorporating the Regional Mitigation Strategy into NEPA Analyses.* The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

*Implementing a Compensatory Mitigation Program.* Consistent with the principles identified above, the BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be implemented at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Chapter 3 – Affected Environment**

[Nothing to add]

### **Chapter 4 – Environmental Consequences – [Proposed Plan/Proposed Plan Amendment]**

#### **Mitigation**

This Chapter describes the environmental consequences associated with the impacts to greater sage-grouse and its habitat from activities carried out in conformance with this plan, in addition to BLM/USFS management actions. In undertaking BLM/USFS management actions, and consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and

compensating for impacts by applying beneficial mitigation actions. In addition, to help implement this [Proposed Plan / Proposed Plan Amendment], a WAFWA Management Zone Regional Mitigation Strategy (per Appendix [X]) will be developed within one year of the issuance of the Record of Decision. The Strategy will elaborate on the components identified in Chapter 2 (avoidance, minimization, compensation, additionality, timeliness, and durability), and will be considered by the BLM/USFS for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The implementation of a Regional Mitigation Strategy will benefit greater sage-grouse, the public, and land-users by providing a reduction in threats, increased public transparency and confidence, and a predictable permit process for land-use authorization applicants.

### Appendix [X]

- Add this new Appendix.
- Ensure a degree of consistency between this nationally standardized language and that found in the rest of the EIS.
- Fine tune this language, if necessary, but maintain consistency with the other BLM/USFS plan amendments.
- Remove references to USFS for plans that do not address US Forest Service lands

### Appendix (X) – Mitigation – [Proposed Plan/Proposed Plan Amendment]

#### General

In undertaking BLM/USFS management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM/USFS will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts from BLM/USFS management actions and authorized third party actions that result in habitat loss and degradation remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to provide a net conservation gain to the species. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy for BLM/USFS management actions and third party actions that result in habitat loss and degradation. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance
  - Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
  - Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects, including accounting for any uncertainty associated with the effectiveness of the projects.

- This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
- For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure (e.g. uncertainty associated with effectiveness) may require an upward adjustment of the valuation.
- The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
- Compensatory Mitigation Options
  - Options for implementing compensatory mitigation should be identified, such as:
    - Utilizing certified mitigation/conservation bank or credit exchanges.
    - Contributing to an existing mitigation/conservation fund.
    - Authorized-user conducted mitigation projects.
  - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
- Compensatory Mitigation Siting
  - Sites should be in areas that have the potential to yield a net conservation gain to the greater sage-grouse, regardless of land ownership.
  - Sites should be durable (see glossary).
  - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be considered, if those sites have the potential to yield a net conservation gain to greater sage-grouse and are durable.
- Compensatory Mitigation Project Types and Costs
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- Compensatory Mitigation Compliance and Monitoring
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.

- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into NEPA Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for BLM/USFS management actions and third party actions that result in habitat loss and degradation and the appropriate mitigation actions will be carried forward into the decision.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to provide a net conservation gain to the species, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

### **Glossary Terms**

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (adopted and modified from BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** The [restoration](#), [creation](#), [enhancement](#), and/or [preservation](#) of impacted resources (adopted and modified from 33 CFR 332), such as on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements). (adopted and modified from BLM Manual Section 1794).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur. (adopted and modified from BLM Manual Section 1794).

**Durability (protective and ecological):** the maintenance of the effectiveness of a mitigation site and project for the duration of the associated impacts, which includes resource, administrative/legal, and financial considerations. (adopted and modified from BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The lack of a time lag between impacts and the achievement of compensatory mitigation goals and objectives (BLM Manual Section 1794).

## Attachment II

### **Greater Sage-Grouse (GRSG) Land Use Plans Disturbance Caps Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use of locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER analysis in the land use plans (Chapter 2, Affected Environment) and the use of the “west-wide” sagebrush availability and habitat degradation data/estimates for the Priority Habitat Management Areas in each population for monitoring and management purposes as the LUPs are being implemented.
- VII. Provide guidance on what is considered in the disturbance calculations versus what is considered for the disturbance cap.

#### **Guidance**

- I. Planning units will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. *If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.) will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.*
  - b. *If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area in a Priority Habitat Management Areas, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain*

*the area under the cap (subject to applicable laws and regulations, such as the 1872 hard rock mining law, valid existing rights, etc.).*

- II. Use of west-wide habitat degradation data as well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use the west-wide data at a minimum and/or locally collected disturbance data as available (e.g., DDCT) for the anthropogenic disturbance types listed in Table 1.
  
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 7 additional features that are considered threats to sage-grouse (Table 2). Using 1 meter resolution NAIP imagery is recommended. Use local data if available.
  
- IV. Fire-burned and habitat treatment areas will not be included in the project scale degradation disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
  
- V. Planning units are directed to use a density cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is on average less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than an average of 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area (*subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.*).
  - Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments)



- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the Affected Environment section of the proposed plans/ FEISs. West-wide sagebrush availability and habitat degradation data layers will be used for the Priority Habitat Management Areas in each population for monitoring (see the GRSG Monitoring Framework in the Monitoring Appendix of the EIS) and management purposes as the LUPs are being implemented. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.
- VII. Planning units are directed to use the three measures (sagebrush availability, habitat degradation, density of energy and mining) in conjunction with other information during the NEPA process to most effectively site project locations, such as by clustering disturbances and/or locating facilities in already disturbed areas. Although locatable mine sites are included in the degradation calculation, mining activities under the 1872 mining law may not be subject to the 3% disturbance cap. Details about locatable mining activities should be fully disclosed and analyzed in the NEPA process to assess impacts to sage-grouse and their habitat as well as to BLM goals and objectives, and other BLM programs and activities.

### **Additional Information/Formulas**

A collaborative effort in Idaho developed a disturbance calculation method that includes the 3% disturbance cap plus a modifier that includes effective habitat and is described in Appendix G of their ADPP. The formulas below are excerpted from that Appendix.

Disturbance Calculations for the BSU:

$$\begin{aligned} & \text{Disturbance Percentage} \\ & = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^1}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within the BSU}}{\text{Acres within the BSU}} + 0.3 \right)} \right) \times 100 \end{aligned}$$

Disturbance Calculations for Project Analysis Areas (PAAs):

$$\text{Disturbance Percentage} = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}^{12}}{\text{Acres within the PAA} * \left( \frac{\text{Acres of Effective Habitat within the PAA}}{\text{Acres within the PAA}} + 0.3 \right)} \right) \times 100$$

<sup>1</sup> see Table 3. <sup>2</sup> see Table 2.

Project analysis area (PAA) method for permitting surface disturbance activities:

1. Determine potentially affected occupied leks by placing a four-mile buffer around the project boundary as defined by the proposed area of physical disturbance related to the project. All occupied leks within this buffer will be considered affected by the proposed project.
2. Next place a four mile boundary around each of the occupied leks identified in item 1, above.
3. The polygon formed by the merging and dissolving of polygons from step 1 and 2 creates the Project Analysis Area (PAA) for surface disturbance activities.
4. Map existing disturbances within the analysis area or use locally available spatial data. Use of digitized NAIP imagery is recommended.
5. Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
6. Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
7. Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1 facility per 640 acres, averaged across project analysis area, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1 facility per 640 acres, averaged across the project analysis area, either defer the proposed project or co-locate it into existing disturbed area.
8. If a project that would exceed the degradation cap or density cap cannot be deferred due to valid existing rights or other existing laws and regulations, fully disclose the local and regional impacts of the proposed action in the associated NEPA.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

**Table 2.** The seven additional features to include in the disturbance calculation at the project scale

<ol style="list-style-type: none"> <li>1. Coalbed Methane Ponds</li> <li>2. Meteorological Towers</li> <li>3. Nuclear Energy Facilities</li> <li>4. Airport Facilities and Infrastructure</li> <li>5. Military Range Facilities &amp; Infrastructure</li> <li>6. Hydroelectric Plants</li> <li>7. Recreation Areas Facilities and Infrastructure</li> </ol>
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**Table 3.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

<b>USFWS Listing Decision Threat</b>	<b>Sagebrush Availability</b>	<b>Habitat Degradation</b>	<b>Energy and Mining Density</b>
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

## **Background**

In the USFWS's 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse's habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 7 types of features that are threats to sage-grouse will be used in the project analysis areas.

		Scales		
		Broad/Mid (Populations)	Intermediate (BSU)	Local/Project (Seas. Hab.)
Habitat Degradation	Unit:	WAFWA Populations	Biologically Significant Unit	Project/Local Habitat Area <sup>5</sup>
	Area of Interest:	PHMAs	PHMAs	PHMAs
	Data:	Westwide degradation data	Westwide <sup>2</sup> , State, Local	State, Local
	Formula (Measure 2a):	<u>12 Degradation Threats</u> PHMAs in Populations	<u>12 Degradation Threats</u> PHMAs in BSUs	<u>12 Degradation Threats + 7<sup>7</sup></u> PHMAs in Proj. <sup>5</sup>
	Management:	Internal BLM & FS estimates	3% Cap, Adapt. Mgmt <sup>4</sup>	3% Disturbance Cap
	All Lands:	Yes	Yes	Yes
	Fire Included:	No	No	No
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	State Offices or Field Offices
Sagebrush Availability	Unit:	WAFWA Populations	Biologically Significant Unit	n/a
	Area of Interest:	PHMAs	PHMAs	
	Data:	LANDFIRE Updated EVT	Updated EVT or State data	
	Formula (Measure 1a):	<u>Existing Updated Sagebrush</u> PHMAs in Populations	<u>Existing Updated Sagebrush</u> PHMAs in BSUs	
	Management:	Internal BLM & FS estimates	Adaptive Management <sup>4</sup>	
	All Lands:	Yes	Yes	
	Fire Included:	Yes	Yes	
	Who:	BLM NOC	BLM NOC <sup>2</sup> or State Offices	
Energy and Mining	Unit:	WAFWA Populations	n/a	Project Area & Seasonal Hab.
	Area of Interest:	PHMAs		PHMAs
	Data:	Westwide well & mine data		Westwide <sup>2</sup> , State data
	Formula (Measure 3):	<u>Well Pads and Mines</u> <sup>1</sup> Square Mile		<u>Well Pads and Mines</u> <sup>1</sup> Square Mile
	Management:	Internal BLM & FS estimates		Project Authorization
	All Lands:	Yes		Yes
	Fire Included:	No		No
	Who:	BLM NOC		BLM NOC or SOs or FOs

**ACRONYMS**

PHMA = Priority Habitat Management Area      BSU = Biologically Significant Unit  
 EVT = Existing Vegetation Type              BpS = Areas of Biotic Potential

<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.  
<sup>2</sup> Westwide data will be used only if state or local data are not available.  
<sup>3</sup> This footnote was removed from the table. January 2015.  
<sup>4</sup> This may be one of several variables used to inform Adaptive Management. The BSU is the scale at which Adaptive Management will be applied.  
<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data/analysis should be used for Adaptive Management  
<sup>6</sup> The project analysis area will be based on a 4-mile radius polygon around the project area combined with a 4-mile buffer around any lands within the project boundary in PHMA (Idaho methodology).  
<sup>7</sup> See Table 2

## Attachment III

### **Greater Sage-Grouse (GRSG) Land Use Plans Vegetation Objectives Guidance**

#### **Purpose**

- I. Provide the planning units with land use planning vegetation objectives that need to be incorporated into the administrative draft proposed plans.
- II. Provide guidance on the use of a template for GRSG habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on prioritizing land health assessments in sage-grouse habitats and conducting assessments at the watershed scale using the sage-grouse habitat objectives.

#### **Guidance**

- I. Planning units will include the following land use plan vegetation objective within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:

*In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*
- II. Planning units will populate the GRSG Habitat Objectives table template to provide vegetation objectives for sage-grouse life history stages based on the ecology in your region to be used to meet the applicable land health standard in GRSG habitats. Planning units are encouraged to work across boundaries when developing the objectives to ensure regional continuity and will provide appropriate peer-reviewed science to support the habitat values for the indicators. These desired condition value can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%). Planning units may include additional indicators and desired condition values as appropriate (see the Sage-Grouse Habitat Assessment Framework (HAF, *Technical Reference 6710-1*) for appropriate indicators). The HAF contains values for habitat suitability indicators in sage-grouse seasonal habitats from the Connelly et al. (2000) sage-grouse guidelines and has incorporated many of the core indicators in the AIM strategy (Toevs et al. 2011) as well. Planning units may use the indicator values from Connelly et al. (2000) while developing the land use plan Sage-Grouse Habitat Objectives table.

When using the indicators to guide management actions or during land health assessments, consider that the indicators are sensitive to the ecological processes operating at the scale of interest and that a single habitat indicator does not necessarily define habitat suitability for an area or particular scale. Indicators must be collectively reviewed, assessed based on the site potential, and put into spatial and temporal context to correctly determine habitat suitability which will include more than one scale and multiple indicators. Assessment and evaluation of these objectives will follow the steps described in the HAF.

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP and is to be used as a minimum to meet the applicable land health standard in sage-grouse habitats.

Greater Sage-Grouse Habitat Objectives

ATTRIBUTE	INDICATORS	DESIRED CONDITION	Reference
<b>BREEDING AND NESTING (Seasonal Use Period March 1-June 15)</b>			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height Arid sites Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover Arid sites Mesic sites		
	Perennial grass and forb height		
	Perennial forb canopy cover Arid sites Mesic sites		
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>			
Cover	% of Seasonal habitat meeting desired condition		
	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		



- III. The BLM will prioritize land health assessments in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. Field offices are to conduct land health assessments at the watershed scale and use the GRSG habitat objectives when assessing the applicable standard in GRSG habitats.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in GRSG designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment IV

### **Incorporating GSGR RMP Decisions into Grazing Authorizations**

#### **Purpose**

The purpose is to provide recommended ADPP language; outline the process for prioritizing the review and processing of grazing permits/leases to determine if modification is necessary (prior to renewal and in accordance with prioritization criteria); provide direction for including specific management thresholds and defined responses that will allow adjustments to livestock grazing within the terms and conditions of permits; and provide a process for prioritizing compliance monitoring within Sagebrush Focal Areas (SFAs) and Priority Habitat Management Areas (PHMAs).

#### **Background**

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple-use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By statute and regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Various appropriation authorities enacted between 1999 and 2014 extending terms and conditions of expiring or transferred permits/leases that the BLM is unable to fully process before their expiration; or
- Section 402(c)(2) of FLPMA (as amended by Public Law 113-291, enacted December 19, 2014).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The FLPMA amendment to Section 402 (c) allows BLM to renew

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015.” The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in

grazing permits and leases under the same terms and conditions. This relieves the BLM's renewal processing workload, allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.<sup>2</sup>

The BLM may modify terms and conditions of a permit or lease at any time following completion of appropriate analysis and consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public.<sup>3</sup> Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record. Copies of the decisions are provided to the interested publics.

**Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:**

- The BLM will prioritize the review of grazing permits/leases, including those prior to renewal to determine if modification is necessary, and processing of grazing permits and leases, in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource conditions (ex., fire) and legal obligations.
- The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.
- Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to

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the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.

<sup>2</sup> The newly amended section 402(c) of FLPMA provides permanent authority to BLM to renew expiring permits. That section states, “The terms and conditions in a grazing permit or lease that has expired, or was terminated due to a grazing preference transfer, shall be continued under a new permit or lease until the date on which the Secretary concerned completes any environmental analysis and documentation for the permit or lease required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and other applicable laws.”

<sup>3</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

help ensure compliance with the terms and conditions within the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.

- At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

### **Addressing GRSG RMP Amendments/Revisions Objectives in Grazing Permits/Leases**

BLM will develop criteria to prioritize the workload to process permits/leases (either fully processed or reauthorized based on the Appropriations rider, or issued under Section 402(c)(2) of FLPMA) and determine whether modification is necessary prior to renewal within PHMAs, beginning with those in SFAs. In setting priorities, those containing riparian areas and areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential criteria for prioritizing permit modifications could include:

- Are there riparian areas or wet meadows in the permit/lease area?
- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet GRSG habitat objectives found in the Special Status Species section of the land use plan?
- Is there data that indicates that the GRSG habitat objectives, including the Habitat Objectives table, found in the Special Status Species section of the land use plan are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

Additionally, if an existing permit/lease within PHMAs requires modification because current grazing is a significant causal factor for not meeting the Land Health Standards, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Adjustments to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

## **Compliance Monitoring**

The BLM will monitor grazing permits/leases renewed or modified in accordance with the direction contained in this guidance as follows: Allotments within SFAs, followed by those in other PHMA, and focusing on those with riparian areas, will be prioritized for monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Vegetation Condition
- Actual Use
- Utilization
- Use Supervision

## **Concerning Voluntary Relinquishments**

All ADPPs will include the following language:

At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.

For completing this, BLM offices should use [WO IM 2013-184 Relinquishment of Grazing Permitted Use](#) or the most recent policy guidance.

Attachment V

**Applying Lek Buffer-Distances When Approving Actions**

- *Buffer Distances and Evaluation of Impacts to Leks*

Evaluate impacts to leks from actions requiring NEPA analysis. In addition to any other relevant information determined to be appropriate (e.g. State wildlife agency plans), the BLM will assess and address impacts from the following activities using the lek buffer-distances as identified in the USGS Report *Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review* ([Open File Report 2014-1239](#)). The BLM will apply the lek buffer-distances specified as the lower end of the interpreted range in the report unless justifiable departures are determined to be appropriate (see below). The lower end of the interpreted range of the lek buffer-distances is as follows:

  - linear features (roads) within 3.1 miles of leks
  - infrastructure related to energy development within 3.1 miles of leks.
  - tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks.
  - low structures (e.g., fences, rangeland structures) within 1.2 miles of leks.
  - surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks.
  - noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.

Justifiable departures to decrease or increase from these distances, based on local data, best available science, landscape features, and other existing protections (e.g., land use allocations, state regulations) may be appropriate for determining activity impacts. The USGS report recognized “that because of variation in populations, habitats, development patterns, social context, and other factors, for a particular disturbance type, there is no single distance that is an appropriate buffer for all populations and habitats across the sage-grouse range”. The USGS report also states that “various protection measures have been developed and implemented... [which have] the ability (alone or in concert with others) to protect important habitats, sustain populations, and support multiple-use demands for public lands”. All variations in lek buffer-distances will require appropriate analysis and disclosure as part of activity authorization.

In determining lek locations, the BLM will use the most recent active or occupied lek data available from the state wildlife agency.

- *For Actions in GHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis.

  - Impacts should first be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.
  - If it is not possible to relocate the project outside of the applicable lek buffer-distance(s) identified above, the BLM may approve the project only if:
    - Based on best available science, landscape features, and other existing protections, (e.g., land use allocations, state regulations), the BLM determines that a lek buffer-distance other than the applicable distance identified above offers the same or a greater

level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area; or

- The BLM determines that impacts to GRSG and its habitat are minimized such that the project will cause minor or no new disturbance (ex. co-location with existing authorizations); and
- Any residual impacts within the lek buffer-distances are addressed through compensatory mitigation measures sufficient to ensure a net conservation gain, as outlined in the Mitigation Strategy (Appendix X).

- *For Actions in PHMA*

The BLM will apply the lek buffer-distances identified above as required conservation measures to fully address the impacts to leks as identified in the NEPA analysis. Impacts should be avoided by locating the action outside of the applicable lek buffer-distance(s) identified above.

The BLM may approve actions in PHMA that are within the applicable lek buffer distance identified above only if:

- The BLM, with input from the state fish and wildlife agency, determines, based on best available science, landscape features, and other existing protections, that a buffer distance other than the distance identified above offers the same or greater level of protection to GRSG and its habitat, including conservation of seasonal habitat outside of the analyzed buffer area.
- The BLM will explain its justification for determining the approved buffer distances meet these conditions in its project decision.



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Definition of Significance for adaptive population trigger

1 message

Makela, Paul &lt;pmakela@blm.gov&gt;

Thu, Oct 23, 2014 at 1:09 PM

To: Brent Ralston &lt;bralston@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;

Cc: Ethan Ellsworth &lt;eellsworth@blm.gov&gt;

Brent/Jon,

Ann Moser sent a one pager describing triggers and the significance description they propose. I edited it with the current wording of the ADPP for the triggers (since they had morphed since the Alt E wording), and she was ok with it. See attached. This is mainly for the file, however wording needs to be inserted into the Plan (currently pages 26-27 of ADPP) as follows (or similar):

"Significance is defined by the 90% confidence interval around the current 3-year average of  $\lambda$  to evaluate whether  $\lambda$  is significantly less than 1.0. If the 90% confidence interval is less than and does not include 1.0, then  $\lambda$  is significantly less than 1.0. The  $\lambda$  and variance will be calculated following Garton et al. (2011)."

Garton, E. O., J. W. Connelly, J. S. Horne, C. A. Hagen, A. Moser, and M. A. Schroeder. 2011. Greater sage-grouse population dynamics and probability of persistence. *Studies in Avian Biology* 38: 293-382.

—  
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### **Adaptive Triggers:**

The Idaho and Southwestern Montana Proposed Plan (Plan) describes soft and hard habitat and population triggers as follows:

#### Habitat:

5.7. AM-7: Adaptive Regulatory Criteria for **Hard Habitat Triggers** are defined as:

- A 20 percent loss of Key Habitat within the biologically significant unit (BSU) (Appendix G) of the PHMA of a CA when compared to the 2011 baseline (the BSU is defined as the nesting and wintering habitat within a Priority and Important Habitat Management Areas (separately) within a Conservation Area, inclusive of all ownerships); or
- A 20 percent loss of Key Habitat within the BSU of the IHMA of a CA when compared to the 2011 baseline.

5.8. AM-8: Adaptive Regulatory Criteria for **Soft Habitat Triggers** are defined as:

- A 10 percent loss of Key Habitat within the BSU of the PHMA of a CA when compared to the 2011 baseline; or
- A 10 percent loss of Key Habitat within the BSU of the IHMA of a CA when compared to the 2011 baseline.

#### Population:

5.9. AM-9: Adaptive Regulatory Criteria for **Hard Population Triggers** are defined as:

A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within PHMA within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline; or  
A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within IHMA within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline.

5.10. AM-10: Adaptive Regulatory Criteria for **Soft Population Triggers** are defined as:

A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within PHMA within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011; or  
A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within IHMA within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011.

#### **Definition of “Significance” for Hard Population Trigger:**

The Governor’s Alternative (E) did not define criteria for “significantly less than 1.0”. For purposes of the Plan, IDFG proposes to use a 90% confidence interval around the current 3-year average of  $\lambda$  to evaluate whether  $\lambda$  is significantly less than 1.0. If the 90% confidence interval is less than and does not include 1.0, then  $\lambda$  is significantly less than 1.0. The  $\lambda$  and variance will be calculated following Garton et al. (2011). A 90% confidence interval is justified because:

1. Under a 90% confidence interval the probability of making a false conclusion is 10%, however, the error will be on the conservative side; i.e., the error would benefit the sage-grouse population.
2. The  $\lambda$  criteria would not be used alone; as stated in the ADPP,  $\lambda$  would be used in concert with trend in maximum number of males.

Garton, E. O., J. W. Connelly, J. S. Horne, C. A. Hagen, A. Moser, and M. A. Schroeder. 2011. Greater sage-grouse population dynamics and probability of persistence. *Studies in Avian Biology* 38: 293-382.



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**RE: Question on sagegrouse**

1 message

Brent Ralston &lt;bralston@blm.gov&gt;

Tue, Nov 11, 2014 at 7:43 PM

To: Jeffery Foss &lt;jfoss@blm.gov&gt;, Paul Makela &lt;pmakela@blm.gov&gt;

Cc: Timothy Murphy &lt;tmurphy@blm.gov&gt;, Ethan Ellsworth &lt;ellsworth@blm.gov&gt;, Scott Hoefler &lt;shoefler@blm.gov&gt;, Jonathan Beck &lt;jmbeck@blm.gov&gt;

Jeff,

Yes, I have talked with the Tribe at the Wings and Roots venue about two issues: 1) the noise concern and the sonic booms which are suspected by the Tribe as causing mortality of chicks while developing within the egg; and 2) concern over the use of chaff and flares. The first occasion was in July 2012 where they raised the concern over military overflights. After that meeting I chatted with Paul regarding any know literature regarding this activities effects of mortality to sage-grouse and at that point there wasn't any that we found. I also spoke with Carl Rudeen at the Mountain Home Air Force Base and he shared the EA that the Base had done. The use of chaff and flares is a use authorized by FAA & FCC (as described in IB 2001-030) and evaluated in NEPA conducted by the Mountain Home Air Force Base (March 29, 2010 Environmental Assessment).

The bottom line is that BLM does not have any authority or say in military overflights which is authorized by the FAA or the use of chaff and flares which are also authorized by the FAA & FCC.

At the September 2012 Wings and Roots meeting I communicated that the GRSG EIS was not the appropriate venue to address this concern and that BLM did not have the authority – that the Tribes should coordinate/consult with the Air Force over these issues. That caused a small reaction that quickly blew entirely out of sorts with Doug (the facilitator) indicating that I had single-handedly destroyed the working relationship that previously existed and that he would be contacting Mike Poole and Tom Dyer to express this concern.

At this meeting I had also shared out preliminary alternatives, including the Governor's Alternative. After the initial reaction, Gary, who had been leafing through the material, brought up that we were indeed addressing noise, in that we had a management action specific to noise levels around leks. We talked about those management actions and that they would be applied to BLM authorized activities. That seemed to mollify the concern and the reaction seemed to blow over as I left with everything back on good terms. In addition we acknowledged the lack of any specific scientific studies relating to chick mortality and sonic booms and that this may be something for the Tribe with assistance from university researchers to develop a study to investigate.

In my subsequent meetings with Wings and Roots the concern over noise; i.e. sonic booms and mortality of chicks in the eggs; has come up at least two other time as more of an FYI for BLM without recognition that we have previously vetted this issue at the meeting previously and without any overt need for further BLM follow-up.

At my most recent meeting this came up again in the form of Ted 'telling a story' about his grandmother experience that jets flying above and the associated sonic boom would kill chicken chicks in the eggs. This seems to be the root of the concern without any scientific studies that would support this.

We will identify the sound concern in the EIS acknowledging the concern and the discussions and the need for further investigation but there will not be any discussion in effects analysis since that is an effect that cannot be verified and described for effects. For the chaff concern we will identify that concern as well in the cumulative effects description and reference the effects as described in the Air Force EA.

From IB 2001-030:

N. The BLM will work cooperatively with the military to minimize any effects from the use of chaff and flares. The BLM has no legal authority to regulate the use of chaff and flares or the military use of chaff and flares above public lands regulated by the FAA and FCC. In the environmental hazards management case the use of chaff and flares over public lands is considered the valid use of a product(s) for its intended purpose. (Note See "Definitions and Acronyms" attachment for explanation of the terms "chaff" and "flares.")

Discussion: Chaff and flares properly dispersed in accordance with military policy and procedures over public land have minimal to no impact. Improperly dispersed chaff or chaff canisters which malfunction can have clumps of chaff on the ground and all chaff releases leave plastic caps that degrade at a relatively low rate. Chaff consists of aluminum coated fibers similar in size to human hair. To be effective, chaff is normally dropped at altitudes above 12,000 feet above mean sea level (MSL) and chaff is most often carried aloft in upper level winds for great distances (hundreds of miles). Properly dispersed chaff disperses so that it is non-detectable on the ground. There is no recent study on the effects of chaff condensation, although additional study is recommended. There are no known negative environmental or health effects from the use of chaff.

Properly dispersed flares travel less distance in the upper winds than chaff and burn out prior to hitting the ground, but may leave small amounts of debris. Wildfires have been known to start from unburned low level use of flares.

The use of chaff and flares near Congressionally designated areas or special management areas where the lands are managed so that the land and its community of life untrammelled by man and where man himself is a visitor who does not remain", e.g., wilderness areas, wilderness study areas, and wild segments of wild and scenic rivers is an area of concern. In these areas, the release of chaff and flares below the authorized altitudes could potentially cause impacts that may not be in keeping with the Congressional designation of the areas.

Where chaff and flares are being dispersed in the proximity of special management areas, the impacts of improperly dispersed chaff and flares need to be considered. BLM and military cooperation is paramount in meeting the intent of Congress relative to the management of special management areas.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

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From: Jeffery Foss [mailto:jfoss@blm.gov]  
 Sent: Tuesday, November 11, 2014 5:40 PM  
 To: Makela, Paul  
 Cc: Timothy Murphy; Ethan Ellsworth; Scott Hoefer; Brent Ralston  
 Subject: Re: Question on sagegrouse

I know Brent addressed this issue with the tribe-- I believe at a Wings and Roots meeting

Jeff

Sent from my iPhone

On Nov 7, 2014, at 6:03 PM, "Makela, Paul" <[pmakela@blm.gov](mailto:pmakela@blm.gov)> wrote:

Tim,

Regarding military over flights and GRSG, there is not a lot of info, but some. The attached Word document contains a section I copy/pasted from the June 2012 Mountain Home Air Force Base "Integrated Natural Resource Management Plan" that acknowledged a temporary response by GRSG could occur, and low level flights could cause stress. However in the mitigation bullets they state that "Flight activities are dispersed across MOA airspace to reduce associated noise."

I am unable to locate other recent literature on the subject at this time, however the 2010 FWS 2010 Finding references timing limitations to military flights, at the Yakima Training Center in Washington, and says: "Leks have a 1-km (0.6-mi) buffer where all training is excluded, and aircraft below 91.4 m (300 ft) are restricted from midnight to 9 am from March 1 to May 15 (Stinson et al. 2004, p. 32)."

I am following up with a few colleagues. I will let you know if I find more.

Paul

----- Forwarded message -----

From: Foss, Jeffery <[jfoss@blm.gov](mailto:jfoss@blm.gov)>

Date: Fri, Nov 7, 2014 at 3:19 PM

Subject: Fwd: Question on sagegrouse

To: Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, Paul Makela <[pmakela@blm.gov](mailto:pmakela@blm.gov)>, Ethan Ellsworth <[eellsworth@blm.gov](mailto:eellsworth@blm.gov)>

Cc: Scott Hoefer <[shoefer@blm.gov](mailto:shoefer@blm.gov)>

Paul, please discuss this with our folks and get back with Tim.

Thanks

Jeff

----- Forwarded message -----

From: Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>

Date: Fri, Nov 7, 2014 at 9:04 AM

Subject: Fwd: Question on sagegrouse

To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>

Please ask our WL leads for input here. Thanks

Sent from my iPhone

Begin forwarded message:

From: Buster Gibson <[gibson.buster@shopai.org](mailto:gibson.buster@shopai.org)>  
Date: November 6, 2014 at 4:36:03 PM MST  
To: Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
Subject: Question on sagegrouse

Tim, another thought I have besides cultural resources monitoring post fire is has anyone studied the effects of the air force on sage grouse nesting/egg hatching I have heard stories from elders saying it has effected egg hatching in their chickens. As the air force operates over the entire strong hold for sage grouse northern Nevada, southern Idaho, and eastern Oregon. Just another thought  
Thanks  
Buster Gibson ,Vice-Chairman Shoshone-Paiute Tribes

--

Jeff Foss

Deputy State Director- Resources, Idaho BLM

1387 S. Vinnell Way, Boise, ID 83709

208-373-3800

[jfoss@blm.gov](mailto:jfoss@blm.gov)

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Paul Makela

Wildlife Program Lead

Idaho BLM State Office

Branch of Resources and Science

1387 S. Vinnell Way

Boise, ID 83709

Office (208) 373-3809

Fax (208) 373-3805 Fax

8/18/2015

DEPARTMENT OF THE INTERIOR Mail - RE: Question on sagegroue

[pmakela@blm.gov](mailto:pmakela@blm.gov)

<Military\_Flights\_and\_GRSG\_MHAFB\_INRMPlan\_Excerpt.docx>

IDMT\_PUB\_5811  
1.2  
08/25/2015



Murphy, Timothy <tmurp...

### SG issue for discussion on today's call

1 message

**Carman, Stephanie** <scarman@blm.gov>

Tue, Dec 23, 2014 at 12:42 PM

To: James Kenna <jkenna@blm.gov>, Jerome Perez <jperez@blm.gov>, Juan Palma <jpalma@blm.gov>, Ruth Welch <rwelch@blm.gov>, Amy Lueders <alueders@blm.gov>, Donald Simpson <dsimpson@blm.gov>, Howard Hedrick <hhedrick@blm.gov>, Jamie Connell <jconnell@blm.gov>, Karen Mouritsen <Kmourits@blm.gov>, Michael Nedd <mnedd@blm.gov>, Ronald Dunton <rdunton@blm.gov>, Timothy Murphy <tmurphy@blm.gov>  
Cc: Edwin Roberson <eroberso@blm.gov>, Steven Ellis <sellis@blm.gov>, Neil Kornze <nkomze@blm.gov>

Attached and pasted below is the proposed language for discussion on the conference call today regarding use of the USGS buffer report.

#### BLM Proposal:

The lek buffer-distance (interpreted range-lower) identified in the USGS Review (Open File Report 2014-1239) will be included in all ADPPs as a Required Design Feature (RDF) in both PHMA and GHMA (except for WY, due to their "core area" approach). This RDF will require the use of these lek buffers for linear features, energy development, tall structures, low structures, general surface disturbance, and noise and related disruption activities.

The buffer RDF must be applied to BLM-authorized activities as follows, as appropriate for the project being analyzed:

#### For all PHMA:

*Ann C. preparing lang. mods. to clarify implementation level analysis/screening*

Require the use of the lower interpreted range lek buffer-distances identified in the USGS report *Conservation Buffer Distance Estimates for Greater Sage-Grouse—A Review* [1], or best available science, when analyzing, developing conditions of approval, and authorizing activities in PHMA to ensure appropriate protection of habitat. At a minimum, this includes applying the following specifications as applicable:

Locate linear features at least 3.1 miles from leks

Site infrastructure related to energy development at least 3.1 miles from leks.

- Site tall structures (e.g., communication or transmission towers) at least 2 miles from leks.

• Site low structures (e.g. rangeland improvements) at least 1.2 miles from leks.

- Site all other surface disturbance not associated with linear features, energy development, tall structures, or low structures at least 3.1 miles from leks.

- Site noise and related disruption activities (including those that do not result in habitat loss) at least 0.25 miles from leks.

*use in NEPA process analysis/screening/decision-making USE Best Avail. Science*

*Analyze these buffers when analyzing projects*




**For all GHMA:**

*This RDF must be applied to all BLM-authorized activities unless the BLM, through site-specific analysis, determines that: (1) the RDF is not applicable to the site-specific conditions; or (2) the BLM can demonstrate that an alternative RDF or management approach achieves the appropriate level of protection.* NEPA

*local line officer  
decision w/ FWS/F+G*

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator (Acting)  
office 202-208-3408  
mobile 202-380-7421  
scarman@blm.gov

 **Lek Buffer Issue\_12.23.2014.Alternative BLM clean.docx**  
26K

## Brent Ralston

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**From:** Brent Ralston  
**Sent:** Thursday, September 25, 2014 1:14 PM  
**To:** Natalie Cooper (ncooper@blm.gov); Karen Porter (kfporter@blm.gov)  
**Subject:** FW: Correct Table 2  
**Attachments:** TEDS TABLE 2 SUMMARY NUMBERS v.2.xlsx

Here is some information regarding a call I'm hoping you can join me on tomorrow at 11:00 in the Eagle Room. The call is talking about the disturbance estimates tables we developed a couple weeks ago.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

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**From:** Lauren Mermejo [<mailto:lmermejo@blm.gov>]  
**Sent:** Thursday, September 25, 2014 12:29 PM  
**To:** Brent Ralston; David Batts; Dennis Mackey; Frank Quamen; Glen Stein; Jesse DElia; Joan Suther; Lauren Mermejo; Leisa Wesch; Matt Magaletti; Quincy Bahr; Randy Sharp; Ronald Baxter; Stephen Small; Ted Koch  
**Subject:** FW: Correct Table 2

Hi All –

Can't find Joe to send this forward, so I am doing it for him in order to be prepared for our call tomorrow on Great Basin Projected Development at 10:00 Pacific Time. Joe sent out four files yesterday for our discussion tomorrow....but this table has been updated for our discussion. Please replace the table sent out yesterday entitled "Copy of TEDS TABLE 2 SUMMARY NUMBERS FWS" with the table above.

Thanks,  
Lauren

**From:** Baxter, Ronald [[mailto:ronald\\_baxter@fws.gov](mailto:ronald_baxter@fws.gov)]  
**Sent:** Thursday, September 25, 2014 11:23 AM  
**To:** Lauren Mermejo  
**Subject:** Correct Table 2

## Attached per our conversation

## R

--  
Ronald J. Baxter  
Endangered Species Biologist  
U.S. Fish and Wildlife Service  
1340 Financial Blvd., Suite 234  
Reno, NV 89502  
(775) 861-6377 (office)  
(951) 237-8404 (cell)

Existing Rights Reasonably Foreseeable Development  
SUMMARY  
Great Basin Sub-Region

**Table 2. Great Basin Existing Conditions / Projections of Future Development - Direct Impacts**  
(Initial estimates only based on available information - refinement of these values is expected)

Programs Generally Incompatible with Sage-Grouse Conservation												
		NV/CA - Acres	%	OR - Acres	%	ID - Acres	%	SW MT - Acres	%	UT - Acres	%	TOTALS:
SOLAR	Currently Authorized	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0
	RFD	0	0.000	0	0.000	0	0.000	0	0.000			0
WIND	Currently Authorized	61,638	0.347	0	0.000	0	0.000	0	0.000	0	0.000	61,638
	RFD	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0
ROWS	Currently Authorized	1,493	0.008			82,945	0.700	18,900	1.000	1,027	0.019	104,367
	RFD											0
FLUID MINERALS	Currently Authorized	1,900	0.011	42,342 *	0.410	4,135	0.040			9,359	0.807	15,394
	RFD	1,246	0.007			20	0.000			4,242	0.104	5,508
NON-ENERGY LEASABLES	Currently Authorized	61,425	0.346	0	0.000	66	0.000			5,362	0.097	66,853
	RFD	0	0.000	0	0.000	66	0.000					66
SALABLE MINERALS	Currently Authorized	23,081	0.013	10,990 *	0.065	12,000	0.100			24,173		59,254
	RFD	0	0.000			1,500	0.010					1,500
ROWS & CORRIDORS	Currently Authorized	216,834	1.222	1,168,629	11.400	66,588	0.500	23,110	1.160	5,854	0.106	1,481,029
	RFD			1,900								1,900
GEOHERMAL	Currently Authorized	465	0.003	45,501 *	0.450	25,571	0.200	0	0.000	500	0.009	26,537
	RFD	0	0.000			410	0.003	0	0.000	4		414
LOCATABLES	Currently Authorized	36,475	0.206	20,000 *	0.195	13,260	0.120			193	0.003	49,929
	RFD	22,800	0.130			240	0.002					23,040
<b>TOTALS:</b>		<b>427,357</b>	<b>2.293</b>	<b>1,170,529</b>	<b>12.520</b>	<b>206,801</b>	<b>1.675</b>	<b>42,010</b>	<b>2.160</b>	<b>50,714</b>	<b>1.145</b>	<b>1,897,429</b>

\* Value approximate - based on average of PPMA & PGMA percentages

Programs Not Necessarily Incompatible with Sage-Grouse Conservation												
LIVESTOCK GRAZING	Currently Authorized	16,009,700	90.200	9,983,278 **	98.700	11,180,900	97.500			3,254,000	97.100	30,444,886
	RFD	0	0.000			0	0.000					0
RECREATION	Currently Authorized			5,000		600	0.005					5,600
	RFD					25	0.000					25
<b>TOTALS:</b>		<b>16,009,700</b>	<b>90.200</b>	<b>5,000</b>	<b>98.700</b>	<b>11,181,525</b>	<b>97.505</b>			<b>3,254,000</b>	<b>97.100</b>	<b>30,450,511</b>

Data not currently available =

\* Oregon indicates these values have not changed significantly in apx. 8 years, and are not expected to change, but there exists a slight possibility that it could increase 10%-20%.

\*\* Oregon indicates that there will be a decrease of apx. 22,000 acres due to the closing of 13 sagebrush natural areas to grazing.

## Brent Ralston

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**From:** Pyron, Jason  
**Sent:** Thursday, September 25, 2014 7:40 AM  
**To:** Brent Ralston  
**Cc:** Katie Powell; Kathleen Hendricks  
**Subject:** Fwd: Draft Discretionary Action Criteria/Screen  
**Attachments:** Discretionary action screen and mitigation process. DFT 9-22-14.docx

I'm taking a quick look at this Brent. I'm thinking that this maybe one of those items that we asked or told to add to the EIS at some point. Thought I would give you a heads up and that you might be able to work through your chain to see if we could learn anymore. My initial concern at this point is that it may conflict with the criteria that we already have in place, but some simple semantics may make it complimentary.?? We have until early next week to get back to Pat regarding comments/concerns. As I'll be out fishing, you may need to coordinate with Kathleen and Katie if we have concerns. I'll be in today and tomorrow morning if you would like to discuss.

Katie - please take a look and give me your thoughts as well.

Thanks,  
Jason

----- Forwarded message -----

**From:** Deibert, Pat <[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)>

**Date:** Wed, Sep 24, 2014 at 9:31 AM

**Subject:** Fwd: Draft Discretionary Action Criteria/Screen

**To:** Kevin Shelley <[kevin\\_shelley@fws.gov](mailto:kevin_shelley@fws.gov)>, Jeff Berglund <[Jeff\\_Berglund@fws.gov](mailto:Jeff_Berglund@fws.gov)>, Terry Quesinberry <[terry\\_quesinberry@fws.gov](mailto:terry_quesinberry@fws.gov)>, Creed Clayton <[creed\\_clayton@fws.gov](mailto:creed_clayton@fws.gov)>, Jay Martini <[jay\\_martini@fws.gov](mailto:jay_martini@fws.gov)>, Terry Ireland <[terry\\_ireland@fws.gov](mailto:terry_ireland@fws.gov)>, Alex Schubert <[alex\\_schubert@fws.gov](mailto:alex_schubert@fws.gov)>, Jason Pyron <[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)>, Katie Powell <[katie\\_powell@fws.gov](mailto:katie_powell@fws.gov)>, Ronald Baxter <[ronald\\_baxter@fws.gov](mailto:ronald_baxter@fws.gov)>, Steve Abele <[steve\\_abele@fws.gov](mailto:steve_abele@fws.gov)>, Genevieve Skora <[genevieve\\_skora@fws.gov](mailto:genevieve_skora@fws.gov)>, Lee Corum <[lee\\_corum@fws.gov](mailto:lee_corum@fws.gov)>, Jeffrey Dillon <[jeffrey\\_dillon@fws.gov](mailto:jeffrey_dillon@fws.gov)>, Jeff Everett <[jeff\\_everett@fws.gov](mailto:jeff_everett@fws.gov)>, Jessica Gonzales <[Jessica\\_Gonzales@fws.gov](mailto:Jessica_Gonzales@fws.gov)>, Heather McPherron <[heather\\_mcpherron@fws.gov](mailto:heather_mcpherron@fws.gov)>, Jennifer Siani <[jennifer\\_siani@fws.gov](mailto:jennifer_siani@fws.gov)>, Elise Snider <[elise\\_snider@fws.gov](mailto:elise_snider@fws.gov)>

**Cc:** Scott Larson <[scott\\_larson@fws.gov](mailto:scott_larson@fws.gov)>, Jodi Bush <[jodi\\_bush@fws.gov](mailto:jodi_bush@fws.gov)>, Brent Esmoil <[brent\\_esmoil@fws.gov](mailto:brent_esmoil@fws.gov)>, Mark Sattelberg <[mark\\_sattelberg@fws.gov](mailto:mark_sattelberg@fws.gov)>, Jesse DElia <[jesse\\_delia@fws.gov](mailto:jesse_delia@fws.gov)>, Susan Linner <[susan\\_linner@fws.gov](mailto:susan_linner@fws.gov)>, Larry Crist <[larry\\_crist@fws.gov](mailto:larry_crist@fws.gov)>, Laura Romin <[laura\\_romin@fws.gov](mailto:laura_romin@fws.gov)>, Kathleen Hendricks <[kathleen\\_hendricks@fws.gov](mailto:kathleen_hendricks@fws.gov)>, Paul Henson <[paul\\_henson@fws.gov](mailto:paul_henson@fws.gov)>

Hi everyone -

This is a product of the Rocky Mountain Federal Family meeting that we have been asked to provide input on. Its a screen that is being proposed for use in case of a project proposal located in important (PAC, PH, core, etc.) sage-grouse habitats. While the issue arose in the RM side of things, it may be used more widely.

Jeff Berglund helped BLM MT draft this, but we aren't certain all of his concerns have been 100% resolved. His primary caution with our review is that the goals and objectives, which this screen relies heavily

on, have yet to be defined. Therefore we only have part of the package (we decided it was like having a recipe but not knowing what the recipe was for). So, to assist with our review we can use the goal of sage-grouse conservation and maintaining or increasing affected populations.

BLM needs comments by Oct. 3, so I would like to get comments back by to me by Oct. 1 (the good news is its relatively short). That will allow time for consolidation and resolution of any potential conflicting concerns. If multiple folks are reviewing from the same office, please only send one set of comments.

Thank you -  
pat

----- Forwarded message -----

From: **Munson, Johanna** <[jmunson@blm.gov](mailto:jmunson@blm.gov)>  
Date: Tue, Sep 23, 2014 at 3:28 PM  
Subject: Draft Discretionary Action Criteria/Screen  
To: Pat Deibert <[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)>

Attached is the Draft with the "title". Should have included it in the earlier email....brain lapse:)

--

Johanna Munson  
Rocky Mountain Region GRSG Project Mgr  
Bureau of Land Management  
5353 Yellowstone Rd.  
Cheyenne, WY 82009

Office: 307-775-6329  
Cell: 307-433-4447  
Fax: 307-775-6042  
Email: [jmunson@blm.gov](mailto:jmunson@blm.gov)

*"It's not enough we do our best; sometimes we have to do what's required."*  
Sir Winston Churchill

--

Pat Deibert, PhD  
National Sage-grouse Conservation Coordinator  
Certified Wildlife Biologist®  
U.S. Fish and Wildlife Service  
5353 Yellowstone Road, Suite 308A  
Cheyenne, WY 82009  
307-772-2374, ext. 226

got leks?

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Jason Pyron  
Sage-Grouse Coordinator - Candidate Conservation  
Idaho Fish & Wildlife Office  
1387 S Vinnell Way, Room 368  
Boise, Idaho 83709  
Office (208-685-6958), Fax (208-378-5262)  
[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)

# DRAFT

## DISCRETIONARY ACTION CRITERIA AND MITIGATION PROCESS

The BLM/USFS will ensure that any activities or projects in greater sage-grouse habitats would: 1) only occur in compliance with [insert plan name] greater sage-grouse goals and objectives for priority and general management areas; and 2) maintain neutral or positive greater sage-grouse population trends and habitat by avoiding, minimizing, and offsetting unavoidable impacts while striving for net conservation gain at the scale of this land use plan and within greater sage-grouse population areas, State boundaries, and WAFWA Management Zones through the application of mitigation for implementation-level decisions. The mitigation process will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy, while also following Secretary of the Interior Order 3330 and consulting BLM, FWS and other current and appropriate mitigation guidance. If it is determined that residual impacts to greater sage-grouse from implementation-level actions would remain after applying avoidance and minimization measures to the extent possible, then compensatory mitigation projects will be used to offset residual impacts, or the project may be denied if necessary to achieve the goals and objectives for priority and general management areas in the [insert plan name].

To ensure that impacts from activities proposed in sage-grouse priority and general management areas are appropriately mitigated, the BLM will apply mitigation measures and conservation actions and potentially modify the location, design, construction, and/or operation of proposed land uses or activities to comply with statutory requirements for environmental protection. The mitigation measures and conservation actions [reference RDF/BMP appendix] for proposed projects or activities in these areas will be identified as part of the National Environmental Policy Act (NEPA) environmental review process, through interdisciplinary analysis involving resource specialists, project proponents, government entities, landowners or other Surface Management Agencies. Those measures selected for implementation will be identified in the Record of Decision (ROD) or Decision Record (DR) for those authorizations and will inform a potential lessee, permittee, or operator of the requirements that must be met when using BLM-administered public lands and minerals to mitigate, per the mitigation hierarchy referenced above, impacts from the activity or project such that sage-grouse goals and objectives are met. Because these actions create a clear obligation for the BLM to ensure any proposed mitigation action adopted in the environmental review process is performed, there is assurance that mitigation will lead to a reduction of environmental impacts in the implementation stage and include binding mechanisms for enforcement (CEQ Memorandum for Heads of Federal Departments and Agencies 2011).

To achieve the goals and objectives for priority and general management areas in the [insert plan name], the BLM will assess all proposed land uses or activities such as road, pipeline, cell tower, or powerline construction, fluid and solid mineral development, range improvements, and recreational activities proposed for location in sage-grouse priority and general management areas in a step-wise manner. The following steps identify a screening process for review of proposed activities or projects in these areas. This process will provide a consistent approach regardless of the administrative location of the project and ensure that authorization of these projects, if granted, will appropriately mitigate impacts and be consistent with the LUP goals and objectives for sage-grouse. The following steps provide for a sequential screening of proposals. However, Steps 2-6 can be done concurrently.

### Step 1 – Determine Proposal Adequacy

This screening process is initiated upon formal submittal of a proposal for authorization for use of BLM lands. The actual documentation of the proposal would include at a minimum a description of the

<sup>1</sup>Impacts to Greater Sage-Grouse could include loss or disturbance of nesting or wintering habitat as well as disruption of breeding activities at the lek site.

location, scale of the project and timing of the disturbance. The acceptance of the proposal(s) for review would be consistent with existing protocol and procedures for each type of use.

#### Step 2 – Evaluate Proposal Consistency with LUP Prescriptions

This initial review should evaluate whether the proposal would be allowed as prescribed in the Land Use Plan. For example, some activities are prohibited (e.g., excluded, closed, withdrawn, etc.) in sage-grouse habitat, such as wind developments in priority management areas. If the proposal is for an activity that is specifically prohibited, the applicant should be informed that the application is being rejected since it would not be allowed, regardless of the design of the project. Otherwise, proceed to Step 3.

#### Step 3 – Determine Projected Sage-Grouse Population and Habitat Impacts

Determine if the project will have a direct, indirect, or cumulative impact on sage-grouse population or habitat (priority or general management areas). This will include:

- Reviewing greater sage-grouse management area and habitat delineation maps.
- Reviewing current science / literature.
- Reviewing the sage-grouse effects analysis in the LUP EIS, and similar effects analyses
- Reviewing USGS Open File Report 2013-1098 (the ‘Baseline Environment Report’) which identifies areas of direct and indirect effects for various anthropogenic activities.
- Consultation with State Wildlife Agency biologists.
- Evaluating consistency with (at a minimum) State sage-grouse regulations, Executive Orders, etc.
- Or other methods needed to provide an accurate assessment of impacts.

If the proposed project or activity would not have a negative direct or indirect impact on either the habitat or population, document the findings in the NEPA analysis and proceed with the appropriate process for review, decision and potential implementation of the project. Otherwise, proceed to Step 4.

#### Step 4 – Determine Proposal Consistency with Disturbance Limitations

If the proposed activity could have a direct or indirect impact on sage-grouse habitat or population, evaluate whether the projected disturbance from the activity would exceed the limit on the amount of disturbance allowed within the activity or project area (DDCT process). If current disturbance within the activity area or the anticipated disturbance from the proposed activity exceeds this threshold, the project should be deferred until such time as the amount of disturbance within the area has been reduced below the threshold through completed, monitored and verified restoration or management actions. If the project can be relocated so as to not have an impact on sage-grouse habitat or population, not exceed the disturbance cap, and still achieve objectives of the proposal, relocate the proposed activity and proceed with the appropriate process for review, decision and potential implementation. This step does not consider redesign of the project to reduce or eliminate direct and indirect impacts, but rather authorization of the project in a physical location that will not impact greater sage-grouse habitat or population.

#### Step 5 – Determine Authority and Apply Avoidance and Minimization Measures to Comply with Sage-Grouse Goals and Objectives

If the preliminary review of the proposal concludes that there may be impacts to sage-grouse habitat or population and the project cannot be effectively relocated to avoid these impacts, evaluate whether the agency, within agency’s rules and/or regulations, has the authority to modify or deny the project. If the



agency does not have the discretionary authority to modify or deny the proposal, proceed with the authorization evaluation process (NEPA) and work with the proponent to include appropriate mitigation elements that minimize impacts to sage-grouse habitat and populations and achieve compliance with sage-grouse objectives to the maximum extent possible under existing authority, including application of offset mitigation (Step 6) as allowable. Where the agency has the discretionary authority to modify or deny the proposal, proceed with the authorization evaluation process (NEPA) and include appropriate mitigation requirements that minimize impacts to sage-grouse habitat and populations to the extent possible and achieve compliance with sage-grouse objectives. Mitigation measures will often include a combination of several items such as lek buffers and timing of disturbance, noise restrictions, design modifications of the proposal, site disturbance restoration, post project reclamation, etc.

#### Step 6 – Apply Compensatory Mitigation or Reject / Defer Proposal

If the agency has the discretionary authority to deny the project and after careful screening of the proposal (Steps 1-5) has determined that direct and indirect impacts cannot be eliminated through avoidance or minimization, evaluate the proposal to determine if compensatory mitigation can be used to fully offset the remaining adverse impacts (while striving for conservation gain) and achieve sage-grouse goals and objectives. If the impacts cannot be effectively mitigated to these standards, reject or defer the proposal. Conditions resulting in this situation could include but are not limited to:

- The current population or habitat trends within the [insert appropriate scale of measurement] is downward and additional impacts, whether offset or not, could lead to further decline of the species population or habitat.
- The proposed offset mitigation is inadequate in scope or duration, has proven to be ineffective or is unproven (e.g., high risk) in terms of science-based approach.
- The project would impact habitat that has been determined to be a limiting factor for species sustainability.
- Other site specific information and analysis that determined the project would lead to a downward or negative change in the current species population trend or habitat and not comply with sage-grouse goals and objectives.

If, following application of available impact avoidance and minimization measures the project can be mitigated to fully offset (while striving for conservation gain) impacts to the species and comply with sage-grouse goals and objectives, proceed with the design of the mitigation plan, and NEPA analysis for the project.

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy to address greater sage-grouse impacts within that Zone. The WAFWA Management Zone Regional Mitigation Strategy will be applicable to the States/Field Offices/Forests within the Zone's boundaries. Subsequently, the BLM [name of Field Office]/USFS [name of Forest]'s NEPA analyses for implementation-level decisions, which have the potential to impact greater sage-grouse, will include analysis of mitigation recommendations from the relevant WAFWA Management Zone Regional Mitigation Strategy(ies).

Implementation of the Regional Mitigation Strategy may involve managing compensatory mitigation funds, implementing compensatory mitigation projects, certifying mitigation/conservation banks, and reporting on the effectiveness of those projects. These types of mitigation implementation actions may be most effectively managed at the State-level, in collaboration with partners. BLM State Office/USFS

Region may find it most effective to enter into an agreement with a State-level program administrator (e.g. a NGO, a State-level entity) to help manage these aspects of mitigation. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The Appendix [X] provides additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

**Brent Ralston**

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**From:** Bockting, Kelly  
**Sent:** Monday, October 20, 2014 9:49 AM  
**To:** Brent Ralston; Patricia Fosse; John Carlson; Cornelia Hudson  
**Subject:** meeting info  
**Attachments:** Metting info 10\_21\_14.docx

Attached you will find some info that I put together to try decipher differences between the IDSWMT ADPP and the MT GRSG Conservation Plan. This was not easy as the two documents are written so diffidently and the IDSWMT ADPP has so many appendices. I did my best to find what I could, but I am sure others have noted other concerns it they have take the time to review both documents also. Sorry for the late notice, let me know if you have questions.  
kb

**Kelly Bockting**  
**Wildlife Biologist**  
**Bureau of Land Management**  
**Dillon Field Office**  
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The following list is a few things I noticed in the MT GRSG conservation plan that may not be consistent with the ADPP:

- Stip #1, pg. 14. the 5% surface disturbance - wildfire IS included.
- Stip #2 pg. 14, NSO of 0.6 miles from lek including roads.
- Stip #3, pg. 14. seasonal use TL outside NSO are not consistent with dates and times used in Appendix B of IDSWMT ADPP. (pg 12 of the ADPP appendix)
- Stip #4, pg. 14. transportation, locate new roads 0.6 miles from leks, - the IDSWMT ADPP uses a BMP > 0.8 miles from nesting habitat for new paved or high traffic gravel roads??.
- Stip #6, pg. 15. overhead powerline siting > 0.6 miles and - IDSWMT used RDF not allowed <600meters, and BMP of 2 miles from lek in appendix A but Appendix B pg 4 of 17 states BMP of no new roads within .8 miles of leks.
- Stip #7, pg. 15. no noise increase over 10dBA above ambient, IDSWMT has an RDF of no repeated or sustained disturbance (ie. no noise level increase identified) For fluid mineral development RFD of 10 decibel increase above ambient is used. (pg. 7 appendix A)
- Stip #9 pg. 16. Sagebrush Eradication and Treatments, not sure what is included in "treatments", appears to be habitat restoration?
- Stip #10 pg. 16, Prescribed burns prohibited - no sagebrush habitat types identified that may be more suited to use of fire. Wildfires are included in the 5% disturbance cap. – IDSWMT ADPP habitat treatments, wildfire and conifer expansion are not included in the 5% disturbance. (pg. 5 appendix G)
- Stip # 11 pg.16. Monitoring and adaptive Response. – Uses a population trigger and the operator is to propose the adaptive management response?? - IDSWMT ADPP uses uses habitat based Adaptive Management.
- Stip #13 pg. 17. No net conifer expansion and recommends manual methods, and removal of all conifers <0.6 miles from leks.
- Stip #15, pg 17. Existing activities/disturbances are not subject to stipulations but the disturbance is calculated towards the disturbance cap and existing disturbance may exceed 5%.

General Habitat stip #1 Pg 19 NSO of 0.25 miles. – IDSWMT ADPP Appendix B (pg 3 of 17) lists research that states .25 and .6 buffers are not sufficient and uses a 2 mile buffer for structures in the anthropogenic catch all on pg. 8 of 17 (appendix C?)

\*Also of note in the MT GRSG Habitat Plan there is Lek Status definitions on pg 28 – not consistent with ID SWMT occupied lek definition.

These are just a few things that I have noticed, (some of which may not be an issue but probably need discussion.) There may be more that others have picked up on if they have reviewed both documents.

I think we need to review the following from the 96 page ADPP appendix. RDF/BMP's (11 pages) and the Buffer and Restriction tables (17 pages), and Appendix G for ID (H for MT?) (21 pages long.) to make sure they are consistent with the rest of MT.

Should discuss the Appendix J “Lands no longer available for disposal”

## Brent Ralston

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**From:** Brent Ralston  
**Sent:** Monday, October 20, 2014 2:24 PM  
**To:** Kurt Wiedenmann (kwiedenmann@blm.gov)  
**Subject:** FW: GrSG Key Issue Paper and Agenda for Monday  
**Attachments:** GRSB\_SD\_Prep\_morning\_agenda\_10\_15\_14.docx;  
GRSB\_BLM\_DOI\_coord\_afternoon\_agenda\_10\_15\_14.docx; GRSB\_Key\_Issues\_10\_17\_14.docx

Kurt,

Here is that email and here is the grazing language that we talked about.

- 1.1. RM-8: PHMA & IHMA - When an allotment becomes vacant or grazing preference is relinquished, consider voluntary retirement of the allotment or grazing preference in whole or in part, or converting the area to a forage reserve/buffer when doing so would maintain or enhance sage-grouse habitat. GHMA - When an allotment becomes vacant or grazing preference is relinquished, consider converting it to a forage reserve/buffer to use during fire rehabilitation or restoration efforts elsewhere, when such actions would result in a net benefit to GRSB habitat and other priority resources.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

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**From:** Timothy Murphy [mailto:tmurphy@blm.gov]  
**Sent:** Sunday, October 19, 2014 9:11 PM  
**To:** Jeffery Foss; Brent Ralston  
**Subject:** Fwd: GrSG Key Issue Paper and Agenda for Monday

I assumed, wrongly mind you, that Jeff was included in the addressing as in past material from Ed. Looking this over I think I'm prepared for the meeting tomorrow, Monday. 0900 to 1200 BLM, 1 - 4 BLM and DOI

Sent from my iPad

Begin forwarded message:

**From:** "Roberson, Edwin" <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** October 17, 2014 at 7:17:10 PM EDT  
**To:** James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>, "Perez, Jerome E" <[jperez@blm.gov](mailto:jperez@blm.gov)>, "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Jamie Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, "Simpson, Donald A" <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Ronald Dunton <[rdunton@blm.gov](mailto:rdunton@blm.gov)>, Michael Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>  
**Cc:** Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>, Neil Kornze <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, Kathryn Stangl <[kstangl@blm.gov](mailto:kstangl@blm.gov)>, Joe Stout <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>, Jessica

Camargo <[jcamargo@blm.gov](mailto:jcamargo@blm.gov)>, Jamie Harrison <[jharriso@blm.gov](mailto:jharriso@blm.gov)>, Joanne Maluotoga <[jmaluoto@blm.gov](mailto:jmaluoto@blm.gov)>, Judith Frye <[jfrye@blm.gov](mailto:jfrye@blm.gov)>, Annette Fournier <[afournie@blm.gov](mailto:afournie@blm.gov)>, Kathy Mondor <[kmondor@blm.gov](mailto:kmondor@blm.gov)>, Samuel Herbert <[sjherber@blm.gov](mailto:sjherber@blm.gov)>, Stella Portillo <[sportill@blm.gov](mailto:sportill@blm.gov)>, Toni Rohm <[trohm@blm.gov](mailto:trohm@blm.gov)>

**Subject: GrSG Key Issue Paper and Agenda for Monday**

Dear Sage-grouse SDs, Mike and Ron,

I am getting ready to go home for the day and wanted to send you the agenda and some more reading material for our discussions on Monday.

Joe sent you out three papers yesterday for your review. I have attached a paper that includes the 12 key remaining issues that were discussed last week in our meeting with the states representatives in Denver. The paper highlights each issue and provides either the direction we will proceed with or recommendations for discussion and decision. The paper also has 5 attachments including: a Disturbance white paper, GrSG Land use plan objectives guidance, guidance for incorporating GrSG RMP decisions into grazing authorizations, an updated draft planning schedule, and a paper on the roles and responsibilities for a GrSG strike team process with steps to get us to the ROD. The discussion in the morning will help us prepare for the afternoon meeting.

As the first agenda shows, we will discuss these on Monday morning between 9 and 12. Then we will go to lunch and meet up with Sarah, Jim and Bret. The afternoon provide time for Sarah and Jim to discuss the status of the one-on-one meetings with the states; to share with Sarah, Jim and Bret where BLM is with the 12 remaining key issues; and to have a discussion about next steps. This is where we will discuss the planning schedule, strike teams, our approach on the input into the conservation efforts data base and stakeholder outreach.

Hopefully Sarah, Jim and Bret will be able to hang around for dinner and some social time with our ELT members before returning to DC. But that is not the end of our fun GrSG day. Amy and I want to meet with you all again after dinner for a discussion related to Plan Implementation. Our resources DSDs met a few weeks ago on this and we need to discuss some key aspect of implementation and begin to make some key decisions about approaches. On Monday morning we will hand out some information developed by the DSDs to help us focus our discussion on what the plan implementation workload will be and to help us discuss how to organize it. I know that you all will be tired at the end of the day. Unfortunately there's no rest in sight for a while. Monday will help us insure we are all in alignment and on the page as we move to completion of our proposed plans, then to the signing of the RODs and finally to implementing the plans effectively across the range.

Thank you all for all you and your teams have done to date. See you Monday. ed

GREATER SAGE GROUSE MEETING  
NATIONAL CONSERVATION TRAINING CENTER  
SHEPHERDSTOWN, WV  
OCTOBER 20, 2014  
BLM/DOI Coordination  
1:00pm – 5:00pm

Meeting objective : To discuss BLM's approach on the remaining GRSG key issues and reach agreement on a path forward and next steps.

- |                    |   |
|--------------------|---|
| 12:00 pm – 1:00 pm | Lunch with Department   |
| 1:00 pm            | Welcome and meeting objectives – Neil and Steve   |
| 1:15 pm – 2:00 pm  | Update on one-on-one state meetings – Sarah Greenberger, Jim Lyons and Bret Birdsong  |
| 2:00 pm – 3:30 pm  | Review of BLM's approach to Key Issues – Ed <ul style="list-style-type: none"><li>• Disturbance</li><li>• Mitigation</li><li>• Adaptive Management</li><li>• Vegetative Objectives</li><li>• Livestock Grazing</li><li>• Allocations (ROWs, Corridors, Mineral Materials)</li><li>• NSO language for fluids</li><li>• Smart from the start (conservation objective for leasing and development)</li><li>• Coal Suitability</li><li>• Mapping (PAC boundaries)</li><li>• Political Boundary Issues</li><li>• Buffers</li></ul> |
| 3:30 pm            | Break   |
| 3:45 – 5:00 pm     | Next Steps – Ed <ul style="list-style-type: none"><li>• Planning Schedule/Strike Team</li><li>• Plan Consistency</li><li>• Conservation Efforts Database</li><li>• Stakeholder Outreach</li></ul>   |
| 5:00 pm            | Closing Remarks/Adjourn – Neil and Steve  |



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## GRSG Planning - Key Remaining Issues

- Issue: Disturbance  
Direction: Per the original April 2014 NPT guidance on disturbance, all states will use the 3% disturbance cap, with the exception of WY which is 5%. See [Attachment 1](#) for the appropriate scales, methodology for calculating disturbance, and recommended ADPP drop-in language.
- Issue: Mitigation  
Direction: 1) Consistent with the Mitigation Framework which is to be incorporated into all ADPPs as an appendix, the following language should also be incorporated as a proposed plan management action under Special Status Species (GRSG) (excluding Wyoming ADPPS):
- “A net conservation gain to the greater sage-grouse will be achieved by implementing restoration conservation actions outlined in this proposed plan [or amendment], applying a no net unmitigated loss standard for authorized land uses in all GRSG habitat [mention all areas that make up GRSG habitat: PHMA, GHMA, IHMA, and/or Core], and, strategically siting compensatory mitigation actions, via a WAFWA Management Zone Regional Mitigation Strategy as part of a mitigation program in order to achieve cumulative benefits (as outlined in [Appendix X]).”
- As defined in the Mitigation Framework Appendix – “No net unmitigated loss means that impacts from implementation level actions will fully offset to benefit the species. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.”
- Issue: Adaptive Management (Highlighted Areas = other potential options/recommendations to consider)  
Recommendation: 1. Wyoming BLM: All remaining WY ADPPs will follow the NPT Adaptive Management guidance and sideboards (WY BLM has proposed Buffalo, Bighorn Basin, and the WY 9 Plan ADPPs to incorporate the Wyoming GRSG Adaptive Management Plan that has been developed by the BLM, FS, USFWS, and WGFD and is also being applied to the Lander planning area). BLM WY’s hard trigger response is provided below:
- “Upon determination that a hard trigger has been tripped, the BLM and FS will immediately defer issuance of permits for new actions with the potential to adversely affect Greater Sage-Grouse. Within 14 days of a determination that a hard trigger has been tripped, the Adaptive Management Working Group will convene and initiate an assessment to determine the causal factor or factors (hereafter called the causal factor

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assessment). The management agency (BLM and/or FS) and adaptive management group will implement an interim response strategy to direct management until causal factors and appropriate responses can be determined. Recommendations of the adaptive management working group will be implemented immediately through the means most appropriate to the agencies in question. This may include cessation of activities or implementation of measures analyzed in this EIS, if supported by the best available science. The causal factor assessment will be completed within 180 days of initiation. Once the causal factor assessment is completed by the Adaptive Management Working Group, the interim response strategy will be modified appropriately. If a causal factor or factors cannot be identified, the interim response strategy shall stay in place until such time a long-term management or planning document can be implemented.”

2. Idaho BLM: will maintain the adaptive management strategy outlined in their DEIS, as a result of their three tiered habitat approach (PHMA, GHMA, and IHMA).

3. All other sub-regions are to follow the NPT Adaptive Management Guidance and Sideboards.

4. Inconsistencies related to varying adaptive management triggers and responses across jurisdictional boundaries will be resolved by the WAFWA Manage Zone Working Groups.

Issue: Vegetation Objectives

Direction: 1) Establish and incorporate vegetative objectives into all ADPPs that do not currently have them, following FS Table 2-6 (habitat objectives). See [Attachment 2](#) for specific guidance and table template.  
2) Vegetation objects that relate directly to Special Statuse Species (SS) should be in the SS section of the ADPP and pure vegetative objectives should be in the Vegetation section of the document.

Issue: Livestock Grazing Modifications

Direction: 1) The following should be included in the Livestock Grazing section of the ADPPs.

- The BLM will prioritize the modification of grazing permits within GRSG habitat. In setting priorities, areas not meeting land use plan vegetation objective and/or Land Health Standards will take precedence.
- The NEPA analysis for proposed modification of livestock grazing permits/leases will include a range of alternatives that allows the authorizing officer to make adjustments to livestock grazing

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without conducting additional NEPA and issuance of a proposed/final grazing decision.

- Allotments within GRS habitat will be prioritized for annual review to ensure compliance with the terms and conditions within the grazing permits. When BLM conducts monitoring at a minimum, actual use, utilization, and use supervision data will be collected.

2) See [Attachment 3](#) as to how BLM will incorporate GSGR decisions from the Sage-Grouse RMP/Amendments into grazing permits/leases.

Issue:

High-voltage Transmission and Major Pipeline ROWs and Corridors

Direction:

1) All sub-regions will apply the recommended NPT allocation guidance for PHMA and GHMA.

2) For sub-regions that have planned priority transmission lines that traverse their planning area (TransWest Express, Gateway South, Gateway West, and Boardman to Hemingway), they will apply the following language as a management action in your sub-regional ADPP:

“Priority Habitat Management Areas (PHMAs) and General Habitat Management Areas (GHMAs) are designated as avoidance areas for high voltage transmission line ROWs. All authorizations in these areas must comply with the RDFs and avoidance criteria presented in [\[insert citation here\]](#) of this document. The BLM is currently processing an application for [\[Insert name of transmission project\]](#) and the NEPA review for this project is well underway. This project will include GRS mitigation measures that the BLM is in the process of analyzing through the project’s NEPA review process, therefore these projects would not be subject to the following avoidance criteria and RDFs outlined in this document [\[list the criteria/RDFs\]](#).”

3) UT will not designate corridors (will use WY model, closing all of the PHMA in question except for the route of an existing powerline).

Issue:

Mineral Materials (Salable Minerals)

Direction:

The original NPT Allocation language related to mineral materials has been modified. The following management action should be applied to all ADPPs as follows:

“PHMAs will be closed to new mineral material sales. However, these areas would remain “open” to free use permits and the expansion of existing active pits, only if the following criteria is met:

- the activity is within the BSU and project area disturbance cap;

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- the activity is subject to no net unmitigated loss;
- the activity applies all applicable required design features; and
- the activity clears the specific sub-regional screening criteria.”

With the exception of Wyoming ADPPs, all other sub-regions will adopt the above this modified NPT guidance language as a management action.

Issue: No Surface Occupancy (NSO) Exception and Modification Language  
Direction: Sub-regional ADPPs for both the Rocky Mountain and Great Basin will include the following NSO language into their ADPPs:

“A modification or exception may only be considered where the proposed action is determined to be in non-habitat, the area is not used by GRSG, and the proposed action would not have direct, indirect, or cumulative effects to GRSG or its habitat. The determination would be made by the BLM in consultation with a team of agency GRSG experts, including an expert from the state wildlife agency, USFWS, and BLM/FS. The State Director must have received a determination before approving any modification or exception. All modifications or exceptions must be approved by the State Director.

Issue: Fluid Mineral Resource Allocation (Including Geothermal)  
Direction: SMART from the START – All ADPPs will include the conservation objective for leasing and development outside of PHMAs, similar to what was included in the Lander ROD:

“In order to avoid surface-disturbing activities in PHMAs, priority will be given to leasing and development of oil and gas and other mineral resources outside of PHMAs, subject to applicable stipulations and valid existing rights. When analyzing leasing and authorizing development of oil and gas and other mineral resources in PHMAs, subject to applicable stipulations for the conservation of greater sage-grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for greater sage-grouse.”

Issue: Coal Suitability  
Direction: 1) ADPPs cannot "close" areas to coal leasing to protect Sage-grouse without going through the suitability process. The suitability determinations in the previous plan (existing management) – and any open/closed allocation decisions for coal leasing based on past determinations – would remain in place.  
2) Sub-regions will include a management action that states:

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“At the time an application for a new coal lease or lease modification is submitted to the BLM, the BLM will determine whether the application area is “suitable” or “unsuitable” for coal leasing. During this process, portions of the application area may not be considered for leasing if leasing is proposed in PHMAs or GHMAs and is likely to have a direct, indirect, or cumulative effect on GRSG or its habitat .”

Issue: Mapping

Direction: 1) NV (in agreement with the State) will use the Coates map to redraw the PACs.  
2) UT will manage non-habitat (Opportunity Areas) as PHMA. All habitats in PACs will be managed as PHMA. Anthro and West Tavaputs will be managed as PHMA.

Issue: Buffers

Direction: Best available science – USGS is currently in the process of facilitating a literature review of the science associated with all buffers identified in the plans. This literature review will be followed by a peer review process. If a buffer distance is not supported by the best available science, this information will be considered in the relevant plan revision or amendment when undergoing WO strike team review.

Issue: Schedule

Direction: Final ADPP allocation data needs to be submitted to the NOC no later than October 31<sup>st</sup>.

For the full proposed GRSG Planning Schedule, see [Attachment 4](#).

Issue: GRSG Washington Office Strike Team

Direction: GRSG strike team will include a consistency review team that reviews the documents prior to Washington Office review/kick-off. This team will also participate in development of the Record of Decisions. See [Attachment 5](#) for GRSG Strike Team Roles and Responsibilities. The GRSG Washington Office Strike Team will:

- Ensure National Policy Team guidance and management direction is consistently incorporated into the GRSG Proposed Plans/Amendments
- Ensure that the Proposed Plans/Amendments include the appropriate conservation framework and objectives
- Ensure the plans collectively result in a cohesive federal land management conservation strategy for the GRSG
- Ensure consistency with the Record of Decisions

Issue: Plan Consistency

Recommendation: 1) All ADPP amendments will use the Chapter 2 Template provided to the State Directors on October 1, 2014.  
2) The ADPP revisions will use a consistent approach for consolidating all related GRSG proposed management actions in one similar location in the ADPPs. WO-210, BLM Wyoming, and BLM Montana are in the process of developing this approach.

## Attachment 1 – Disturbance White Paper

### Greater Sage -Grouse (GRSG) Land Use Plan Disturbance Cap

#### Purpose

- I. Provide the planning units with land use planning actions that need to be incorporated into the administrative draft proposed plans to respond to the 3% disturbance cap once it is exceeded in either the Biologically Significant Units (BSU) or at the project scale.
- II. Provide guidance on the use of the west-wide habitat degradation (disturbance) data layers as well as the use of locally collected disturbance data for BSUs to determine if the disturbance cap has been exceeded as the land use plans (LUP) are being implemented.
- III. Provide guidance on the use locally collected disturbance data for project authorizations to determine if the disturbance cap has been exceeded as the LUPs are being implemented.
- IV. Provide guidance on the inclusion of fire in disturbance calculations.
- V. Provide guidance on the use of the density of energy and mining facilities during authorizations
- VI. Provide guidance on the use of the BER data in the land use plans and the use of the west-wide sagebrush availability and habitat degradation estimates for the Priority Habitat Management Areas in each population for management purposes as the LUPs are being implemented.

#### Guidance

- I. Planning units (except in Wyoming) will include the following land use plan actions within their administrative draft proposed land use plans (ADPPs) that states:
  - a. If the 3% anthropogenic disturbance cap is exceeded on all lands (regardless of ownership) within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, then no further discrete anthropogenic disturbances will be permitted by BLM within GRSG Priority Habitat Management Areas in any given Biologically Significant Unit until the disturbance has been reduced to less than the cap.
  - b. If the 3% disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area, then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to valid existing rights).
- II. Use of west-wide habitat degradation data well as the use of locally collected disturbance data to determine the level of existing disturbance:
  - a) In the GRSG Priority Habitat Management Areas in any given Biologically Significant Unit, use west-wide data at a minimum and/or locally collected disturbance data as available for the anthropogenic disturbance types listed in Table 1.
- III. Use of locally collected disturbance data for project authorizations:
  - a) In a proposed project analysis area, digitize all existing anthropogenic disturbances identified in the GRSG Monitoring Framework and the 8 additional features that are

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considered threats to sage-grouse (see below) using 1 meter resolution NAIP imagery. Use local data if available.

- b) Existing disturbance will be calculated in Wyoming using the Density and Disturbance Calculation Tool (DDCT). This tool along with the State of Wyoming's Core Area Strategy allows for the use of a 5% disturbance cap.
- IV. Fire-burned and habitat treatment areas will not be included in the project scale disturbance calculation for managing sage-grouse habitat under a disturbance cap. These areas will be considered part of a sagebrush availability when rangewide, consistent, interagency fine- and site-scale monitoring has been completed and the areas have been determined to meet sage-grouse habitat requirements. These and other disturbances identified in Table 3 will be part of a sagebrush availability evaluation and will be considered along with other local conditions that may affect sage-grouse during the analysis of the proposed project area.
- V. Planning units are directed to include a cap related to the density of energy and mining facilities (listed below) during project scale authorizations. If the disturbance density in a proposed project area is less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area.
- Energy (oil and gas wells and development facilities)
  - Energy (coal mines)
  - Energy (wind towers)
  - Energy (solar fields)
  - Energy (geothermal)
  - Mining (active locatable, leasable, and saleable developments))
- VI. Planning units are directed to continue using the baseline data from the 2013 USGS Baseline Environmental Report (BER) in the proposed plans/ FEISs. The BER reported on individual threats across the range of sage-grouse while the west-wide disturbance calculation consolidated the anthropogenic disturbance data into a single measure using formulas from the GRSG Monitoring Framework. These calculations will be completed on an annual basis by the BLM's National Operation Center. Planning units will be provided the 2014 baseline disturbance calculation derived from the west-wide data once the RODs are signed that describe the Priority Habitat Management Areas.



Additional Information/Formulas

Disturbance Calculations for the BSUs and for the Project Analysis Areas:

- For the BSUs: % Disturbance = (combined acres of the 12 degradation threats\*) ÷ (acres of all lands within the PHMA s in a BSU) x 100.
- For the Project Analysis Area: % Disturbance = (combined acres of the 12 degradation threats \* plus the 8 site scale threats\*\*) ÷ (acres of all lands within the project analysis area) x 100.

\* see Table 3 \*\* see Table 2

Project analysis area method for permitting surface disturbance activities:

- Draw the project analysis area polygon which consists of a 4 mile buffer around the proposed project footprint plus areas intersected by any 4 mile buffers from nearby leks or mapped seasonal habitats.
- Digitize disturbances, include burned areas if deemed acceptable, from NAIP imagery or use locally available data.
- Calculate percent existing disturbance using the formula above. If existing disturbance is less than 3%, proceed to next step. If existing disturbance is greater than 3%, defer the project.
- Add proposed project disturbance footprint area and recalculate the percent disturbance. If disturbance is less than 3%, proceed to next step. If disturbance is greater than 3%, defer project.
- Calculate the disturbance density of energy and mining facilities (listed above). If the disturbance density is less than 1/ 640 acres, proceed to the NEPA analysis incorporating mitigation measures into an alternative. If the disturbance density is greater than 1/ 640 acres, either defer the proposed project or co-locate it into existing disturbed area.

Table 1. Anthropogenic disturbance types for disturbance calculations. Data sources are described for the west-wide habitat degradation estimates (Table copied from the GRSG Monitoring Framework)

Degradation Type	Subcategory	Data Source	Direct Area of Influence	Area Source
Energy (oil & gas)	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
Energy (coal)	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery

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Energy (wind)	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
Energy (solar)	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
Energy (geothermal)	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
Mining	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
Infrastructure (roads)	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
Infrastructure (railroads)	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
Infrastructure (power lines)	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
Infrastructure (communication)	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300

Table 2. The eight additional features to include in the disturbance calculation at the project scale

- |   |
|---|
| <ol style="list-style-type: none"> <li>1. Underground Pipelines</li> <li>2. Coalbed Methane Ponds</li> <li>3. Meteorological Towers</li> <li>4. Nuclear Energy Facilities</li> <li>5. Airport Facilities and Infrastructure</li> <li>6. Military Range Facilities &amp; Infrastructure</li> <li>7. Hydroelectric Plants</li> <li>8. Recreation Areas Facilities and Infrastructure</li> </ol> |
|---|

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Table 3. Relationship between the 18 threats and the three habitat disturbance measures for monitoring and disturbance calculations.

USFWS Listing Decision Threat	Sagebrush Availability	Habitat Degradation	Energy and Mining Density
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

### Background

In the USFWS’s 2010 listing decision for sage-grouse, the USFWS identified 18 threats contributing to the destruction, modification, or curtailment of the sage-grouse’s habitat or range (75 FR 13910 2010). In April 2014, the Interagency GRSG Disturbance and Monitoring Sub-Team finalized the Greater Sage-Grouse Monitoring Framework (hereafter, framework) to track these threats. The 18 threats have been aggregated into three measures to account for whether the threat predominantly removes sagebrush or degrades habitat. The three measures are:

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- Measure 1: Sagebrush Availability (percent of sagebrush per unit area)
- Measure 2: Habitat Degradation (percent of human activity per unit area)
- Measure 3: Density of Energy and Mining (facilities and locations per unit area)

The BLM is committed to monitoring the three disturbance measures and reporting them to the FWS on an annual basis. However, for the purposes of calculating the amount of disturbance to provide information for management decisions and inform the success of the sage-grouse planning effort, the data depicting the location and extent of the 12 anthropogenic types of threats will be used at a minimum in the BSUs and those same 12 anthropogenic and the additional 8 types of features that are threats to sage-grouse will be used in the project analysis areas.

Broad/Mid-Scale (Population)	Intermediate Scale (BSU)	Local/Project (Seasonal Habitat)
<b>Habitat Degradation</b>	<b>Habitat Degradation</b>	<b>Habitat Degradation</b>
Unit: WAFWA Populations	Unit: Biologically Significant Unit	Unit: WAFWA Populations
Area of Interest: PHMAs	Area of Interest: PHMAs	Area of Interest: Project Area or Seasonal Hab.
Data: Westwide degradation data	Data: Westwide <sup>2</sup> , State, Local	Data: State, Local
Formula: 12 Degradation Threats	Formula: 12 Degradation Threats	Formula: 12 Degradation Threats + 8 <sup>7</sup>
(Measure 2a): PHMAs in Populations	(Measure 2a): PHMAs in BSUs	Project/Local Habitat Area <sup>6</sup>
Management: Internal BLM & FS estimates	Management: 3% <sup>3</sup> Cap, Adapt Mgmt <sup>4</sup>	Management: 3% <sup>3</sup> Disturbance Cap
All Lands: Yes	All Lands: Yes	All Lands: Yes
Fire Included: No	Fire Included: No	Fire Included: No
Who: BLM NOC	Who: BLM NOC <sup>5</sup> or State Offices	Who: State Offices or Field Offices
<b>Sagebrush Availability</b>	<b>Sagebrush Availability</b>	<b>Energy and Mining<sup>1</sup></b>
Unit: WAFWA Populations	Unit: Biologically Significant Unit	Unit: Biologically Significant Unit
Area of Interest: PHMAs	Area of Interest: PHMAs	Area of Interest: PHMAs or Project or seas
Data: LANDFIRE Updated EVT	Data: Updated EVT or State data	Data: Westwide <sup>2</sup> , State data
Formula: Existing Updated Sagebrush	Formula: Existing Updated Sagebrush	Formula: Well Pads and Mines
(Measure 1a): PHMAs in Populations	(Measure 1a): PHMAs in BSUs	(Measure 3): Square Mile
Management: Internal BLM& FS estimates	Management: Adaptive Management <sup>4</sup>	Management: Project Authorization
All Lands: Yes	All Lands: Yes	All Lands: Yes
Fire Included: Yes	Fire Included: Yes	Fire Included: No
Who: BLM NOC	Who: BLM NOC <sup>5</sup> or State Offices	Who: BLM NOC or State Offices
<b>Energy and Mining<sup>1</sup></b>	<b>ACRONYMS &amp; NOTES:</b>	
Unit: WAFWA Populations	PHMA = Priority Habitat Management Area; EVT = Existing Vegetation Type; BbS = Areas of Biotic Potential; BSU = Biologically Significant Unit	
Area of Interest: PHMAs	<sup>1</sup> Only mines with a Plan of Operation (>5 acres of disturbance) will be included.	
Data: Westwide well & mine data	<sup>2</sup> Westwide data will be used only if state or local data are not available.	
Formula: Well Pads and Mines	<sup>3</sup> A 5% disturbance cap will be allowed in Wyoming only.	
(Measure 3): Square Mile	<sup>4</sup> This will be one of several variables used to inform Adaptive Management.	
Management: Internal BLM & FS estimates	<sup>5</sup> A moving window analysis will be conducted at this scale by the NOC using westwide data. If available, state and local data / analysis should be used for Adaptive Management.	
All Lands: Yes	<sup>6</sup> The analysis area will be based on a 4-mile project area, 4-mile buffers around lek/s/ lek complexes, or other seasonal habitat, and clipped to sage-grouse habitat and PHMA (DDCT methodology).	
Fire Included: No	<sup>7</sup> See Table 2 within Additional Information/Formulas	
Who: BLM NOC		

## Attachment 2: Greater Sage-Grouse (GRSG) Land Use Plan Vegetation Objectives

### Greater Sage -Grouse (GRSG) Land Use Plan Vegetation Objectives

After reviewing the vegetation objectives from the current ADPPs and recognizing the wide variation between objectives in the plans, and due to the concern by the FWS about consistency across the land use plans, the following describes a process to gain consistent objectives across the range of sage-grouse while recognizing the unique ecological sites and vegetation characteristics in the planning areas.

#### Purpose

- I. Provide the planning units with template language for a land use planning vegetation objective to be incorporated into the administrative draft proposed plans (ADPP).
- II. Provide guidance on the use of a template for Greater Sage-Grouse (GRSG, sage-grouse) habitat objectives in the Special Status Species section of the ADPPs.
- III. Provide guidance on the use of the vegetation and sage-grouse habitat objectives during land health assessments.

#### Background

Vegetation objectives from the current ADPPs have been reviewed and were found to have a wide variation among the plans. Some ADPPs contain vegetation and habitat objectives similar to the direction and template provided above. Some ADPPs contain measurable objectives based on mapped conditions within the planning area. Some ADPPs make a commitment to develop specific objectives through the NEPA process for permit renewals. Several ADPPs refer to using the standards in the Sage-Grouse Habitat Assessment Framework as their objectives and it is recognized that the HAF gives the BLM the tools to make informed decisions about the suitability of sage-grouse habitat through interpretation of the relationships between all the habitat measures and objectives as well as other factors and uses appropriate measures at appropriate scales. This wide variation in vegetation objectives will make it very difficult for the FWS to be able to look across the range. The direction contained in this guidance will resolve this issue.

#### Guidance

- I. Planning units will include the following land use plan vegetation objectives within the Vegetation section of their administrative draft proposed land use plans (ADPPs) that states:
  - a. In all Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover (Aldridge et al. 2008, Doherty et al. 2010, Wisdom et al. 2011). Maintain ecological processes as described in BLM Technical Reference 1734-6 “Interpreting Indicators of Rangeland Health” (Pellant et al. 2005) to sustain these habitats.

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BLM has identified lands across the range of sage-grouse capable of producing 10-30% sagebrush canopy cover. The Final EIS will identify the Priority Habitat Management Areas and will include an objective to maintain the desired condition of 10-30% sagebrush canopy cover in a minimum of 70% of those lands.

- II. Planning units will populate the attached template to provide fine- and site-scale vegetation objectives for sage-grouse life history stages based on the ecology in your region. This template should be included in the Special Status Species section of the ADPP. Provide appropriate peer-reviewed science to support the habitat values for the indicators.

Fine- and site-scale sage-grouse habitat suitability indicators for seasonal habitats are identified in the Sage-Grouse Habitat Assessment Framework (HAF). The HAF has incorporated the Connelly et al. (2000) sage-grouse guidelines as well as many of the core indicators in the AIM strategy (Toevs et al. 2011). There may be a need to develop adjustments to height and cover or other site suitability values described in the HAF; any such adjustments should be ecologically defensible. To foster consistency, however, adjustments to site suitability values at the local scale should be avoided unless there is strong, scientific justification for making those adjustments. That justification should be provided. WAFWA Management Zone adjustments must be supported by regional plant productivity and habitat data for the floristic province. If adjustments are made to the site-scale indicators, they must be made using data from the appropriate seasonal habitat designation (breeding/nesting, brood-rearing, winter) collected from sage-grouse studies found in the relevant area and peer-reviewed by the appropriate wildlife management agency(ies) and researchers

ATTRIBUTE	INDICATORS	DESIRED CONDIT ION	Refer ence
<b>BREEDING AND NESTING</b> (Seasonal Use Period March 1-June 15 )			
Lek Security	Proximity of trees		
	Proximity of sagebrush to leks		
Cover	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover		
	Sagebrush height		
	Arid sites		
	Mesic sites		
	Predominant sagebrush shape		
	Perennial grass cover		
	Arid sites		
Mesic sites			
Perennial grass height			
Perennial forb canopy cover			
Arid sites			
Mesic sites			
<b>BROOD-REARING /SUMMER<sup>1</sup></b> (Seasonal Use Period June 16 -October 31)			
Cover	% of Seasonal habitat meeting desired condition		

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	Sagebrush canopy cover		
	Sagebrush height		
	Perennial grass canopy cover and forbs		
	Riparian areas/mesic meadows		
	Upland and riparian perennial forb availability		
WINTER <sup>1</sup> (Seasonal Use Period November 1 -February 28 )			
Cover and Food	% of seasonal habitat meeting desired conditions		
	Sagebrush canopy cover above snow		
	Sagebrush height above snow		

- III. Field offices are to conduct land health assessments at the watershed or comparable, larger scale and use the LUP vegetation objective and the sage-grouse habitat objectives to determine if GRSG habitat is meeting the desired condition.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (IIRH, Pellant et. al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in sage-grouse habitat, the BLM should collect the sage-grouse habitat-specific data to inform the HAF indicators that may not have been collected using the IIRH or the Core Indicators methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat.

## Attachment 3: Incorporating GSGR RMP Decisions into Grazing Authorizations

### Incorporating GSGR RMP Decisions into Grazing Authorizations

#### Purpose

The purpose is to provide recommended ADPP language and outline the process for prioritizing the modification of grazing permits/leases, provide for adjusting livestock grazing within the terms and conditions of permits, and accomplish annual compliance monitoring within GRS habitat.

#### Background

The BLM manages approximately 18,000 livestock grazing permits and leases on the public lands. Livestock grazing is an integral part of the BLM multiple use mission and is authorized by the Taylor Grazing Act (1934), the Federal Land Policy Management Act (1976) and the Public Rangeland Improvement Act (1978). By regulation, grazing leases and permits are normally issued for 10-year periods. Annually, a range of 1,200 to 3,200 grazing permits expire and the BLM receives 500 to 1,500 grazing permit/lease transfer requests.

The BLM currently issues permits/leases in accordance with either:

- All applicable law, regulation, policy (NEPA, consultation, proposed/final grazing decision-also known as a fully processed permit); or
- Appropriation authority (Section 411, PL 113-76-for permits that the BLM is unable to fully process before their expiration).

Congress has acted to ensure that grazing permittees could continue to graze if the BLM is unable to complete the environmental analysis mandated by the NEPA and other applicable laws. Since 1999, a provision (“the rider”) has been included in the Interior Appropriations bill that, in various forms, generally authorizes the BLM to renew grazing permits and leases under their same terms and conditions until it fully processes the permit renewal in compliance with NEPA, ESA, and other legal or regulatory requirements. The most recent rider is contained in Section 411, Public Law 113-76.<sup>1</sup> The rider relieves the BLM’s renewal processing workload while allowing the BLM to prioritize permit processing based on sensitivity of the resources at issue.

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<sup>1</sup> The Consolidated Appropriations Act, 2014 includes the provision Section 411 which states: “Section 415 of division E of Public Law 112–74 is amended by striking “and 2013” and inserting “through 2015”. The terms and conditions of section 325 of Public Law 108-108 (117 stat. 1307), regarding permits at the Department of the Interior and the Forest Service, shall remain in effect through fiscal year 2015. A grazing permit or lease issued by the Secretary of the Interior for lands administered by the Bureau of Land Management that is the subject of a request for a grazing preference transfer shall be issued, without further processing, for the remaining time period in the existing permit or lease using the same mandatory terms and conditions. If the authorized officer determines a change in the mandatory terms and conditions is required, the new permit must be processed as directed in section 325 of Public Law 108-108.” Where a FO is unable to fully process a permit renewal in compliance with all applicable laws prior to the permit expiration, Section 411 extends the authority to renew the grazing permit with the same terms and conditions as the expiring permit. Section 325 provides the process for authorizing grazing until a permit or lease is issued in compliance with all applicable law and regulatory processes.



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The BLM may modify terms and conditions of a permit or lease following consultation, cooperation, and coordination<sup>2</sup> with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public. Under 43 C.F.R. 4160.1, the BLM must serve a proposed decision on any affected applicant, permittee or lessee, any agent and lien holder of record, and interested public who is affected by the proposed actions, terms or conditions, or modifications relating to applications, permits and agreements (including range improvement permits), or leases.

A. Recommended Language to be incorporated as Livestock Grazing Management Actions within the GRSG ADPPs:

- The BLM will prioritize the modification of grazing permits within GRSG habitat. In setting priorities, areas not meeting land use plan vegetation objective and/or Land Health Standards will take precedence.
- The NEPA analysis for proposed modification of livestock grazing permits/leases will include a range of alternatives that allows the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA and issuance of a proposed/final grazing decision.
- Allotments within GRSG habitat will be prioritized for annual review to ensure compliance with the terms and conditions within the grazing permits. When BLM conducts monitoring, at a minimum, actual use, utilization, and use supervision data will be collected.

Process for Modifying Grazing Permits to Meet GRSG RMP Amendments/Revisions Objectives

If an evaluation area includes GRSG habitat that will require the modification of a grazing permit, the BLM will prepare the appropriate NEPA analysis and issue the proposed/final grazing decision under 43 C.F.R. Subpart 4160, subject to administrative appeal and potential judicial challenge.

BLM will develop criteria to prioritize the workload to modify grazing permits (fully processed or rider) within GRSG habitat. In setting priorities, areas not meeting Land Health Standards (43 C.F.R. 4180) will take precedence. Potential examples for prioritizing permit modifications could include:

- Was current livestock grazing identified as a causal factor for not meeting Land Health Standards?
- Since the last allotment/watershed evaluation, is there current monitoring information to determine that the watershed/allotment is currently achieving or making significant progress towards achieving land health standards?
- Does the permit have terms and conditions adequate to ensure proper grazing practices to meet land use plan GRSG Special Status Species habitat objectives?
- Is there data that indicates that land use plan GRSG Special Status Species habitat objectives are being met?
- Is there a request from the permittee to modify the terms and conditions of his/her permit?

The NEPA analysis will include adaptive management options when the GRSG Special Status Species habitat objectives are not being met. The NEPA analysis on the proposed modification of the

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<sup>2</sup> 43 CFR 4130.3-3 states: Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 (Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration).

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permit/lease should include a range of alternatives that allows the authorized officer to make the following adjustments to livestock grazing without additional NEPA or issuance of a proposed/final grazing decision. Implementation of management actions to meet seasonal Sage-Grouse habitat requirements could include:

- Season or timing of use;
- Numbers of livestock (includes temporary non-use or livestock removal);
- Distribution of livestock use;
- Intensity of use; and
- Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats).

B. Annual Compliance Monitoring of Modified Grazing Permits.

Allotments within GRSG habitat will be prioritized for annual monitoring to ensure compliance with the terms and conditions in the permits. The BLM will collect, at a minimum, the following monitoring data:

- Actual Use
- Utilization
- Use Supervision

## Attachment 4 – National GRSG Planning Schedule

### Schedule Assumptions

1. Modifications made to the ADPPs from roll-up and state meetings will not impact sub-regions from being able to submit their final ADPP data to the NOC by October 31, 2014.
2. All ADPP data submitted to the NOC by October 31, 2014 has been properly QAed/QCed by the BLM States.
3. The WO has the capacity to review all 15 Draft FEISs in 2 weeks.
4. Smooth Protest Resolution process.
5. No appeals from the governor’s consistency review.
6. All plans will go forward with informal Section 7 Consultation (30 days). If formal Section 7 Consultation is need, 135 days would be needed. This consultation would be initiated between steps 9 and 10.

National GRSG Planning Schedule			
Key Milestones are highlighted in red			
Step #	Roll-up/Planning 12 Step Process	Dates	Assumptions/Notes
1	Sub region sends memo to AD 200 for review	Complete	
2	AD 200 reviews memo and contacts sub regional SD.	Complete	
2a	Sub regions send ADPP data to the NOC.	Complete	
3	NOC completes WAFWA MZ Tier II CEA MZ tables	ON HOLD	NOC needs 1 month
3a	NOC completes WAFWA MZ Roll up land use allocation maps	Complete	
3b	EMPSi completes Tier II CEA MZ analysis and sends analysis to sub-regions	ON HOLD	6-10 weeks
4G	Great Basin Federal Family Roll up review meetings	Complete	
4R	Rocky Mountain Federal Family Roll up review meetings	Complete	
5	Meeting with States on Final Federal Plans (Face-to-Face)	10/13/14 to 10/17/14	
6	Final Resolution of Federal Plans (State Director’s meeting)	10/20/14	
7	Secretaries of DOI and USDA Briefing	10/22/14	
	Sub-regions complete ADPP and Chapter 2	10/31/14	
	Sub-regions re-send ADPP data to the NOC, reflecting changes from FFM s, discussions with the States, and from interagency leadership briefings	10/31/14	
3	NOC completes WAFWA MZ Tier II CEA MZ tables	11/21/14	3 weeks  Assumes all data has been appropriately QAed/QCed
3b	EMPSi completes Tier II CEA MZ analysis and sends analysis to sub-regions	11/21/14 to 1/2/15	6 weeks
	Direct and Indirect impact analysis is completed for the proposed plan	10/31/14 to 12/3/14	5 weeks
	BLM/FS ID-teams review of impact analysis (for those planning efforts using contractors only)	12/3/14 to 12/17/14	2 weeks
	BLM/FS ID-teams review CEA	1/2/15 to 1/16/15	
	BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	1/2/15 to 1/16/15	2 weeks
	EMPSi revises CEAs	1/17/15-1/27/15	

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	Consistency Review Strike Team Reviews all 14 Draft FEISs.	1/19/15 to 1/26/15	1 week
	BLM/FS ID-teams respond to potential issues from Consistency Review Strike Team.  BLM/Contractors incorporate CEAs and make modifications for WO Review versions of the FEIS.	1/26/15 to 1/30/15	1 week
	Submit briefing packet to WO/WO Review Kick-off Briefing	2/2/15	
8	WO Review (CONCURRENT COOPERATING AGENCY REVIEW)	2/2/15 to 2/13/15	2 weeks
	BLM Consolidate/filter all WO BLM/FS & SOL/OGC comments	2/16/15 to 2/18/15	2 days
8a	Sub-regions respond to WO review comments	2/18/15 to 2/25/15	1 week
8b	WO resolves any pending concerns that arise out of the WO Review	2/25/15 to 2/27/15	2 days
	BLM/Contractors make modifications in Public Review versions of the FEIS.	2/27/15 – 3/5/17	1 week
9	<del>National Policy Team Briefing</del>	3/3/15	
10	<del>BLM Director's Briefing</del>		
	Interagency Leadership Briefing		
11	Secretaries of DOI and USDA Briefing	3/6/15	
	BLM/Contractors compile, format, tech edit, and QA PLUPA/FEIS	3/6/15 to 3/13/15	1 week
	Camera-ready copy to GPO/PDF for website	3/13/15	
	Printing and distribution by GPO	3/13/15 to 3/27/15	2 weeks
12	Publish Proposed Plan EISs (falls on a Friday per EPA requirements)	3/27/15	
13	Protest Period Ends (30 day mandatory protest period)	4/27/15	
13a	Protest Resolution Process Ends	5/27/15	30 days
14	Governor's Consistency Review Ends (60 day mandatory governor consistency review)	5/27/15	
15	<del>National Policy Team Briefing</del>	5/28/15	
	<del>BLM Director's Briefing</del>		
	Interagency Leadership Briefing		
16	Secretaries of DOI and USDA Briefing	5/29/15	
17	RODs are signed	5/29/15	

## Attachment 5: GRSG Strike Team Roles and Responsibilities

### Greater Sage Grouse Strike Team Roles and Responsibilities

The Greater Sage Grouse (GRSG) Strike Team (ST) is being established to ensure the following outcomes are achieved with the National GRSG Conservation Strategy:

- Ensure National Policy Team guidance and management direction is consistently incorporated into the GRSG Proposed Plans/Amendments
- Ensure that the Proposed Plans/Amendments include the appropriate conservation framework and objectives
- Ensure the plans collectively result in a cohesive federal land management conservation strategy for the GRSG
- Ensure consistency with the Record of Decisions

1). GRSG Core Team – The Core Team is responsible for overall project coordination and to ensure the conservation strategy outcomes are achieved. The Core team is also responsible for coordination with the other GRSG teams, which include the Regional Project Managers, Ad Hoc, WO Planning Review and Protest teams.

GRSG Core Team	
Stephanie Carmen vice Kathy Stangl	BLM National SG Coordinator
Joe Stout	BLM Division Chief, Decision Support, Planning and NEPA
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Steve Small	BLM Division Chief, Wildlife Conservation
Vicki Herren	BLM NOC, Wildlife Biologist
Frank Quamen	BLM NOC, Wildlife Biologist, Geospatial Analyst
Kurt Wiedenmann	BLM Liaison to ASLM
Aaron Moody	SOL
Sarah Shattuck	SOL

2). GRSG Regional Project Managers

GRSG Regional Project Managers	
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
Glen Stein	Forest Service Project Manager

3). GRSG Ad Hoc Team – The Ad Hoc team will add capacity and expertise in the areas of communications, web support, planning and applied science. The team will also provide recommendations for solutions to unique situations. Specific deliverables include an internal/external communication plan.

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GRSG Ad Hoc Team	
Mitch Snow	BLM Communications/PAO
TBD	(Writer/Editor/Web Master) Ed is working with Celia, NOC and NIFC
David Batts	EMPSI
Gordon Toevs	BLM, WO AIM Coordinator
Tom Rinkes	BLM, Retired Wildlife Biologist
Mike Pellant	BLM, Retired

4). GRSG Consistency Review Team – The consistency team will be responsible for reviewing all the Administrative Draft Proposed Plans (ADPP) prior to the larger WO review. Specifically, the team will focus on consistent incorporation of National Policy Team, Federal Family meeting and other Washington Office guidance. This team will also be responsible for drafting the Record of Decisions.

GRSG Consistency Review Team	
Review Prior to formal WO Review	
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
EMPSi	TBD
Glenn Stein	Forest Service Project Manager
Development of the Records of Decisions (RODs)	
Matthew Magaletti	BLM WO Planning and Environmental Analyst
Lauren Mermejo	BLM Great Basin Project Manager
Johanna Munson	BLM Rocky Mountain Project Manager
EMPSi	TBD
Glenn Stein	Forest Service Project Manager
Aaron Moody	SOL
Sarah Shattuck	SOL
ASLM Representative	TBD

5). GRSG WO Planning Review Team – The WO Planning Review Team members and procedures are included in Attachment 2.

6). GRSG WO Protest Team – The BLM WO Division of Decision Support, Planning and NEPA is responsible for resolving all land use planning protests. The GRSG Plans and Amendments are subject to a 30-day public protest period. The BLM must resolve all public protests before each GRSG Plan can be approved. The Forest Service will be adopting the BLM's protest resolution process to satisfy their regulatory requirements. The team will develop a protest resolution strategy.

GRSG WO Protest Team	
Michael Hildner	BLM Colorado State Office, Planning and Environmental Analyst (Proposed)
Team members	TBD
Forest Service Team members	TBD

WO GREATER SAGE-GROUSE ADMINISTRATIVE PROPOSED RMP/RMP  
 AMENDMENT AND FINAL EIS REVIEW PROTOCOL

As mentioned in the Land Managers’ Decision Document GRSG-4, the Washington Office Greater Sage-grouse Strike Team has been tasked with “reviewing the Greater Sage-Grouse RMP Amendment EISs and the relevant Greater Sage-Grouse sections of the ongoing RMP amendments and/or revisions to ensure that applicable conservation measures have been considered, as per the requirements the NTT Report and IM No. 2012-044.” The WO review will take approximately two weeks to complete. Prior to the review, you will receive an email and invitation to the WO GRSG Strike Team Kick-off Review Briefing, where the State/Field Office will brief the WO reviewers on the A-PRMP/FEIS. This Kick-off Briefing will initiate the two week WO GRSG Strike Team review period. All comments should be placed on the WO Comment Review Form, which will be linked to the Kick-off Briefing email invitation. Please email your completed comment forms to Matthew Magaletti ([mmagalet@blm.gov](mailto:mmagalet@blm.gov)) at the end of the review period.

- I. What the W O GRSG Strike Team will be looking for during their review of the A-PRMP revision or amendment

Basic RMP Review Procedures	Responsibility
Ensure that the RMP amendment/revision alternatives/proposed management actions are consistent with your program area’s laws, regulations, and policy, and are of sufficient quality to support implementation of BLM programs. WO review should focus on high-level issues concerning national policy and standards. Feel free to use Appendix C of the Land Use Planning Handbook to verify what constitutes an appropriate LUP decision for your program area.	All programs
Review “Alternatives Considered but Not Fully Analyzed” to ensure that rationale for eliminating alternatives is clear and consistent with BLM policy.	All programs
Ensure that chapter 3 and 4 uses accepted criteria, indicators, benchmarks, and methods for analysis, and describes the affected environment clearly and consistently with national policy. Please note that the planning efforts associated with GRSG are focusing on portraying the amelioration of threats to the GRSG and have used baseline information from the USGS’s Baseline Environmental Report (BER), which was conducted specifically for this effort.	All programs
Review Procedures Unique to the GR SG Review	
Are all of the proposed actions presented in the A-PRMP/FEIS sufficiently protective of GRSG such as to contribute to reducing the need to list the species under the Endangered Species Act (per IM-2012-044)?	WO-230
Are all of the BMPs addressed in the NTT Report carried forward as Required Design Features (per GRSG-7)? Focus your review on the RDFs that are specific to your program area.	All programs
Were public comments submitted on the DEIS adequately responded to in the A-PRMP/FEIS (focus specifically on the FWS/State agency comments)? Focus your review on the responses relative to your program area.	All programs
Were all unresolved issues identified during the first regional reviews addressed (per GRSG-14)?	WO-210
Does the A-PRMP/FEIS contain the following consistent National GRSG Planning Strategy components:	WO-210 & WO-230

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October 17, 2014

<ul style="list-style-type: none"> <li>• Ch. 1 section that provides the context needed to indicate how this planning effort fits into overall National GRSG Planning Strategy.</li> <li>• Population Conservation Summaries in ES or Ch. 1 (including rationale for why NPT allocation decisions were not applied to Priority or General Habitat).</li> <li>• Monitoring Framework Appendix and ch.2 introductory language.</li> <li>• Mitigation Framework and ch. 2 introductory language.</li> <li>• Ensure that the National Policy Team’s consistent allocation recommendations are presented in ch. 2. If not, ensure that there is sufficient rationale provided in the “population conservation summaries” in the Executive Summary.</li> <li>• Adaptive management ch. 2 introductory language and a management action that articulates what the hard trigger is and the related response.</li> <li>• For Great Basin amendments only– ch. 2 introductory language for wild land fire language.</li> <li>• Ch. 4 conservation effects table that ties the analysis back to the COT Report objectives.</li> <li>• Ch. 4 WAFWA MZ level CEA for GRSG (the CEA may not be completed in time for the WO review).</li> </ul>	
<p>Is the A-PRMP/FEIS adaptive management approach consistent with the national adaptive management concept paper and sideboards?</p>	<p style="text-align: center;">WO-210 &amp; WO-230</p>
<p>If the document includes Forest Service units – is this clearly articulated throughout the document?</p>	<p style="text-align: center;">WO-210</p>

II. Next Steps after the WO has submitted comments back to the BLM State Office:

WO-210 will consolidate all of the WO GRSG Strike Team comments and will submit them to the State/Field Office. The State/Field Office will then be responsible for sending back to the WO the WO Comment Review Form with their responses on how they addressed your concerns. Once the responses are sent to WO-210, you will receive an email asking you to verify whether or not your concerns have been addressed appropriately. If your concerns have been addressed and the associated revisions to the ADRMP/APRMP have been made, please email Matthew Magaletti ([mmagalet@blm.gov](mailto:mmagalet@blm.gov)) within 48 hours from receiving the email. If no email is sent to the WO, WO-210 will assume that your concerns have been adequately addressed. WO-210 will notify the State/Field Office that all of the concerns have been resolved and the State/Field office will begin scheduling a briefing with the GRSG National Policy Team (NPT). At the NPT briefing, the NPT members will make the recommendation on whether or not the PRMP can be presented to the BLM Director.

III. WO GRSG Strike Team

- Kimberly Hackett – Livestock Grazing
- Dick Mayberry – Livestock Grazing
- Ken Visser – Livestock Grazing
- Brian Novasak – Wildlife
- Vicki Herrin – Wildlife
- Travis Kern – Fluid Minerals
- Rick Deery (Backup: Mitchel Leverette) – Solid Minerals
- Jennifer Whyte– Lands and Realty



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- Brenda Wilhight – Lands and Realty
- Rob Perrin – Travel
- Dorothy Morgan – Recreation
- David Ballenger – Recreation
- Zack Reichold – WH&B
- Aaron Moody – SOL (Great Basin Region)
- Sarah Shattuck – SOL (Rocky Mountain Region)
- Jolie Pollet - Fire
- Kristy Swartz – Fire
- Bob Wick – NLCS (Wilderness)
- Doug Herrema – NLCS (National Monuments and NCAs)
- Matthew Preston – NLCS (Mitigation)
- Britta Nelson – NLCS (WSRs and Trails)
- Matthew Magaletti – Planning
- Karen Prentice – Healthy Lands
- Rob Winthrop – Socioeconomics

IV. Resources

Link to IM-2012-044 and the NTT Report:

[http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2012/IM\\_2012-044.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-044.html)

Link to GRSG Documents on the BLM GRSG Administrative Records Site:

[https://connect.doi.gov/uniqueid9a79b9d61a63982645fad83233d9ce7a/uniqueid0/InternalSite/Login.aspx?resource\\_id=A59F1E5B16ED4320A717A2AD0F62F245&login\\_type=2&site\\_name=sharepoint&secure=1&orig\\_url=https%3a%2f%2fconnect.doi.gov%2fblm%2fPortal%2fGSGrouse%2fSitePages%2fHome.aspx](https://connect.doi.gov/uniqueid9a79b9d61a63982645fad83233d9ce7a/uniqueid0/InternalSite/Login.aspx?resource_id=A59F1E5B16ED4320A717A2AD0F62F245&login_type=2&site_name=sharepoint&secure=1&orig_url=https%3a%2f%2fconnect.doi.gov%2fblm%2fPortal%2fGSGrouse%2fSitePages%2fHome.aspx)

FWS Conservation Objectives Team (COT) Report

<http://www.fws.gov/mountain-prairie/species/birds/sagegrouse/COT/COT-Report-with-Dear-Interested-Reader-Letter.pdf>

USGS Baseline Environmental Report (BER)

<http://pubs.usgs.gov/of/2013/1098/OF13-1098.pdf>

V. Final Work Review Schedule

Greater Sage -Grouse Work -PRMP/PRMP Amendment Review Schedule		
Sub-regional Planning Effort	Projected Work Two Week Review Period	Projected Publication Dates
GRSG Land Use Plan Amendments		
Nevada and NE California Sub-Regional Greater Sage-Grouse RMP	Spring 2015	PRMP/FEIS: Spring 2015 ROD: Summer 2015

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October 17, 2014

Greater Sage -Grouse WOA-PRMP/PRMP Amendment Review Schedule		
Sub-regional Planning Effort	Projected WOTwo Week Review Period	Projected Publication Dates
Amendment/EIS		
Idaho and SW Montana Sub-Regional Greater Sage-Grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Utah Sub-Regional Greater Sage-grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Oregon Sub-Regional Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Northwest Colorado Greater Sage-Grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Lewistown Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
North Dakota Greater Sage-grouse RMP Amendment/ EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Nine-Plan Greater Sage-grouse RMP Amendment/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
RMP Revisions including GRS G Management		
Billings/Pompeys Pillar National Monument RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
HiLine RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Miles City RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
South Dakota RMP/EIS	Spring 2015	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Lander RMP/EIS	Completed, pending SOL review	<u>PRMP/FEIS</u> : February 22, 2013 <u>ROD</u> : June 20, 2014
Bighorn Basin RMP/EIS Supplement	Completed, pending SOL review	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015
Buffalo RMP/EIS	Completed, pending SOL review	<u>PRMP/FEIS</u> : Spring 2015 <u>ROD</u> : Summer 2015

GREATER SAGE GROUSE MEETING  
NATIONAL CONSERVATION TRAINING CENTER  
SHEPHERDSTOWN, WV  
OCTOBER 20, 2014  
BLM Leadership Discussion  
9:00am – 12:00pm

Meeting objective : To discuss the remaining GRSG key issues and reach agreement on a corporate approach for our discussions with the Department in the afternoon.

- 9:00 am Welcome and meeting objectives – Neil and Steve
- 9:15 – 10:30 am Review of Key Issues - Ed
- Disturbance
  - Mitigation
  - Adaptive Management
  - Vegetative Objectives
  - Livestock Grazing
- 10:30 am Break
- 10:45 am – 11:30 am Review of Key Issues – Ed
- Allocations (ROWs, Corridors, Mineral Materials)
  - NSO language for fluids
  - Smart from the start (conservation objective for leasing and development)
  - Coal Suitability
- 11:30 am – 12:00 pm Review of Key Issues – Ed
- Mapping (PAC boundaries)
  - Political Boundary Issues
  - Buffers
- 12:00 pm – 1:00 pm Lunch with Department



Beck, Jonathan <jmbeck@blm.gov>

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## EPA Comments on the Final EIS and Proposed Plan for Idaho and Southwestern Montana Sub Regional Sage-Grouse

1 message

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Peterson, Erik <Peterson.Erik@epa.gov>

Mon, Jun 29, 2015 at 6:38 PM

To: "jmbeck@blm.gov" <jmbeck@blm.gov>

Cc: "Reichgott, Christine" <Reichgott.Christine@epa.gov>, "Wright, Wendy" <Wright.Wendy@epa.gov>

Mr. Beck,

EPA's comments on the Final EIS and Proposed Plan for Idaho and Southwestern Montana Sub-Regional Sage-Grouse are attached.

Thank you again for your time two weeks ago to discuss the Proposed Plan.

Erik Peterson

Office of Ecosystems, Tribal and Public Affairs

EPA Region 10 - Seattle

peterson.erik@epa.gov

206-553-6382



**13-0039-BLM FEIS Idaho and SW Montana Greater Sage Grouse Land Amendment.pdf**  
358K



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

June 29, 2015

Jonathan Beck, Project Lead, Greater Sage-Grouse LUP Amendments,  
Idaho and Southwestern Montana Sub-Region  
Bureau of Land Management  
1387 South Vinnell Way  
Boise, Idaho 83709

Dear Mr. Beck:

The EPA has reviewed the BLM and Forest Service's Idaho and Southwestern Montana Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement (FEIS) (EPA Project Number 13-0039-BLM FEIS). Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

We applaud your efforts to amend land use plans with regulatory mechanisms that will avoid continued degradation of greater sage-grouse habitat because, according to information cited in the FEIS, if current trends in wildfire, populations and habitat activities continue, populations of sage-grouse in Management Zone IV (most of Idaho and parts of Montana, Utah, Nevada and Oregon) are estimated to decline by 55 percent between 2007 and 2037, and by 66 percent in MZ II (Wyoming and parts of Idaho, Utah and Colorado).<sup>1</sup> Land use plan amendments are a necessary part of efforts to reverse these negative population trends.

**Responsiveness to our Draft EIS comments**

Our primary concern with the Draft Land Use Plan Amendments/EIS (DEIS) was the relatively smaller amount of greater sage-grouse (GRSG) habitat provided by the most protective management designation in Alternative E - one of the DEIS's co-preferred alternatives. By increasing the amount of GRSG habitat receiving the most protective management designation by 295,800 acres, the Proposed Plan is partially responsive to our primary environmental concern.

We also recommended a more precautionary approach to adaptive management. While the FEIS maintains a reaction based approach - increasing protection when monitoring shows habitat and population declines - we appreciate the FEIS's additional adaptive management information. Improvements to the adaptive management and monitoring appendices help to increase the likelihood that the proposed adaptive management strategy will be effective.

The FEIS includes responsive information on our other DEIS comments, relating to: fire management, grazing, infrastructure, consistency with conservation criteria, and Areas of Critical Environmental Concern.

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<sup>1</sup> FEIS, p. 1-19

In the interest of further improving the Proposed Plan between now and the Record of Decision, we offer the following recommendations.

**Increase or maintain the amount of Priority Habitat Management Area in the Final Plan**

Our primary environmental concern about the relative amount of GRSG habitat receiving the most protective designation largely remains. This concern remains because the FEIS's Proposed Plan provides the most protective designation for 1,367,200 fewer acres of Priority Areas for Conservation compared to Alternative D.<sup>2</sup> Priority Areas for Conservation are described in the COT report as, "...key habitats that are essential for sage-grouse conservation".<sup>3</sup>

To address our primary environmental concern, we reiterate our recommendation for the final Plan to increase or maintain the current amount of Priority Habitat Management Area (PHMA). Strong protections for key habitat increases the likelihood that the highest level objective, a neutral or positive population trend, can be achieved.

**Establish a goal or monitoring measure for Rangeland Fire Protection Associations**

Habitat loss and fragmentation due to increased occurrence of wildfire is one of the primary threats to GRSG within the Idaho and Southwestern Montana Sub-region.<sup>4</sup> Overall, we believe that the Proposed Plan's management for Wildfire Preparedness/Prevention, Wildfire Suppression, and Fuels Management will help to alleviate this primary threat. To improve fire related management, particularly response times, we suggest you consider establishing a goal and monitoring measure for Rangeland Fire Protection Associations.

Rangeland Fire Protection Associations take advantage of quick initial attack that ranchers can provide; satisfy ranchers' interest in being active participants and managers of safety concerns; and enhance efforts to protect sage grouse habitat. A stated goal - based on the general principal that what we measure, matters - could include a goal of 100 percent of GRSG PHMA habitat with established Rangeland Fire Protection Associations.

**Clarify the anthropogenic disturbance calculation for Idaho**

We appreciate the anthropogenic disturbance cap because we believe it will help to avoid and minimize another primary threat to GRSG in Idaho and Southwestern Montana - human development. The human development threat includes impacts from the construction and operation of transmission lines, pipelines, roads and other development as defined in the EIS.

To reduce potential confusion on how the disturbance calculation is made in Idaho, we recommend that the Record of Decision (ROD) or final adaptive management document include clarifying information on how fire, invasives or other non-anthropogenic disturbances, are accounted for. We believe clarifying information is necessary because FEIS Appendix G appears to present fire effects both as being excluded and included in the calculation.<sup>5</sup> Excluding the fire effects would increase risk to GRSG by

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<sup>2</sup> See FEIS, Table 4-16

<sup>3</sup> U.S. Fish and Wildlife Service, Dear Interested Reader introduction to the Greater Sage-grouse Conservation Objectives: Final Report, available online at: <http://www.fws.gov/greatersagegrouse/documents/COT-Report-with-Dear-Interested-Reader-Letter.pdf>

<sup>4</sup> FEIS, p. 1-13

<sup>5</sup> "Areas that are not sage-grouse seasonal habitats, or are not currently supporting sagebrush cover (e.g., due to wildfire), are not excluded from the acres of PHMA in the denominator of the formula." (FEIS, p. G-5)

potentially over-estimating actual GRSG habitat. Including the fire effect would be more protective for GRSG because the disturbance cap is measured as a proportion of actual habitat.<sup>6</sup> Addressing this recommendation could be as simple as more clearly differentiating the Idaho equation from the Southwestern Montana equation.

**Address implementation certainty for adaptive management**

To increase the likelihood that management responses will be implemented and effective, we recommend that the ROD or final adaptive management document include additional information on potential implementation level actions to consider in the event that hard trigger criteria are met. FEIS Appendix G includes a list of actions to consider in the event that soft trigger criteria are met.<sup>7</sup> Please address whether that same list also applies to hard triggers.

A major adaptive management response is to increase protections by managing Important Habitat Management Areas as Priority Habitat Management Areas. Other management responses to consider that are listed in FEIS Appendix G, and which we believe may be both necessary and difficult to implement, depend on increasing or reallocating resources.

For actions which depend on increasing resources, we recommend that the ROD, or final adaptive management document, include additional information on the certainty of adequate resources for full implementation.

For actions that depend on reallocating resources, we recommend that the ROD or final adaptive management document include additional information on the certainty that all necessary parties will approve, and that the BLM will be able to implement, the re-direction of resources based on GRSG monitoring information.

If you have questions regarding our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) , or Erik Peterson at (206) 553-6382 or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

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<sup>6</sup> "The Idaho calculation does consider the effect fire has on the habitat and includes loss of habitat from fire as part of the calculation by weighting the denominator based on the actual habitat available to the GRSG." (FEIS, p. G-15)

<sup>7</sup> FEIS, p. G-34-35



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



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2.1  
12/03/2014

In Reply Refer To:  
1110 (931) I

October 14, 2014

EMS TRANSMISSION 10/14/2014  
Information Bulletin No. ID-2015-001

To: Idaho Bureau of Land Management (BLM) Leadership Team

From: Idaho State Director

Subject: Idaho Southwestern Montana Greater Sage-Grouse (GRSG) Administrative Draft  
Proposed Plan (ADPP)

**DD: 10/24/2014**

Since December 2011, the BLM has been leading an effort to incorporate conservation measures as regulatory mechanisms into existing BLM and United States Forest Service (USFS) land use plans in response to the US Fish and Wildlife Service (USFWS) March 2010 finding on GRSG. The Idaho and Southwestern Montana sub region amendments are an integral component of the BLM National GRSG Planning Strategy and encompass the relevant BLM district and field offices and the National Forests which manage GRSG habitat within the sub region. Each BLM district has provided technical and specialist support to the Sub Regional Interdisciplinary Team (Team). This Team is composed of staff from the BLM, USFS, USFWS, Natural Resource Conservation Service, Idaho Department of Fish and Game, Montana Fish, Wildlife and Parks, and the Idaho Office of Species Conservation. Together this Team has worked collaboratively to develop a Draft Environmental Impact Statement with five (5) alternatives analyzed in detail, which identified two (2) alternatives as co-preferred – one developed by the Team and one developed by the State of Idaho for lands within the State of Idaho.

This Team has continued on to develop the attached Administrative Draft Proposed Plan (ADPP). The ADPP is the result of significant collaboration between the Federal, state and local partners, augmentation and refinement to respond to the USFWS Conservation Objectives Team Report (March 2013), coordination and direction with the BLM, Forest Service and USFWS National Policy Team, regional coordination involving the Department of the Interior, Western Association of Fish and Wildlife Agencies and the Western Association of Governors. The ADPP represents the culmination of this coordination. It contains direction that is consistent with the USFWS Conservation Objectives Team Report and the National Policy Team Guidance. Many of the management actions reflect direction that is national or regional in scope with limited or no flexibility for local or sub regional adjustment; other management actions are more specific to the Idaho and Southwestern Montana effort with a greater flexibility for refinement.



Representatives of your staff have been involved throughout the development of this ADPP and their input has served to identify issues and concerns, as well as provide suggestions and solutions to resolve many of those concerns.

The ADPP reflects a shift of management in GRSG habitats and will lead to changes in the way the BLM does business in those areas. As the amendment effort moves closer to conclusion the Team is focusing more energy on implementation consideration and direction. A preliminary Implementation Guide is being developed, a draft of which will be included in the Final Environmental Impact Statement and is intended to be finalized after release of the final amendment decision(s). To help develop this guide a series of BLM and USFS staff workshops are contemplated and will likely occur early in calendar year 2015 for each BLM district office area. These workshops will step through the potential planning decisions and discuss approaches and processes for implementation that will be used to develop the final guide. We encourage your review and understanding of the ADPP, in preparation for those meetings. If you, or your staff, have questions or substantive comments on the ADPP, please contact Brent Ralston, Greater Sage-Grouse Planning Lead, prior to October 24, 2014.

The participation and involvement of your staff has been a significant factor in success of this effort thus far. Revision of 29 land use plans across 11 million Federal acres within the sub region has been a massive undertaking, and the contributions of your staff have come at the expense of other work on the district. The amendment effort is nearing completion and the even more important job of implementation is looming. Your continued support and attention to helping develop the Implementation Guide will be instrumental to ensure the success of on-the-ground actions to conserve GRSG into the future.

Signed by:  
Timothy M. Murphy

Authenticated by:  
Terrian Wells  
Program Analyst - Litigation

### 3 Attachments

- 1 - [Idaho and Southwestern Montana Administrative Draft Proposed Plan](#) (52 pp)
- 2 - [Administrative Draft Propose Plan Supporting Appendices](#) (194 pp)

cc: Montana State Director  
Western Montana District Manager  
Dillon Field Office Manager

## **Idaho and Southwestern Montana Recommendation for Proposed Plan Amendment**

### **1. Summary Description of the Proposed Plan (Plan)**

The Proposed Plan represents a management strategy to address Greater Sage-grouse, their habitat and associated threats within the Idaho and Southwestern Montana Subregion. The Plan has been developed through a coordinated partnership of BLM, Forest Service, the States of Idaho and Montana and the US FWS.

The Plan incorporates appropriate conservation measures to conserve, enhance, and restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat. The Plan is also consistent with the objectives described in the USFWS Conservation Objectives Team Report (USFWS 2013) to: ‘Conserve sage-grouse so that it is no longer in danger of extinction or likely to become in danger of extinction in the foreseeable future...’ through ‘Maintaining viable, connected, and well-distributed populations and habitats across [the range of GRSG], through threat amelioration, conservation of key habitats, and restoration activities’.

To achieve these objectives the Plan includes a combination of: Goals and Objectives including vegetation/habitat management objectives to be applied during project development and implementation (Table 3); land allocation decisions (Table 1); delineation of five Conservation Areas (Map 1) to support evaluation of the adaptive management strategy and 3% anthropogenic disturbance cap; delineation of Priority, Important and General Habitat Management Areas (Map 2) with associated program management direction; a mitigation framework and strategy; development of Wildfire and Invasive Species Assessments; and associated monitoring to support these decisions.

**Table 1. Idaho and Southwestern Montana GRSG EIS – Land Allocation Decisions Summary<sup>1</sup>**

<b>Solar/Wind/Nuclear/Hydropower – Map 3</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
BLM: Exclusion (LR-2) FS: Exclusion	BLM: Avoidance (LR-2) FS: Exclusion	BLM: Open (LR-2) FS: Avoidance
<b>Commercial Service Airports – Map 4</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Exclusion (LR-3)	Avoidance (LR-1)	Open (LR-1)
<b>Landfills – Map 4</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Exclusion (LR-4)	Avoidance (LR-1)	Open (LR-1)
<b>Utility Corridors – Map 5</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Existing designated corridors which are land use plan designations (and include Section 368 Corridors), will remain “open” (subject to the ongoing settlement agreement) and can provide an opportunity to be modified with mitigation. Any new disturbance within these corridors would count towards the disturbance cap. All new, modified, or deleted corridors will require a land use plan amendment. (LR-7)	Same as Priority (LR-7)	Same as Priority (LR-7)
<b>Rights-of-Way and Land Use Authorizations/Permits – Map 6</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Avoidance (LR-1)	Avoidance (LR-1)	BLM: Open (LR-1)

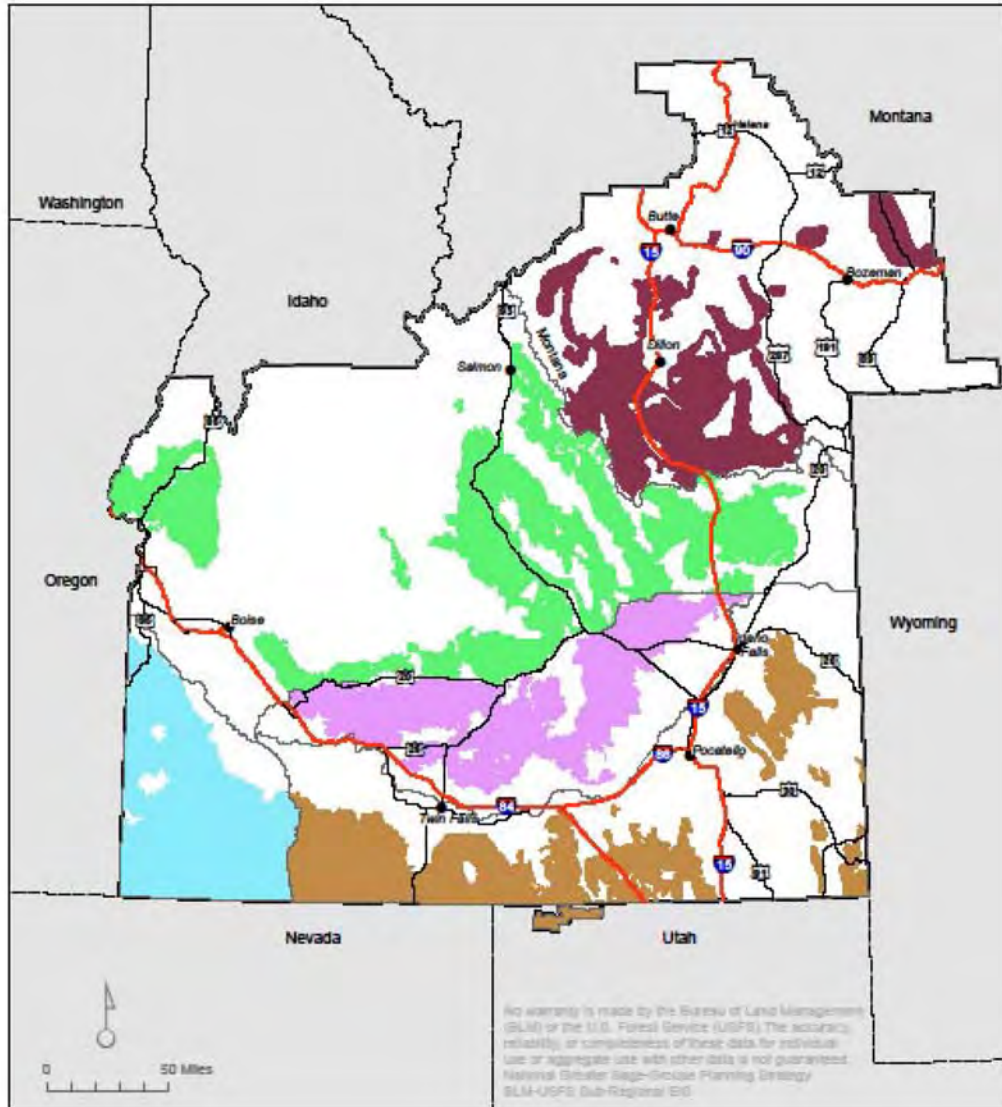
<sup>1</sup> The Idaho and Southwestern Montana Subregion includes portions of Idaho, Montana and Utah. Where differences exist between direction for Idaho and Montana or between BLM and Forest Service, those are noted in the table and within the management action section. The lands within Utah are part of the Sawtooth National Forest and are managed as such; therefore direction for these lands in Utah is the same as that described for the Sawtooth National Forest in Idaho.

		FS: Avoidance
<b>Land Tenure Adjustments – Map 7</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Retention with exceptions for exchange; available for exchange with no net loss of GRSG Key habitat within Priority and Important. Not available for disposal. (LR-13)	Same as Priority (LR-13)	Available for exchange subject to existing land use plan conformance (No Action)
<b>Fluid Mineral Resource Allocation (Includes Geothermal) – Maps 8 &amp; 9</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Idaho: Open subject to No Surface Occupancy with a limited exception.  Montana: Open subject to No Surface Occupancy with a limited exception. (FLM-1)	Idaho: Open subject to No Surface Occupancy with a limited exception. Montana: Not Applicable (FLM-1)	Idaho and Montana: Open subject to Controlled Surface Use and Timing Limitations (FLM-1)
<b>Locatable Minerals – Map 10</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Areas not previously withdrawn are Open.	Areas not previously withdrawn are Open.	Areas not previously withdrawn are Open.
<b>Non-Energy Leasables – Map 11</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Known Phosphate Leasing Areas (KPLAs) are Open subject to standard leasing stipulations. Closed to leasing outside KPLAs (NEL-1)	KPLAs are Open subject to standard leasing stipulations. Areas outside KPLAs are Open subject to standard and greater sage-grouse stipulations (required design features, seasonal timing restrictions). (NEL-1)	Open to leasing with standard and greater sage-grouse stipulations (required design features and seasonal timing restrictions) (NEL-1)
<b>Mineral Materials (Salable Minerals) – Map 12</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
Closed to new site authorizations.	Open to new site authorizations subject to	Open to new site authorizations subject to

Existing sites Open to new sales subject to RDFs, buffers and seasonal timing restrictions. (SAL-1)	criteria. Existing sites Open to new sales subject to seasonal timing restrictions. (SAL-1)	RDFs, buffers and seasonal timing restrictions. Existing sites Open to new sales subject to seasonal timing restrictions. (SAL-1)
<b>Travel Management – Map 13</b>		
<b>Priority</b>	<b>Important</b>	<b>General</b>
BLM: Limited to Existing (TM-1) FS: Limited to Designated	BLM: Limited to Existing (TM-1) FS: Limited to Designated	BLM: Limited to Existing (TM-1) FS: Limited to Designated

DRAFT

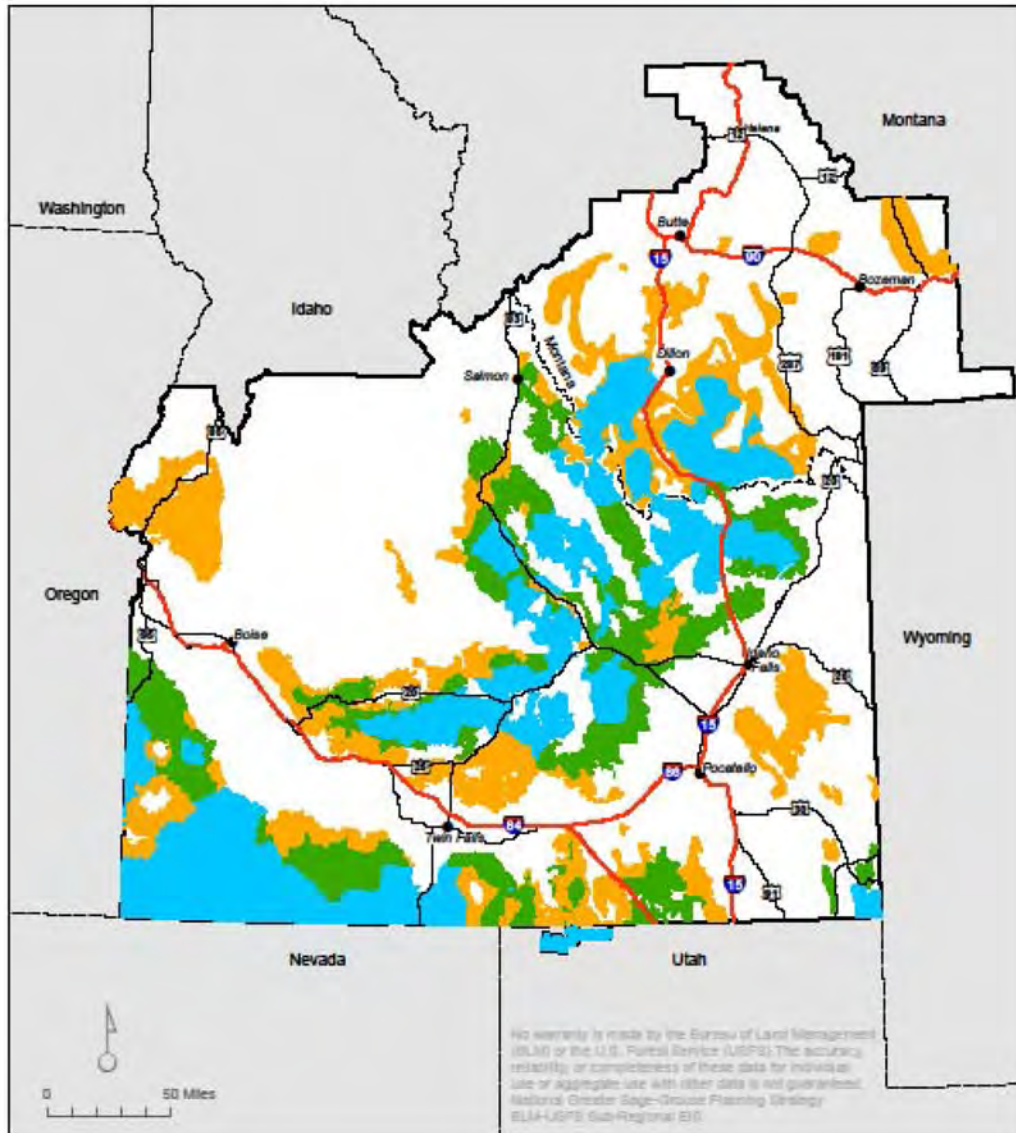
Map 1. Conservation Areas within Idaho and Southwestern Montana Subregion



- Conservation Area with Management Zone**
- Idaho Desert Conservation Area
  - Idaho Mountain Valleys Conservation Area
  - Idaho Southern Conservation Area
  - Idaho West Owyhee Conservation Area
  - SW Montana Conservation Area

- Conservation Area Boundary
- Analysis Boundary

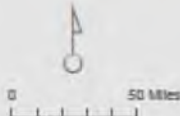
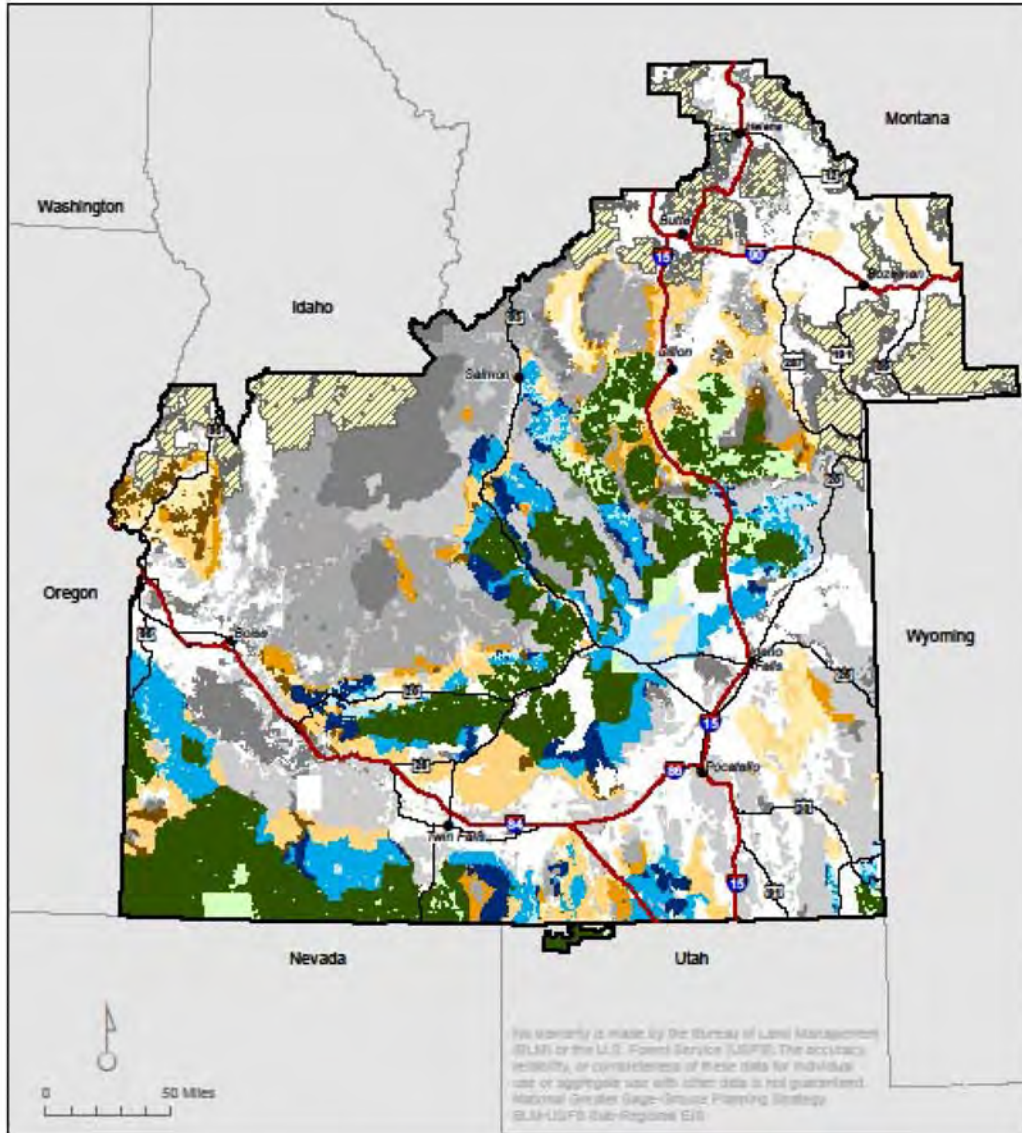
Map 2. Management Areas within Idaho and Southwestern Montana Subregion



- Management Zone**
- Core
  - Important
  - General
  - Analysis Boundary

Map 3. Wind and Solar Development Allocations

Alternative G: Wind and Solar Constraints



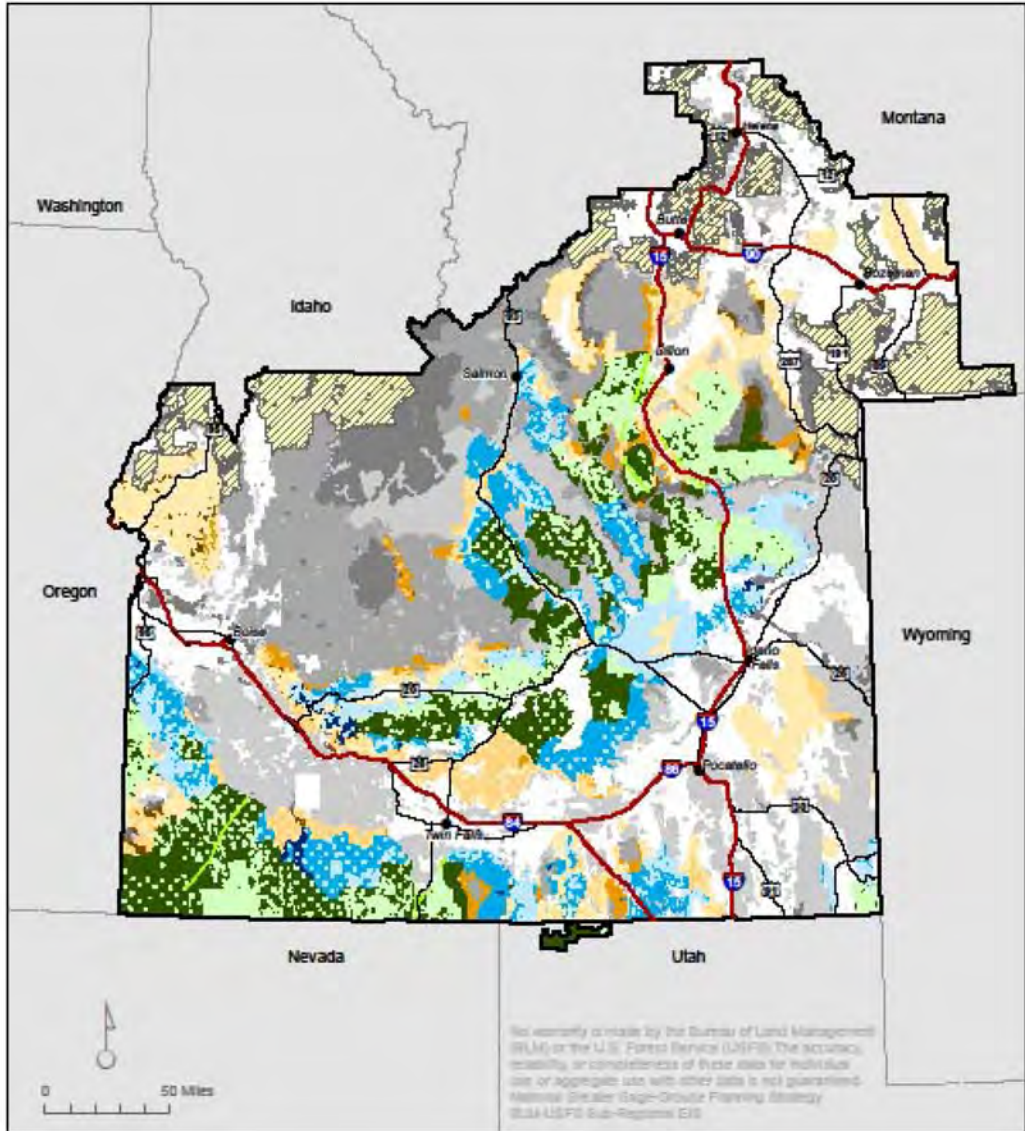
This map was made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS). The accuracy, reliability, or consistency of these data for individual use or aggregate use with other data is not guaranteed. National Geospatial Data-Information Planning Strategy BLM-USFS Sub-Regional EIS

Analysis Boundary	<b>Constraints/Management Zone</b>	<b>Core</b>	<b>Important</b>	<b>General</b>	<b>Not in habitat</b>
USFS Not Analyzed	Exclusion				
	Avoidance				
	Open				
	Not BLM/USFS Managed Lands				



Map 4. Commercial Service Airport and Landfill Development Allocations

Alternative G: Commercial Service Airports and Landfills Constraints



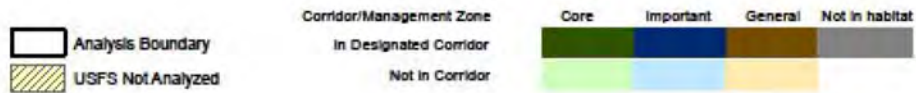
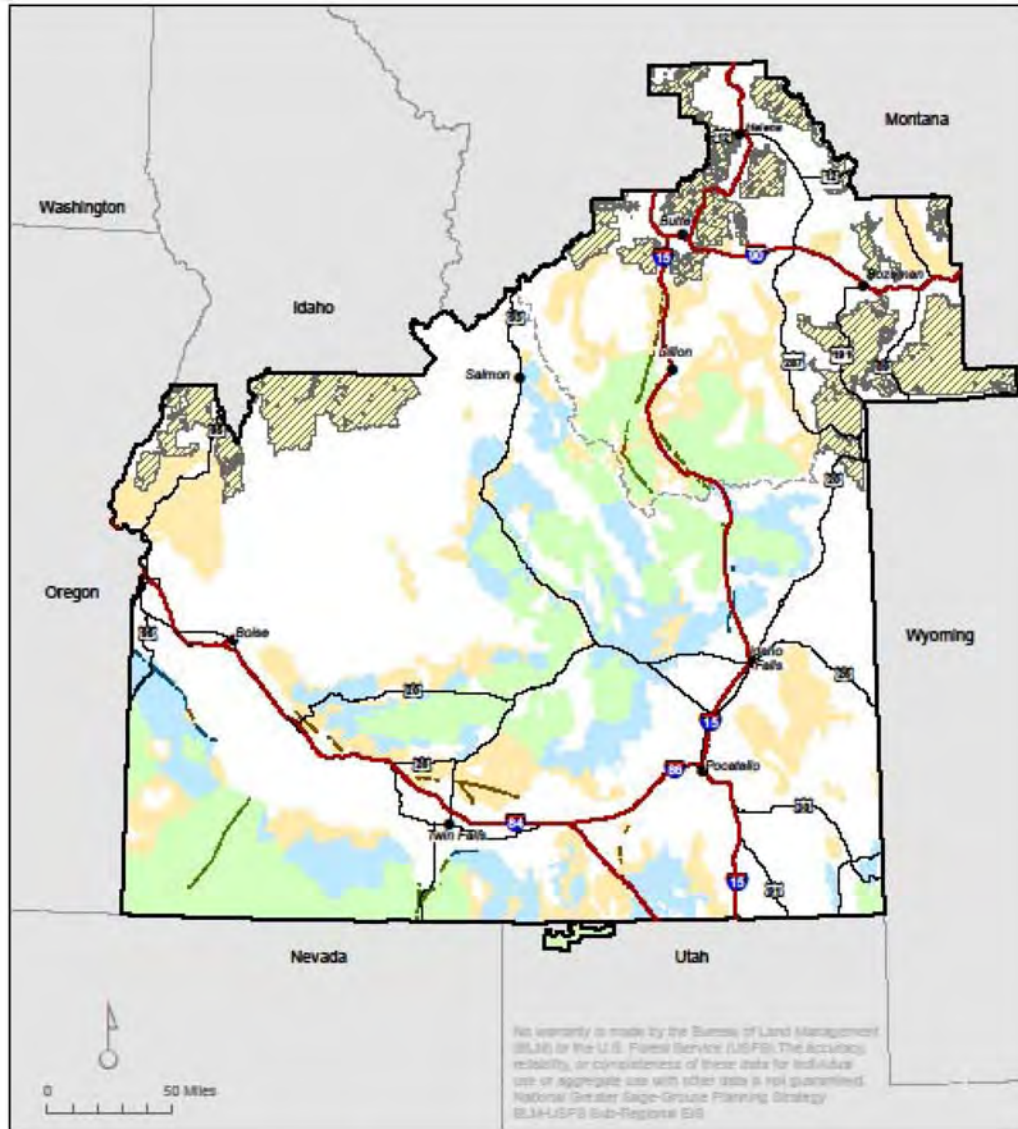
Analysis Boundary  
 USFS Not Analyzed

**Constraints/Management Zone**  
 Exclusion  
 Avoidance  
 Open  
 Not BLM/USFS Managed Lands

	Core	Important	General	Not in habitat
Exclusion	Dark Green	Dark Blue	Dark Brown	Grey
Avoidance	Light Green	Light Blue	Light Brown	Light Grey
Open	Very Light Green	Very Light Blue	Very Light Brown	Very Light Grey
Not BLM/USFS Managed Lands	White	White	White	White

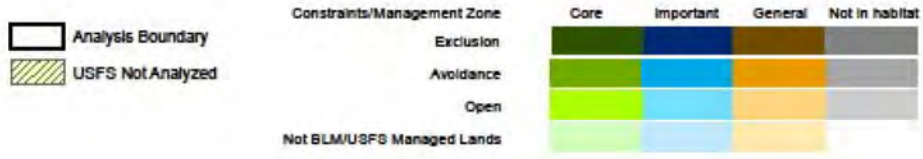
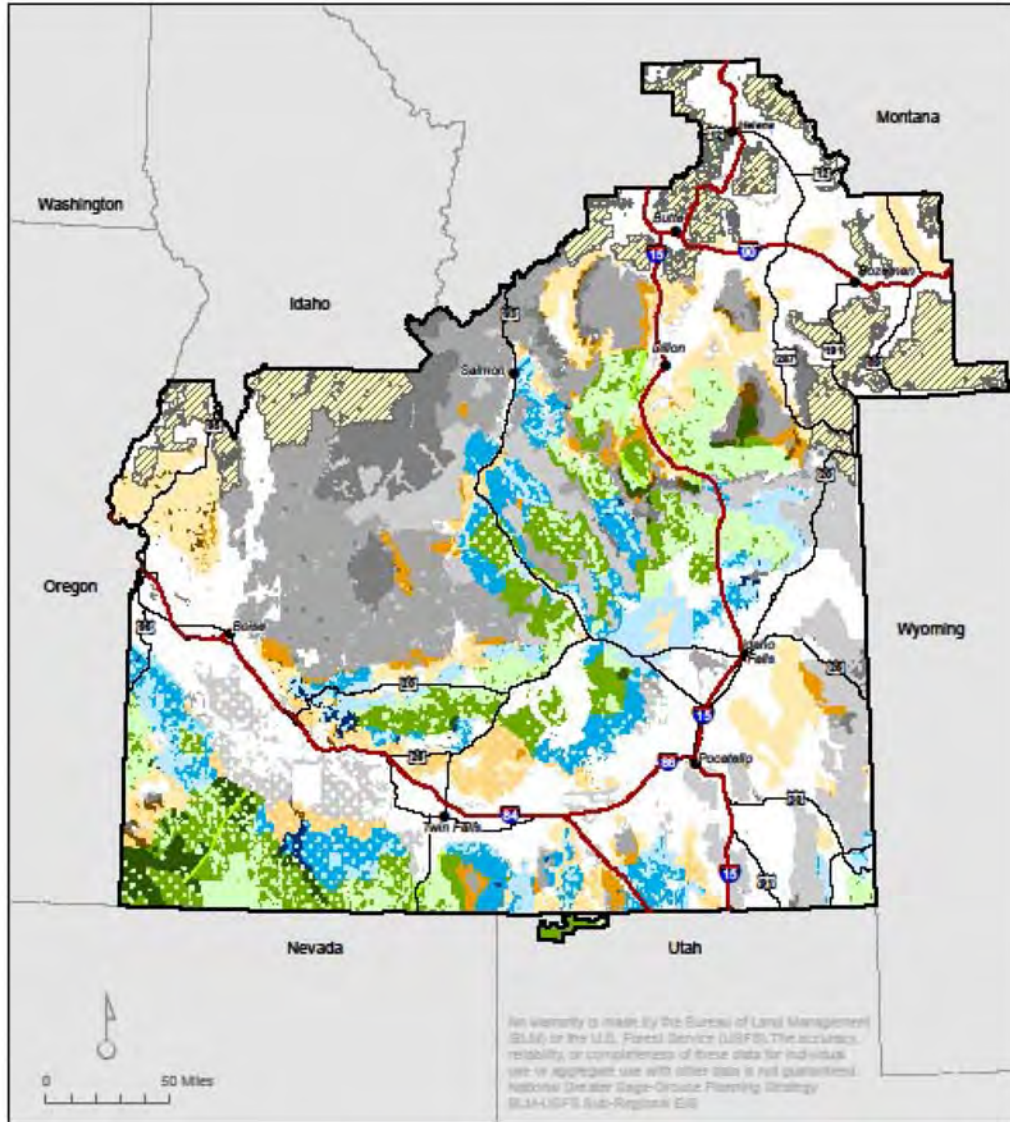
Map 5. Utility Corridor Designations

Alternative G: Designated ROW Corridors



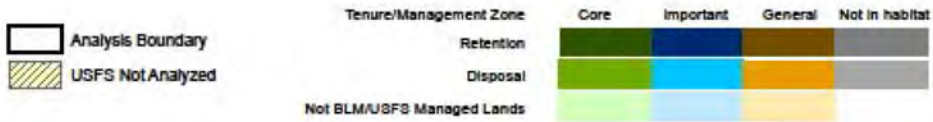
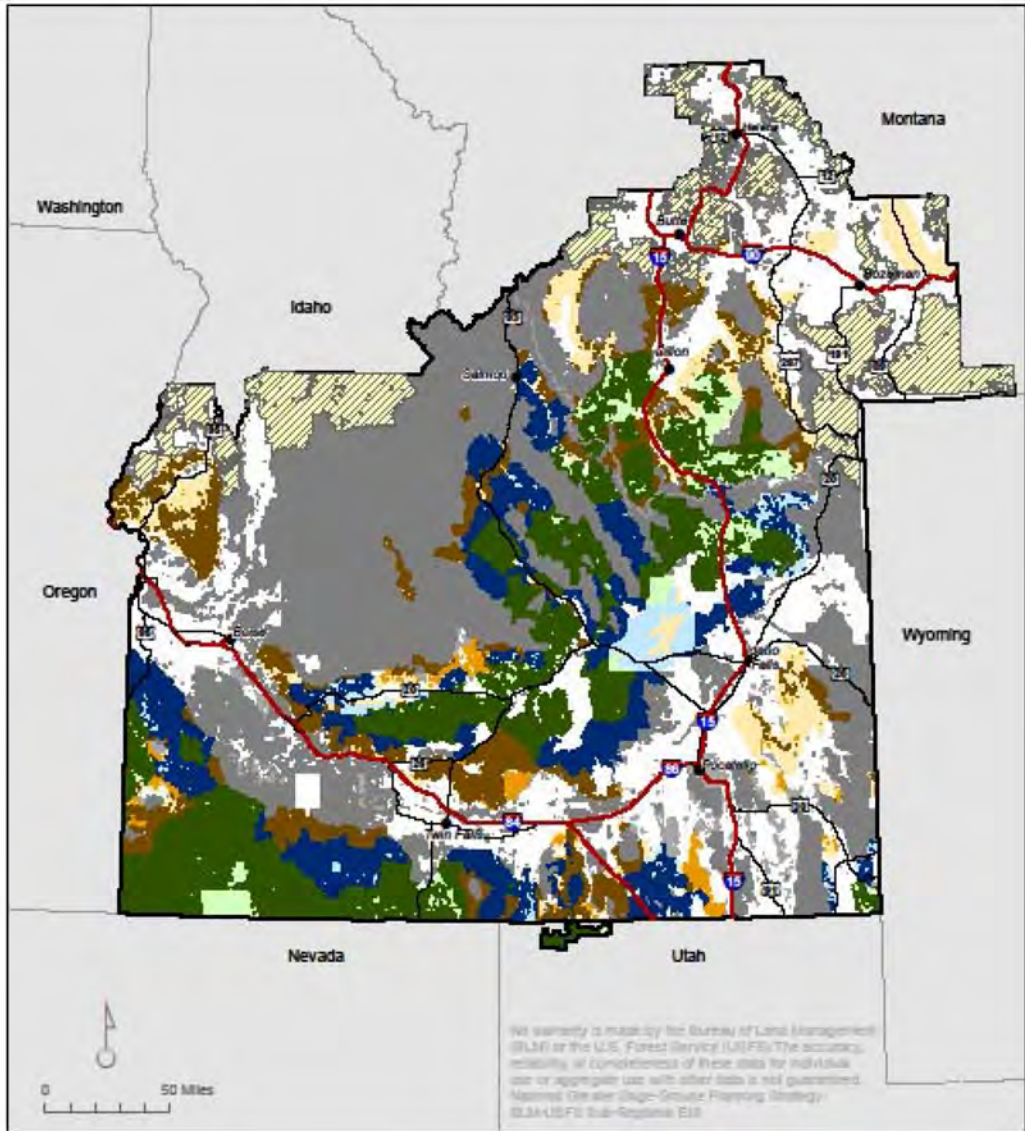
Map 6. Right-of-Way Development Allocations

Alternative G: Major and Minor ROW Constraints



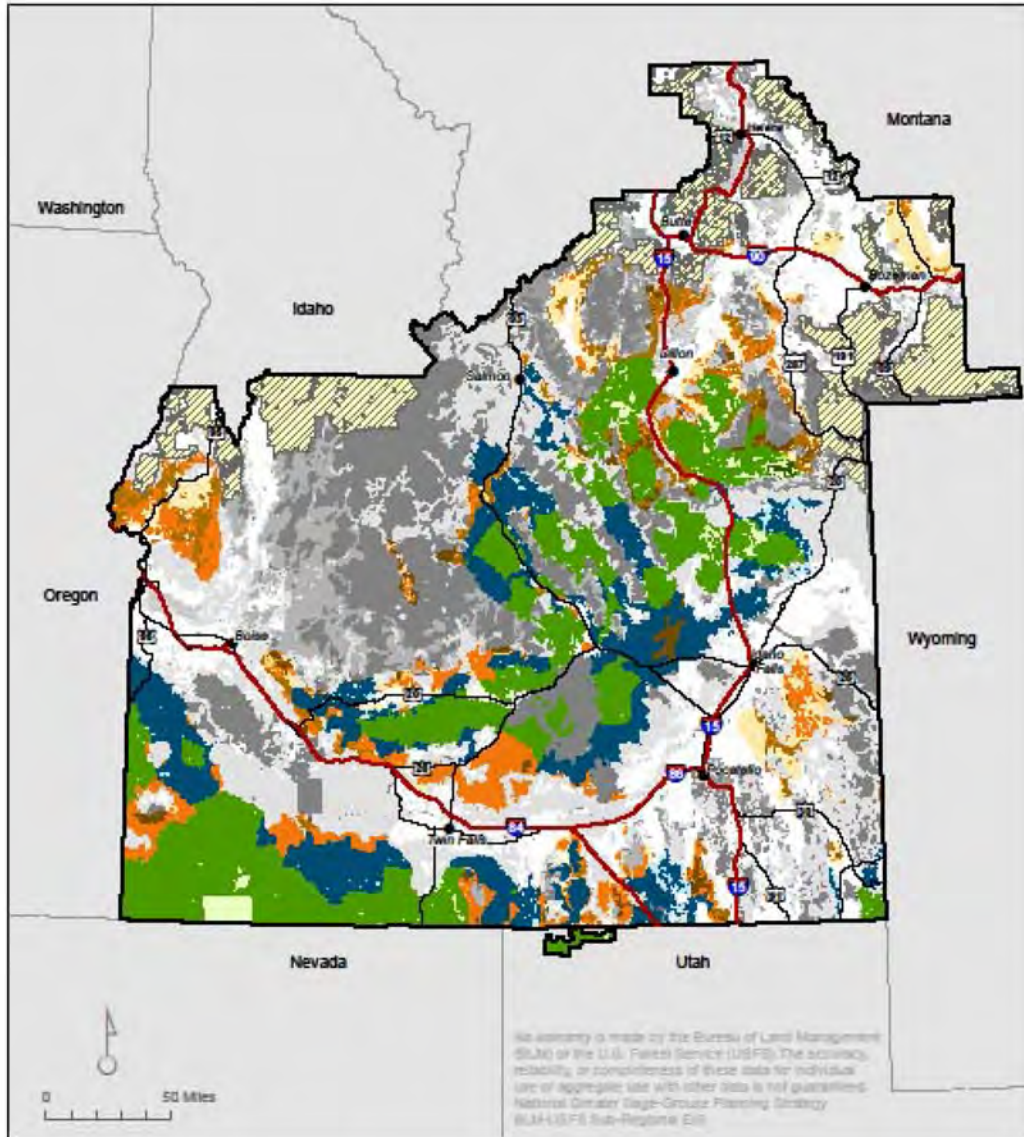
Map 7. Land Tenure Designations

### Alternative G: Land Tenure Adjustments



Map 8. Fluid Mineral Resource Allocations – Oil and Gas

Alternative G: Oil and Gas Constraints



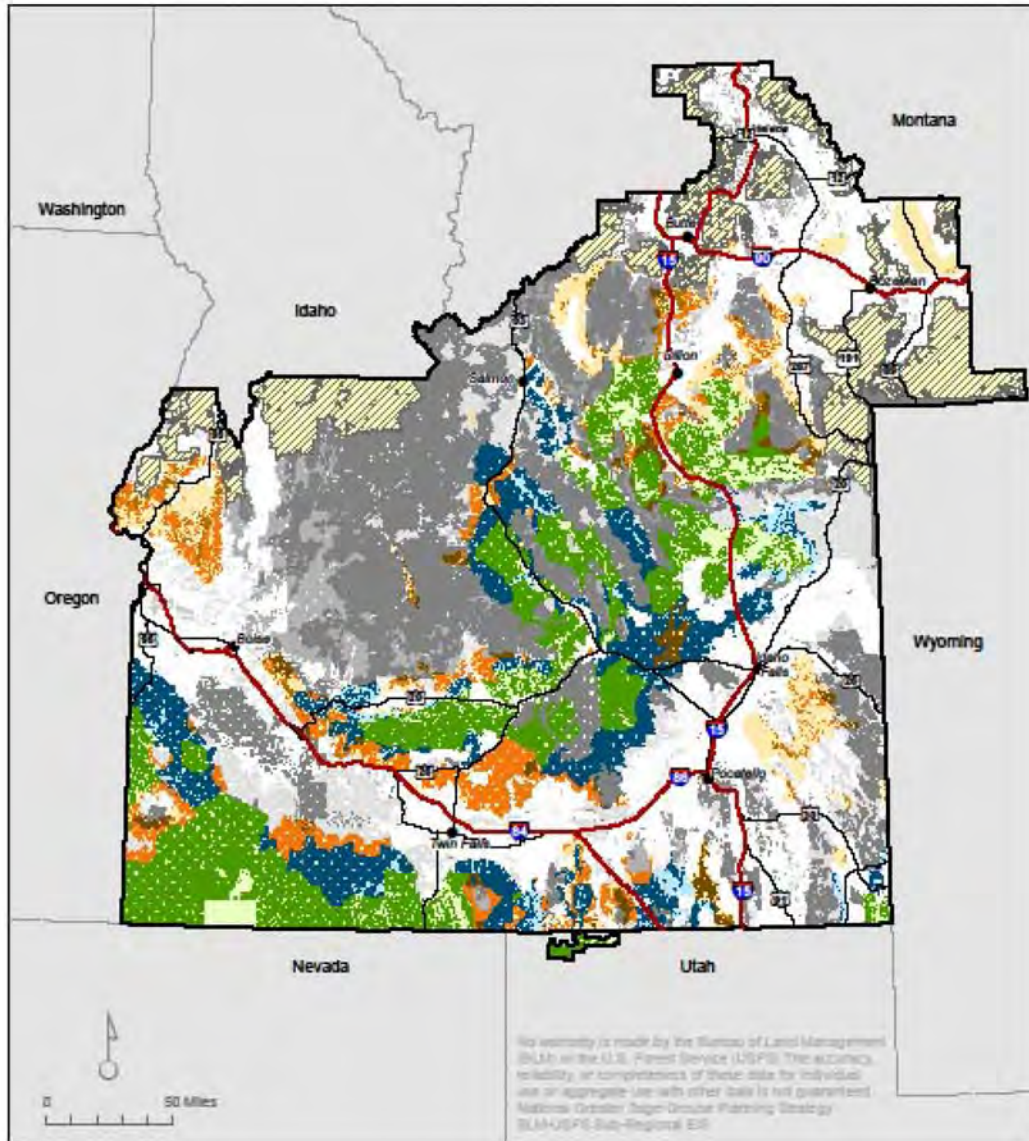
No warranty is made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS). The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed. National Greater Sage-Grouse Planning Strategy BLM-USFS Sub-Regional EIS

Constraints/Management Zone	Core	Important	General	Not in habitat
Closed to Leasing	Dark Green	Dark Blue	Dark Brown	Grey
Open to Leasing, NSO	Light Green	Medium Blue	Orange	Light Grey
Open to Leasing, CSU	Light Green	Light Blue	Light Orange	Light Grey
Open to Leasing, TLS	Light Green	Light Blue	Light Orange	Light Grey
Open to Leasing, standard leasing slips	Light Green	Light Blue	Light Orange	Light Grey
No Federal minerals	Light Green	Light Blue	Light Orange	Light Grey

Analysis Boundary  
USFS Not Analyzed

Map 9. Fluid Mineral Resource Allocations - Geothermal

Alternative G: Geothermal Constraints

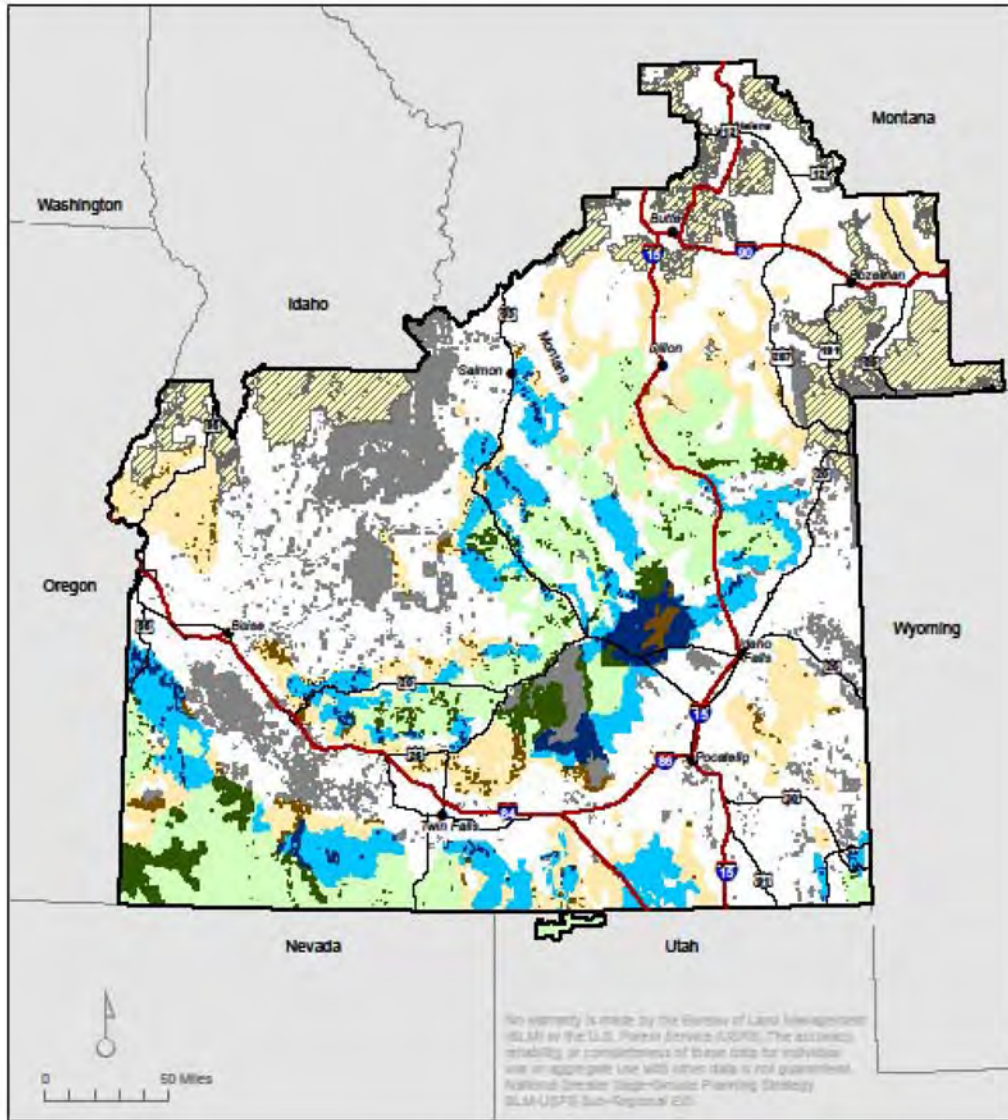


No warranty is made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS) for accuracy, reliability, or completeness of these data for individual use or aggregate use with other data. It is not guaranteed. National Geospatial Data-Driven Planning Strategy BLM-USFS Sub-Regional EIS

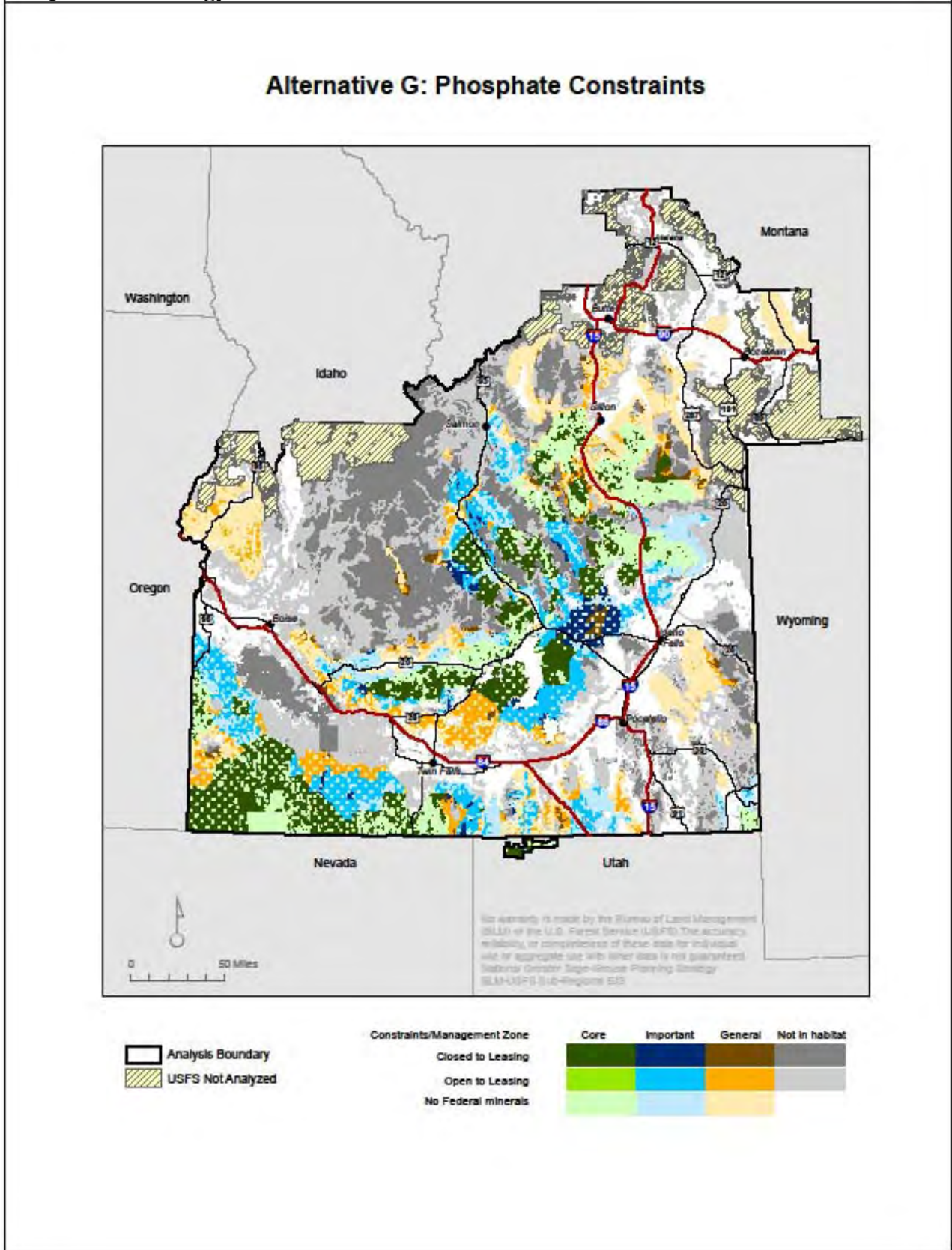
<p>Analysis Boundary</p> <p>USFS Not Analyzed</p>	<p>Constraints/Management Zone</p> <p>Closed to Leasing</p> <p>Open to Leasing, NGO</p> <p>Open to Leasing, C-SU</p> <p>Open to Leasing, TLS</p> <p>Open to Leasing, standard leasing steps</p> <p>No Federal minerals</p>	<table border="1"> <thead> <tr> <th>Core</th> <th>Important</th> <th>General</th> <th>Not in habitat</th> </tr> </thead> <tbody> <tr> <td>Dark Green</td> <td>Dark Blue</td> <td>Dark Brown</td> <td>Grey</td> </tr> <tr> <td>Medium Green</td> <td>Medium Blue</td> <td>Medium Brown</td> <td>Grey</td> </tr> <tr> <td>Light Green</td> <td>Light Blue</td> <td>Light Brown</td> <td>Grey</td> </tr> <tr> <td>Very Light Green</td> <td>Very Light Blue</td> <td>Very Light Brown</td> <td>Grey</td> </tr> </tbody> </table>	Core	Important	General	Not in habitat	Dark Green	Dark Blue	Dark Brown	Grey	Medium Green	Medium Blue	Medium Brown	Grey	Light Green	Light Blue	Light Brown	Grey	Very Light Green	Very Light Blue	Very Light Brown	Grey
	Core	Important	General	Not in habitat																		
Dark Green	Dark Blue	Dark Brown	Grey																			
Medium Green	Medium Blue	Medium Brown	Grey																			
Light Green	Light Blue	Light Brown	Grey																			
Very Light Green	Very Light Blue	Very Light Brown	Grey																			

Map 10. Locatable Minerals Withdrawals

Alternative G: Areas Withdrawn from Locatable Mineral Entry



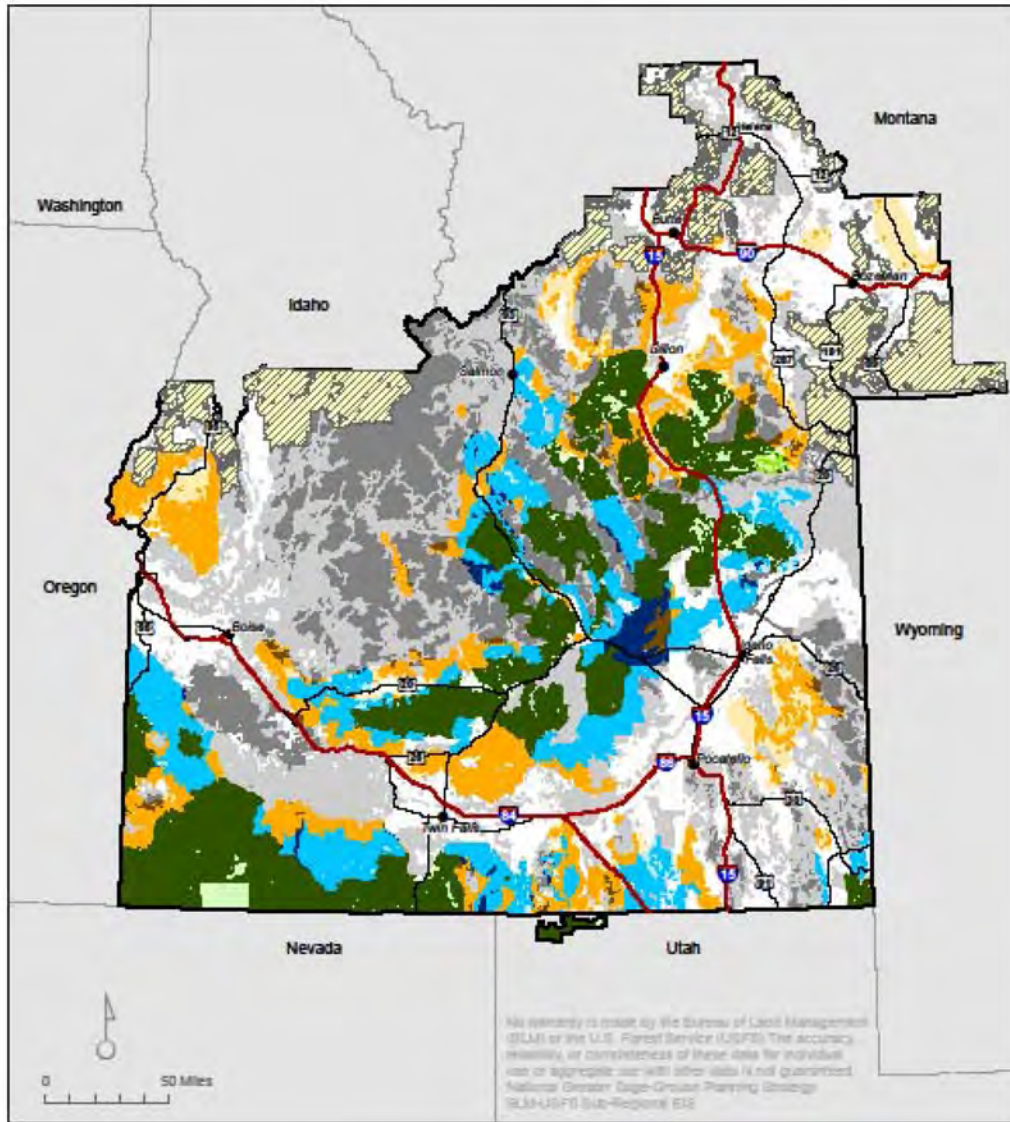
Map 11. Non-Energy Leasable Resource Allocations





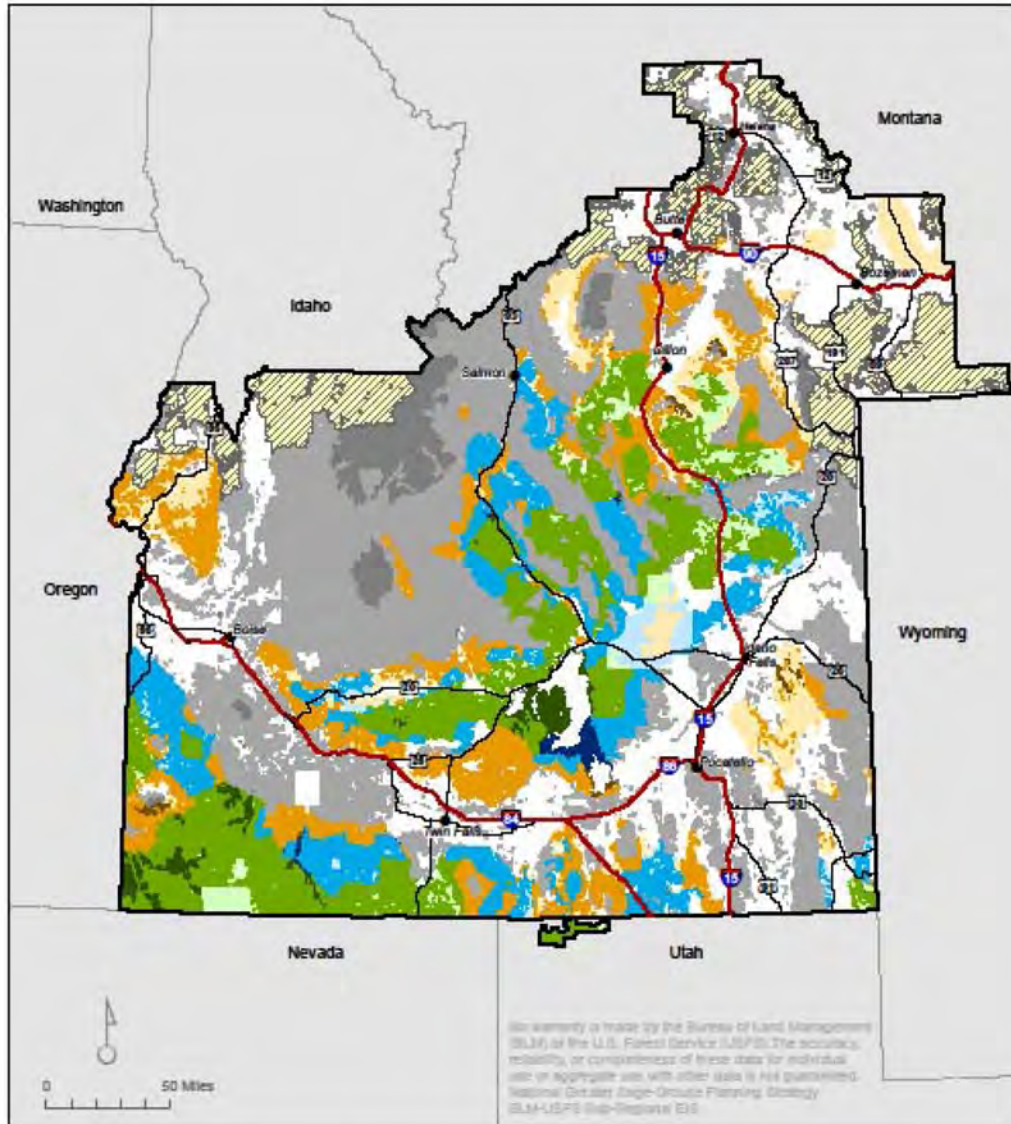
Map 12. Minerals Materials Allocations

Alternative G: Mineral Material Constraints



Map 13. Travel Management Allocations

Alternative G: Travel Management



Designation/Management Zone		Core	Important	General	Not in habitat
Analysis Boundary	Closed to Travel	Dark Green	Dark Blue	Dark Brown	Dark Grey
USFS Not Analyzed	Limited Travel	Light Green	Light Blue	Light Brown	Light Grey
	Open to Travel	Very Light Green	Very Light Blue	Very Light Brown	Very Light Grey
	Not BLM/USFS Managed Lands	White	White	White	White

## **2. Goals and Objectives**

- 2.1. GOAL-1: Maintain and/or increase the abundance, distribution and connectivity of GRSG by conserving, enhancing and restoring GRSG habitat to maintain resilient populations by reducing, eliminating or minimizing threats to GRSG habitats.
- 2.2. GOAL-2: Provide for the needs of GRSG and their habitat while also providing for resource uses in accordance with the agencies' direction for multiple use and sustained yield as described in FLPMA and the NFMA.
- 2.3. GOAL-3: Manage anthropogenic development and human disturbance to minimize the likelihood of adverse population level effects on GRSG.
- 2.4. GOAL-4: Reduce the risk of West Nile Virus or other disease outbreaks from BLM and USFS management actions.
- 2.5. Management Area (MA) - Objective (OBJ)-1: Maintain a resilient population of GRSG in Idaho and Southwestern Montana.
- 2.6. MA-OBJ-2: Designate GRSG management areas and associated management to maintain a resilient population and to designate strategically located adjacent areas to provide a buffer from unpredictable habitat loss such as wildfire to the resilient population areas.
- 2.7. MA-OBJ-3: Identify and strategically protect larger in-tact sagebrush areas and areas of lower fragmentation to maintain GRSG population persistence.
- 2.8. Vegetation (VEG)-OBJ-1: Reconnect and expand areas of higher native plant community integrity/rangeland health to increase the extent of high quality habitat and, where possible, to accommodate the future effects of climate change.
- 2.9. VEG-OBJ-2: Increase the amount and functionality of seasonal habitats by:
  - a. Increasing canopy cover and average patch size of sagebrush in perennial grasslands.
  - b. Increasing the amount, condition and connectivity of seasonal habitats.
  - c. Protecting or improving GRSG migration/movement corridors.
  - d. Reducing conifer encroachment within GRSG seasonal habitats.
  - e. Improving understory (grass, forb) and/or riparian condition within breeding and late brood-rearing habitats.
  - f. Reducing the extent of annual grasslands within and adjacent to Priority and Important Habitat Management Areas.Decadal treatment objectives by population area are identified in Table 2.
- 2.10. Habitat Management (HM)-OBJ-1: Maintain or make progress toward at least 70% of lands within PHMAs and IHMAs capable of producing sagebrush at 10-30% canopy cover and conifers absent to uncommon within 1.86 miles of occupied leks.
- 2.11. HM-OBJ-2: Incorporate GRSG Seasonal Habitat Objectives (Table 3) into the design of projects or activities, as appropriate, based on site conditions and ecological potential, unless achievement of fuels management objectives require additional reduction in sagebrush cover to meet strategic protection of GRSG habitat and conserve habitat quality for the species; unless at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:

A specific objective is not applicable to the site-specific conditions of the project or activity;

An alternative objective is determined to provide equal or better protection for GRSG or its habitat (based on appropriate scientific findings); or Analysis concludes that following a specific objective would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.

- 2.12. FUEL-OBJ-1: Design fuel treatments to restore, enhance, or maintain GRSG habitat.
- 2.13. WHB-OBJ-1: Manage wild horse and burro population levels within the established AML ranges to maintain or enhance GRSG habitat.

**Table 2. Acres of Treatment within a 10-Year Period to Achieve Vegetation Objectives<sup>2</sup>**

Population Area	Mechanical Conifer Treatment	Mechanical Sage	Prescribed Fire	Annual Grass Treatment
Bear Lake Plateau		1000		
East Idaho Uplands	6000		9000	1000
S Central Idaho/N Snake River and Mountain Valleys	4000	14000	11000	162000
Weiser				13000
SW Idaho	48000	4000	10000	444000

**Table 3. Seasonal Habitat Desired Conditions for Greater Sage-Grouse**

ATTRIBUTE	INDICATOR	DESIRED CONDITON
<b>BREEDING HABITAT (LEK AND NESTING/EARLY BROOD REARING)</b>		
Lek Security	Proximity of trees <sup>7,13</sup>	Trees (i.e., mainly juniper, conifers, and does not include old growth juniper, pinyon pine and mountain mahogany) absent or uncommon on shrub/grassland ecological sites within 1.86 miles (3 km) of occupied leks.
	Proximity of sagebrush to leks <sup>13</sup>	Adjacent protective sagebrush cover within

<sup>2</sup> These acreage figures represent an objective for treatment over a ten-year (decadal) timeframe to support achievement or progress toward vegetation and habitat objectives. This accounts for variations in yearly funding availability and does not reflect a maximum acreage for treatment should funding and site specific conditions allow for more or less treatment than described in order to meet vegetation and habitat objectives.

		328 ft (100 m) of an occupied lek
<b>NESTING/EARLY BROOD REARING<sup>5,10,12,13,14</sup></b>		
Cover and Food	Seasonal habitat extent <sup>8</sup>	>80% of the nesting habitat meets the recommended vegetation characteristics, where appropriate (relative to ecological site potential, etc.).
	Sagebrush canopy cover <sup>2,8,9,11</sup>	15-25%
	Sagebrush height <sup>8</sup>	
	Arid sites <sup>3</sup>	12-31 inches (30-80cm)
	Mesic sites <sup>4</sup>	16-31 inches (40-80cm)
	Predominant sagebrush shape <sup>13</sup>	Predominantly spreading shape <sup>5</sup>
	Perennial grass cover <sup>2,8,13</sup>	
	Arid sites <sup>3</sup>	≥10%
Mesic sites <sup>4</sup>	≥15%	
Perennial grass height <sup>8,9,11,13</sup>	<u>Adequate nest cover</u>	
Perennial forb cover <sup>2,8</sup>		
Arid sites <sup>3</sup>	≥5%	
Mesic sites <sup>4</sup>	≥10%	
Perennial forb availability <sup>13</sup>	Preferred forbs are common with several species present <sup>6</sup>	
<b>LATE BROOD-REARING/SUMMER<sup>1</sup> (July-October)<sup>1</sup> (Apply to all habitat outside of nesting/breeding and winter)</b>		
Cover and Food	Seasonal habitat extent <sup>8</sup>	>40% of the summer/brood habitat meets recommended brood habitat characteristics where appropriate (relative to ecological site potential, etc.)
	Sagebrush canopy cover <sup>2,8,</sup>	10-25%
	Sagebrush height <sup>8,</sup>	16 to 32 inches (40-80cm)
	Perennial grass canopy cover <sup>2,8</sup>	>15%
	Upland and riparian perennial forb availability <sup>2,13</sup>	Preferred forbs are common with several preferred species present <sup>6,</sup>
	Riparian meadow habitat condition	Proper Functioning Condition <sup>13</sup>
<b>WINTER<sup>1</sup> November-March<sup>1</sup> (Apply to areas of known or likely winter-use)</b>		
Cover and Food	Seasonal habitat extent <sup>8</sup>	>80% of the wintering habitat meets winter habitat characteristics where appropriate (relative to ecological site, etc.).
	Sagebrush canopy cover above snow <sup>2,8,13</sup>	>10%
	Sagebrush height above snow <sup>8</sup>	>10 inches (>25cm)
<b>NOTES AND REFERENCES</b>		
<p><sup>1</sup> Seasonal dates can be adjusted by local unit according to geographic region.</p> <p><sup>2</sup> Absolute cover is the actual recorded cover and can exceed 100% when recorded across all species and all layers. It is not relative cover, which is the proportions of each species, and equals 100%. Note that cover is reported for only those species (e.g., sagebrush, preferred forbs) that are sampled to determine suitability of habitat for sage-grouse. Overall cover at the site will be greater than that sampled for sage-grouse habitat, due to other species present.</p> <p><sup>3</sup> Arid corresponds to the 10 – 12 inch precipitation zone; <i>Artemisia tridentata wyomingensis</i> is a common big sagebrush sub-species for this type site (Stiver et al. <i>In Press</i>).</p> <p><sup>4</sup> Mesic corresponds to the ≥12 inch precipitation zone; <i>Artemisia tridentata vaseyana</i> is a common big</p>		

sagebrush sub-species for this type site (Stiver et al. *In Press*).

<sup>5</sup>Collectively the indicators for sagebrush (cover, height, and shape), perennial grass and perennial forb (cover, height and/or availability) represent the desired condition range for nesting/early brood rearing habitat characteristics, consistent with the breeding habitat suitability matrix identified in Stiver et al. *In Press*.

Sagebrush plants that are more tree or columnar-shaped provide less protective cover near the ground than sagebrush plants with a spreading shape (Stiver et al. *In Press*). Some sagebrush plants are naturally columnar (e.g., Great Basin big sagebrush), and a natural part of the plant community. However, a predominance of columnar shape arising from animal impacts may warrant management investigation or adjustments at site specific scales.

<sup>6</sup> Preferred forbs are listed in Stiver et al. *In press* . Overall total forb cover may be greater than that of preferred forb cover since not all forb species are listed as preferred.

<sup>7</sup>Baruch-Mordo, S., J. S. Evans, J. P. Severson, D. E. Naugle, J. D. Maestas, J. M. Kiesecker, M. J. Falkowski, C. A. Hagen, and K. P. Reese. 2013. Saving sage-grouse from trees.

<sup>8</sup> Connelly, J. W., M. A. Schroeder, A. R. Sands, and C. E. Braun. 2000. Guidelines to manage sage-grouse populations and their habitats. *Wildlife Society Bulletin* 28:967-985.

<sup>9</sup>Connelly, J. W., K. P. Reese, and M. A. Schroeder. 2003. Monitoring of Greater sage-grouse habitats and populations. University of Idaho College of Natural Resources Experiment Station Bulletin 80. University of Idaho, Moscow, ID.

<sup>10</sup>Doherty, K. 2008. Sage-grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts. Ph.D. Dissertation. University of Montana, Missoula, MT.

<sup>11</sup> Hagen, C. A., J. W. Connelly, and M. A. Schroeder. 2007. A meta-analysis of greater sage-grouse *Centrocercus urophasianus* nesting and brood-rearing habitats. *Wildlife Biology* 13 (Supplement 1):42-50.

<sup>12</sup>Holloran, M. J., and S. H. Anderson. 2005. Spatial Distribution of Greater Sage-grouse nests in relatively contiguous sagebrush habitats. *Condor* 107:742-752.

<sup>13</sup>Stiver, S. J., E. T. Rinkes, D. E. Naugle, P. D. Makela, D. A. Nance, and J. W. Karl. *In Press*. Sage-Grouse Habitat Assessment Framework: Multi-scale Habitat Assessment Tool. Bureau of Land Management and Western Association of Fish and Wildlife Agencies Technical Reference XXXX-X. U.S. Bureau of Land Management, Denver, Colorado.

<sup>14</sup> Connelly, J.W., A. Moser, and D. Kemner. 2013. Greater Sage-Grouse breeding habitats: Landscape-based comparisons. *Grouse News* 45. Research Reports.

### **3. Coordination**

- 3.1.** CC-1: Collaborate, coordinate and utilize cooperative planning efforts to implement and monitor activities to achieve desired conditions and to maximize the utilization of available funding opportunities. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, public lands permit holders and non-governmental organizations.
- 3.2.** CC-2: Develop a cooperative MOU between the BLM, Forest Service and State of Idaho to establish the State of Idaho as a cooperating agency during implementation of the final decision. The MOU would identify responsibilities, role and interaction of the BLM, FS and Task Team. Montana BLM will participate as appropriate on Montana's Sage-grouse Oversight Team to facilitate coordinated and implementation of BLM's final decision and Montana's forthcoming sage-grouse conservation strategy.
- 3.3.** CC-3: The BLM and Forest Service would consider any recommendations from the Governor of Idaho as a result of evaluation completed by the Sage-Grouse Implementation Task Force.
- 3.4.** CC-4: The BLM and Forest Service would coordinate with the State of Idaho and Montana and the Idaho Sage-Grouse Implementation Task Force and Montana Sage-grouse Oversight Team regarding proposed management changes, the implementation of conservation measures, mitigation, and site-specific monitoring, related to adaptive management and livestock grazing (Appendix O).
- 3.5.** CC-5: Upon completion of the Record of Decision the BLM will develop an Implementation Guide for BLM District and Field Offices to define and describe consistent application of the allocations, management actions, required design features, and etc. that are contained within the final plan.
- 3.6.** CC-6: At the state level, BLM and Forest Service would coordinate with IDFG, MFWP, USFWS, and other conservation partners in collaborative efforts with adjacent states (Oregon, Nevada, Utah, Montana, Wyoming) in GRSG MZs IV and II to evaluate GRSG habitat and population status and trends and make appropriate recommendations for GRSG conservation at broader scales.
- 3.7.** CC-7: At the state level, BLM and Forest Service would coordinate with appropriate WAFWA Sage-grouse Technical Committee to develop consistent population and habitat monitoring approaches that facilitate GRSG conservation at the MZ scale.
- 3.8.** CC-8: All prescribed burning would be coordinated with state and local air quality agencies to ensure that local air quality is not significantly impacted by BLM and Forest Service activities.

#### 4. Greater Sage-Grouse Management Areas

- 4.1. Management Area (MA)-1: Designate five GRSG Conservation Areas within the sub-region to form the geographic basis for achieving population objectives; evaluating the disturbance density and adaptive regulatory triggers; and tailor adaptive management responses. These conservation areas are depicted in Map 1. These areas are referred to as Mountain Valleys, Desert, West Owyhee, Southern and Southwestern Montana Conservation Areas.

##### Conservation Area Description:

Mountain Valleys Conservation Area – generally located north of the Snake River Plain, and includes habitat in west-central population area. It extends west from Rexburg, north and west of Highway 33 to Howe, north and west of Highway 33/22 to Arco, north and west of Highway 26/20/93 to Carey, north and west of Highway 20 west to Hill City, north and west of Highway 20 to the Dylan Karaus Road, west to Canyon Creek. Canyon Creek to the confluence with the Snake River form the western boundary.

Desert Conservation Area – located north of the Snake River and south of the Mountain Valleys Conservation Area. It extends from the confluence of Canyon Creek and the Snake River, eastward to Idaho Falls. The Snake River and Henry's Fork form the eastern boundary.

West Owyhee Conservation Area – located south of the Snake River and west of the Bruneau River.

Southern Conservation Area – located south of the Snake River and east of the Bruneau River, including East Idaho uplands and Bear Lake Plateau, and the Utah portion of the Sawtooth National Forest in Box Elder County.

Southwestern Montana – located in southwestern Montana - encompassing the Dillon and Butte BLM Field Office boundaries.

Additionally, sage-grouse habitats in the Desert and West Owyhee CAs are relatively contiguous, while those in the Mountain Valleys and Southern CAs tend to be more fragmented due to topography, elevational and land use differences.

- 4.2. MA-2: Within each Conservation Area (CA) designate GRSG Habitat Management Areas: Priority, Important and General Habitat Management Areas (Map 2). **Priority Habitat Management Areas (PHMAs)** focus on conserving the two key meta-populations in the sub-region. These meta-populations consist of a large aggregation of interconnected breeding subpopulations of GRSG that have the highest likelihood of long-term persistence. The PHMA encompasses areas with the highest conservation value to GRSG, based on the presence of larger leks, habitat extent, important movement and connectivity corridors and winter habitat. Priority Habitat Management Areas include adequate area to accommodate continuation of existing land uses and landowner activities. **Important Habitat Management Areas (IHMAAs)** contain additional high value habitat and populations that provide a



management buffer for the PHMA, connect patches of PHMA. The IHMA encompasses areas of generally moderate to high conservation value habitat and/or populations and in some CAs includes areas beyond those identified by USFWS as necessary to maintain redundant, representative and resilient populations (Priority Areas for Conservation (PACs)). The IHMAs are typically adjacent to PHMAs but generally reflect somewhat lower GRSG population status and/or reduced habitat value due to disturbance, habitat fragmentation or other factors. There are no IHMAs designated within the Southwestern Montana CA. **General Habitat Management Areas (GHMAs)** encompass habitat that is outside of PHMAs or IHMAs. It is generally characterized by more marginal habitat and few, if any, occupied leks or other important seasonal use areas.

- 4.3. MA-3: Delineate PHMA and IHMA to encompass 90% of the breeding males in Idaho.
- 4.4. MA-3: Annually prioritize Conservation Areas at the state scale considering results of the annual adaptive regulatory trigger evaluations relative to implementation of restoration and mitigation activities.
- 4.5. MA-4: Prioritize activities and mitigation to protect, enhance and restore GRSG habitats (i.e. suppression activities, fuels management activities, vegetation treatments, invasive species treatments, etc.) first by Conservation Area, if appropriate (CA under adaptive management or at risk of engaging adaptive management), followed by Priority Habitat Management Areas, then Important Habitat Management Areas then General Habitat Management Areas within the Conservation Areas. Local priority areas within these areas will be further refined as a result of completing the GRSG Wildfire and Invasive Species Habitat Assessments as described in Appendix D. This could include projects outside GRSG habitat when those projects would provide a benefit to GRSG habitat. Priority restoration and mitigation areas are restoration areas identified on the Key Habitat map (R1, R2, R3 and Recent Burn) within nesting and wintering areas in Priority and Important Habitat Management Areas.
- 4.6. MA-5: The management area map and biologically significant unit baseline map would be re-evaluated in conjunction with plan evaluation processes (i.e. approximately every 5 years). This re-evaluation could indicate the need to adjust Priority, Important or General Habitat Management Areas or the habitat baseline. These adjustments could occur upon completion of the appropriate analysis (plan amendment) to review the allocation decisions based on the map.
- 4.7. MA-6: The functionality and capability of GRSG habitat within the project area would be assessed during project-level NEPA analysis within the management area designations (Priority, Important, General) and appropriate updates to the Key Habitat map would occur. Areas without the potential and capability to provide GRSG habitat would be identified, areas with the potential to provide GRSG habitat would be appropriately classified on the Key Habitat map. Project proposals and their effects would be evaluated based on the habitat and values affected.
- 4.8. MA-7: Idaho BLM will annually update the Key Habitat map as described in Appendix F, in order to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. Updates to the map will also occur if it is determined that mapping errors or omissions have occurred, or that radio-telemetry studies indicate that sage-grouse are

consistently utilizing an area. Updates are also intended to capture recommendations by the field offices, sage-grouse Local Working Groups (LWG), or agency partners in sage-grouse conservation.

- 4.9.** MA-8: Areas of habitat outside of delineated management areas identified during the Key habitat update process would be evaluated during site specific NEPA for project level activities and GRSG required design features (Appendix A), seasonal timing restrictions (Appendix B) and buffers (Appendix C) would be included as part of project design. These areas would be further evaluated during plan evaluation to determine whether they should be included as Priority, Important or General Habitat Management Areas.

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## **5. Adaptive Management**

- 5.1. Adaptive Management (AM)-1: Idaho: Use hard and soft population and habitat triggers, evaluated within a Conservation Area, to determine an appropriate management response.
- 5.2. AM-2: Utilize monitoring information collected through the Monitoring Framework Plan (Appendix E) to determine when adaptive regulatory triggers have been met.
- 5.3. AM-3: Idaho: BLM and Forest Service would maintain GRSG habitat information, through use of the Key Habitat map or latest sagebrush/vegetation map, which would be used to track and identify habitat changes to assess the habitat trigger in the adaptive management approach. Key habitat map updates are made each winter by BLM in coordination with the FS and Idaho Department of Fish and Game (IDFG), using the process described in Appendix F.
- 5.4. AM-4: BLM and Forest Service would utilize population information collected and maintained by the Idaho Department of Fish and Game to track and identify population changes to assess the population trigger in the adaptive management approach...
- 5.5. AM-5: Twice each year the applicable monitoring information would be reviewed to determine if any adaptive management criteria have been met.
- 5.6. AM-6: Adaptive regulatory triggers would be individually calculated across all ownerships within the biologically significant units (BSU). The BSU is defined as the Idaho Department of Fish and Game modeled nesting and wintering habitat within Priority and Important Habitat Management Areas within a Conservation Area. The sagebrush component of the BSU is represented by the key habitat within the BSU.
- 5.7. AM-7: Adaptive Regulatory Criteria for Hard Habitat Triggers are defined as:
  - A 20 percent loss of Key Habitat within the biologically significant unit (BSU) (Appendix G) of the PHMA of a CA when compared to the 2011 baseline (the BSU is defined as the nesting and wintering habitat within a Priority and Important Habitat Management Areas (separately) within a Conservation Area, inclusive of all ownerships); or
  - A 20 percent loss of Key Habitat within the BSU of the IHMA of a CA when compared to the 2011 baseline.
- 5.8. AM-8: Adaptive Regulatory Criteria for Soft Habitat Triggers are defined as:
  - A 10 percent loss of Key Habitat within the BSU of the PHMA of a CA when compared to the 2011 baseline; or
  - A 10 percent loss of Key Habitat within the BSU of the IHMA of a CA when compared to the 2011 baseline.
- 5.9. AM-9: Adaptive Regulatory Criteria for Hard Population Triggers are defined as: A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within PHMA within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline; or A 20 percent decline in maximum number of males counted and a finite rate of change significantly below 1.0 within IHMA within a CA over a period of 3 consecutive years compared to the 2009-2011 baseline.
- 5.10. AM-10: Adaptive Regulatory Criteria for Soft Population Triggers are defined as:

A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within PHMA within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011; or

A 10 percent decline in maximum number of males counted and a finite rate of change below 1.0 within IHMA within a CA over a period of 3 years when compared to the average finite rate of change from 2009-2011.

- 5.11. AM-11: When any of the Adaptive Regulatory Criteria for Soft Triggers have been met the Implementation Team would evaluate causal factors and recommend additional potential implementation level activities Appendix G.
- 5.12. AM-12: When any of the Adaptive Regulatory Criteria for Hard Triggers have been met then PHMA management actions would be applied to the IHMA within that CA.
- 5.13. AM-13: If an adaptive regulatory trigger is tripped and livestock grazing is identified as a probable limiting factor then adjustments would follow the Adaptive Grazing Management Response described in Appendix G.
- 5.14. AM-14: Remove any adaptive management response when the habitat or population information shows a return to or an exceedance of baseline values within the associated CA.
- 5.15. **Montana Adaptive Management:**

## **6. Anthropogenic Disturbance**

- 6.1.** Anthropogenic Disturbance (AD)-1: Limit anthropogenic disturbance to 3 percent as calculated within the biologically significant unit (BSU) (Map 3). The BSU is defined as the nesting and wintering habitat within Priority and Important Habitat Management Areas within a Conservation Area, inclusive of all ownerships for evaluation. Anthropogenic disturbance excludes habitat disturbance from wildfire and fuels management activities and includes activities described in Table X. For Idaho this disturbance is measured by direct footprint or by ROW width for linear features (powerlines, pipelines and roads). For Montana this disturbance is measured utilizing the Disturbance Density Calculation Tool process described in Appendix H.
- 6.2.** AD-2: New anthropogenic disturbances within Priority or Important Habitat Management Areas within a CA where the disturbance cap is already exceeded from any source or where the proposed development would result in the cap being exceeded would not be allowed until enough habitat has been restored to maintain the area under this cap (subject to valid existing rights).
- 6.3.** AD-3: Priority Habitat Management Area: Anthropogenic Disturbance Exception Criteria. In order to avoid surface-disturbing activities in Priority Habitat Management Areas, priority will be given to development (including ROWs, fluid minerals and other mineral resources subject to applicable stipulations) outside of Priority Habitat Management Areas. When authorizing development in Priority Habitat Management Areas, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse. In addition to the Priority and Important Habitat Management Area Anthropogenic Disturbance Development Criteria (AD-4), the following criteria must all be met in the project screening and assessment process:
- a. The population trend for the GRSG within the associated Conservation Area is stable or increasing over a three-year period and the population levels are not currently engaging the adaptive management triggers (this applies strictly to new authorizations; renewals and amendments of existing authorizations would not be subject to this criteria when it can be shown that long-term impacts from those renewals or amendments would be substantially the same as the existing development);
  - b. The development with associated mitigation would not result in a net loss of GRSG Key habitat and mitigation would provide a net conservation benefit to the respective Priority Habitat Management Area;
  - c. The project would not result in a net loss of GRSG Key habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant CA (the project would be outside Key habitat in areas not meeting desired habitat conditions or the project would provide a benefit to habitat areas that are functioning in a limited way as habitat);
  - d. Cannot be reasonably accomplished outside of the Priority Habitat Management Area; or can be either: 1) developed pursuant to a valid existing authorization; 2) is an incremental upgrade/capacity increase of existing development (i.e. powerline capacity upgrade) ; or 3) is co-located within the footprint of existing infrastructure (i.e. powerlines) (proposed actions would not increase the 2011 authorized footprint and associated impacts more than fifty percent (50%), depending on industry practice.

- e. Development could be implemented adhering to the required design features (RDF) described in Appendix A;
  - f. The project would not exceed the disturbance cap (AD-1).
  - g. The project has been reviewed by the State Implementation Team and recommended for consideration by the Idaho Governor.
- 6.4.** AD-4: Priority and Important Habitat Management Areas: Anthropogenic Disturbance Development Criteria – the following criteria must be met in the screening and assessment process:
- a. The project cannot reasonably be achieved, technically or economically, outside of this management area; and
  - b. The project siting and/or design should best reduce cumulative impacts and/or impacts on GRSG and other high value natural, cultural, or societal resources; this may include co-location within the footprint for existing infrastructure, to the extent practicable; and
  - c. The project does not result in a net loss of GRSG Key habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant CA; and
  - d. The project design mitigates unavoidable impacts through appropriate compensatory mitigation; and
  - e. The project complies with the applicable RDFs as described in Appendix A.
  - f. The project would not exceed the disturbance cap (AD-1).
- 6.5.** AD-5: Co-locating new infrastructure within existing ROWs and maintaining and upgrading ROWs is preferred over the creation of new ROWs or the construction of new facilities in all management area. Colocation for various activities is defined as:
- Communication Sites – The installation of new equipment/facilities on or within or adjacent to existing authorized equipment/facilities or within a communication site boundary as designated in the Communication Site Plan.
- Electrical Lines – Installation of new rights-of-way (ROWs) adjacent to current ROWs boundaries, not necessarily placed on the same power poles.
- Other Rights-of-Way – The installation of new rights-of-way (ROWs) within the existing footprint of an approved ROW boundary or adjacent to an approved ROW boundary.
- Designated Corridors – The installation of new rights-of-way within the existing corridor or adjacent to the existing corridor.
- 6.6.** AD-6: Incorporate required design features (RDFs) as described in Appendix A in the development of project or proposal implementation, reauthorizations or new authorizations and suppression activities, as conditions of approval into any post-lease activities and as best management practices for locatable minerals activities, to the extent allowable by law, unless at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:
- A specific RDF is not applicable to the site-specific conditions of the project or activity;

- A proposed design feature or BMP is determined to provide equal or better protection for GRSG or its habitat; or
  - Analysis concludes that following a specific RDF would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.
- 6.7. AD-7: Conduct implementation and project activities, including construction and short-term anthropogenic disturbances consistent with seasonal habitat restrictions described in Appendix B.
- 6.8. AD-8: Required Design Features and seasonal habitat restrictions would not be required for emergency or short-term activities necessary to protect and preserve human life or property.
- 6.9. AD-9: Incorporate appropriate buffers into implementation and project design to avoid and minimize impacts to GRSG described in Appendix C.

Table X. Anthropogenic Disturbances and Areas of Impact

Datasets as Described in the Monitoring Framework <sup>3</sup>
Oil and Gas Wells and Development Facilities
Coal Mines
Wind Towers
Solar Fields
Geothermal Development Facilities
Mining (Active Locatable, Leasable and Saleable Developments)
Roads
Railroads
Powerlines
Communication Towers
Other Vertical Structures
Additional Local Datasets (need definitions)
Underground Pipelines
Coal Bed Methane Ponds
Meteorological Towers
Nuclear Energy Facilities
Airports
Military Ranges (ground based?)
Hydropower plants
Recreation Areas (Developed)

<sup>3</sup> Taken from Table 6 – GRSG Monitoring Framework.

## **7. Mitigation**

- 7.1. Mitigation (MIT)-1: BLM and USFS would establish an inter-agency GRSG Conservation Board at the state level (both Idaho and Montana) to oversee GRSG Conservation.
- 7.2. MIT-2: The BLM and USFS, in coordination with the GRSG Conservation Board would develop a State Mitigation Strategy. In Idaho this strategy would be consistent with the Idaho Mitigation Framework (Appendix I).
- 7.3. MIT-3: Mitigate impacts from anthropogenic developments (Appendix G Table G-1) to GRSG habitats to a net conservation benefit (benefits more birds) by first avoidance of impacts, minimizing impacts and then compensating for impacts.
- 7.4. MIT-4: Mitigate anthropogenic development (Appendix G Table G-1) impacts to a no net loss of Key habitat standard (Appendix I) through application of appropriate mitigation in accordance with the Mitigation Framework (Appendix I), referred to as no unmitigated loss.
- 7.5. MIT-5: Mitigate anthropogenic development (Appendix G Table G-1) impacts to GRSG habitat through application of appropriate mitigation in accordance with the Mitigation Framework (Appendix I).
- 7.6. MIT-6: Consistent with regulations for minerals activities, require a full reclamation bond specific to the site when surface disturbing activities are proposed. Ensure reclamation bonds are sufficient to cover costs to fully rehabilitate lost GRSG habitat. Base the reclamation costs on the assumption that contractors for the BLM will perform the work. Areas are considered fully rehabilitated when they meet the conditions described in Table 3.



## **8. Wildfire Preparedness/Prevention**

- 8.1. Wildfire Preparedness (WFP)-1: Support development and implementation of Rangeland Fire Protection Associations (RFPAs) in coordination with the State of Idaho.
- 8.2. WFP-2: Develop a consistent approach to fire restrictions within GRSG habitat through the existing coordinated inter-agency approach to fire restrictions based upon National Fire Danger Rating System thresholds (fuel conditions, drought conditions, and predicted weather patterns).
- 8.3. WFP-3: Annually incorporate into existing fire management plans results and updates from the Wildfire and Invasive Species Habitat Assessments (FIAT Assessments) described in Appendix D, to communicate/explain the resource value of GRSG habitat, including fire prevention messages and actions to reduce human-caused ignitions.
- 8.4. WFP-4: Continue to participate with the Wildland Fire Leadership Council, a cooperative, interagency organization dedicated to achieving consistent implementation of the goals, actions, and policies in the National Fire Plan and the Federal Wildland Fire Management Policy.
- 8.5. WFP-5: Continue annual coordination meetings held between cooperating agencies that have fire suppression responsibilities. Incorporate Rangeland Fire Protection Associations and other stakeholders into this coordination. Discuss priority suppression areas and distribute maps showing priority suppression areas at both the Conservation Area and the local office levels as based on the adaptive management strategy and FIAT Assessments.
- 8.6. WFP-6: Ensure firefighter personnel receive annual orientation regarding GRSG habitat and sagebrush management issues as related to wildfire suppression.
- 8.7. WFP-7: As part of the FIAT Assessments, identify roads, trails, and recreational use areas with high frequency of human caused fires within or adjacent to the Priority or Important Habitat Management Areas. Consider these areas during annual fire restriction evaluations, and as appropriate, through site specific management.
- 8.8. WFP-8: Coordinate with Federal, State and local jurisdictions on fire and litter prevention programs to reduce human caused ignitions.
- 8.9. WFP-9: Implement activities identified within the FIAT Assessments.

## **9. Wildfire Suppression**

- 9.1.** WFS-1: Complete Wildland Fire and Invasive Species Assessments (FIAT Assessments) as described within Appendix D and incorporate results into appropriate Fire Management Plans as they are completed. FIAT Assessments are interdisciplinary evaluations of the threats posed by wildfire and invasive species, as well as identification of priority areas/treatment opportunities for fuels management, fire management, and restoration. These FIAT Assessments identify priority areas and describe strategies for fuels management, suppression and restoration activities.
- 9.2.** WFS-2: As part of the FIAT Assessments incorporate a wildfire response time analysis focusing on response time to identified priority areas within Priority and Important Habitat Management Areas or on those fires that have the potential to impact Priority and Important Habitat Management Areas. Incorporate findings into Unit Initial Attack program
- 9.3.** WFS-3: As part of the FIAT Assessment incorporate a water capacity analysis for suppression purposes, including potential private water sources. Provide water availability to respond to fire in or threatening PHMA and IHMA during initial attack.
- 9.4.** WFS-4: During high fire danger conditions, stage initial attack and secure additional resources closer to priority areas identified in the FIAT Assessments, based on anticipated fires and weather conditions, with particular consideration of the West Owyhee, Southern and Desert Conservation Areas to ensure quicker response times in or near GRSG habitat after considerations and placement of resources to protect human life and property.
- 9.5.** WFS-5: Utilize a full range of fire management strategies and tactics through strategic wildfire suppression planning consistent with appropriate management response and within acceptable risk levels, to achieve resource objectives for GRSG habitat consistent with land use plan direction. Utilizing both direct and indirect attack as appropriate to limit the overall amount of GRSG habitat burned. This could include suppressing fires in intact sagebrush habitats; limiting fire growth in General Habitat Management Areas when suppression resources are available or managing wildfire for resource benefit in areas of conifer (juniper) encroachment.
- 9.6.** WFS-6: Suppression priorities: Firefighter and public safety followed by property are the highest priority for protection during suppression activities. Maintaining GRSG habitat will be prioritized immediately after human life and property, commensurate with threatened and endangered species habitat or other critical habitats to be protected.
- 9.7.** WFS-7: Ensure close coordination with federal and state firefighters including the Rangeland Fire Protection Associations during suppression activities.

## **10. Fuels Management**

- 10.1.** FM-1: Design and implement fuels treatments that would reduce the potential start and spread of unwanted wildfires and provide anchor points or control lines for the containment of wildfires during suppression activities with an emphasis on maintaining, protecting, and expanding sagebrush ecosystems and successfully rehabilitated areas and strategically and effectively reduce wildfire threats in the greatest area.
- 10.2.** FM-2: Enhance (or maintain/retain) sagebrush canopy cover and community structure to match expected potential for the ecological site and consistent with GRSG habitat objectives unless fuels management objectives requires additional reduction in sagebrush cover to meet strategic protection of GRSG habitat. Closely evaluate the benefits of the fuel management treatments against the additional loss of sagebrush cover on the local landscape in the NEPA process.
- 10.3.** FM-3: Apply appropriate seasonal restrictions for implementing vegetation and fuels management treatments according to the type of seasonal habitats present. Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around and/or in the winter range and would protect, maintain, increase, or enhance winter range habitat quality. Ensure chemical applications are utilized where they would assist in success of fuels treatments. Strategically place treatments on a landscape scale to prevent fire from spreading into Priority Habitat Management Areas or WUI.
- 10.4.** FM-4: Develop a fuels continuity and management strategy to expand, enhance, maintain and protect GRSG habitat informed by the FIAT Assessments completed as described in Appendix D.
- 10.5.** FM-5: When developing the fuels management strategy as part of the FIAT Assessment described in Appendix D consider up-to-date fuels profiles; land use plan direction; current and potential habitat fragmentation; sagebrush and GRSG ecological factors; active vegetation management steps to provide critical breaks in fuel continuity where appropriate; incorporate a comparative risk analysis with regard to the risk of increased habitat fragmentation from a proposed action versus the risk of large scale fragmentation posed by wildfires if the action is not taken.
- 10.6.** FM-6: Fuel treatments will be designed through an interdisciplinary process to expand, enhance, maintain, and protect GRSG habitat which considers a full range of cost effective fuel reduction techniques, including: chemical, biological (including grazing and targeted grazing), mechanical and prescribed fire treatments.
- 10.7.** FM-7: Existing and proposed linear ROWs could be considered for use and maintenance as vegetated fuel breaks in appropriate areas (this activity may or may not be part of the ROW permit or the responsibility of the permit holder, in cases where this activity is considered part of mitigation for project design then it would be appropriately included as part of the ROW permit and the responsibility of the permit holder for development and maintenance).
- 10.8.** FM-8: Fuel breaks would incorporate existing vegetation treatments (seedings) or be located adjacent to existing linear disturbance areas where appropriate. Fuel breaks should be placed in areas with the greatest likelihood of compartmentalizing a fire and/or to foster suppression options to protect existing intact habitat.
- 10.9.** FM-9: Strategically pre-treat areas to reduce fine fuels consistent with areas and results identified within the Wildfire and Invasive Species Assessments..

- 10.10.** FM-10: Protect seeding efforts from subsequent fire events.
- 10.11.** FM-11: Targeted grazing as a fuels treatment to adjust the vegetation conditions to reduce the potential start and spread of unwanted wildfires may be implemented within existing grazing authorizations if feasible such as through temporary non-renewable authorizations, or through contracts, agreements or other appropriate means separate from existing grazing authorizations and permits.
- 10.12.** FM-12: Targeted grazing to achieve fuels management objectives should conform to the following criteria:
- Targeted grazing should be implemented strategically on the landscape, and directly involve the minimum footprint and grazing intensity required to meet fuels management objectives.
  - Allow conformance to the applicable Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho or Montana) at the assessment scale.
  - Where feasible and applicable coordinate with the grazing permittee to strategically reduce fuels through livestock management within the Mandatory Terms and Conditions of the applicable grazing authorizations
- 10.13.** FM-13: Prioritize the use of native seeds for fuels management treatment based on availability, adaptation (site potential), and probability of success. Where probability of success or native seed availability is low or non-economical, nonnative seeds may be used to meet GRSG habitat objectives to trend toward restoring the fire regime. When reseeding, use fire resistant native and nonnative species, as appropriate, to provide for fuel breaks.
- 10.14.** FM-14: Maintain effectiveness of fuels projects, including fuel breaks, to ensure long-term success, including persistence of seeded species and/or other treatment components while maintaining the integrity of adjacent vegetation.

**11. Wildfire Restoration/Rehabilitation – Emergency Stabilization and Rehabilitation**

- 11.1.** ESR-1: Utilize the findings and Restoration/Rehabilitation Strategy developed as part of the FIAT Assessment process described in Appendix D to determine if GRSG rehabilitation actions are needed, based on ecological potential, and direct emergency stabilization and rehabilitation (ESR) (BLM) or Burned Area Emergency Restoration (BAER) (FS) actions after fire.
- 11.2.** ESR-2: Incorporate GRSG Habitat Management Objectives into ESR/BAER plans based on site potential and in accordance with the Restoration/Rehabilitation Strategy developed as a result of the FIAT Assessments.
- 11.3.** ESR-3: Provide adequate rest from livestock grazing to allow natural recovery of existing vegetation and successful establishment of seeded species. New seedings should not be grazed until at least the end of the second growing season, and longer as needed to allow plants to mature and develop robust root systems which will stabilize the site, compete effectively against cheatgrass and other invasive annuals, and remain sustainable under long-term grazing management. Adjust other management activities, as appropriate, to meet ES&R objectives.
- 11.4.** ESR-4: Adjust, as appropriate, livestock management on adjacent unburned areas to mitigate the effect of the burn on local GRSG populations.

## 12. Habitat Restoration and Vegetation Management

- 12.1. VEG-1: Implement habitat rehabilitation or restoration projects in areas that have potential to improve GRSG habitat using a full array of treatment activities as appropriate, including chemical, mechanical and seeding treatments.
- 12.2. VEG-2: Implement vegetation rehabilitation or manipulation projects to enhance sagebrush cover or to promote diverse and healthy grass and forb understory to achieve the greatest improvement in GRSG habitat based on FIAT Assessments, HAF assessments, other vegetative assessment data and local, site specific factors that indicate sagebrush canopy cover or herbaceous conditions do not meet habitat management objectives (i.e. is minimal or exceeds optimal characteristics). This may necessitate the use of prescribed fire as a site preparation technique to remove annual grass residual growth prior to the use of herbicides in the restoration of certain lower elevation sites (e.g., Wyoming big sagebrush) but such efforts will be carefully planned and coordinated to minimize impacts to sage-grouse seasonal habitats.
- 12.3. VEG-3: Require use of native seeds for restoration based on availability, adaptation (ecological site potential), and probability of success (Richards et al. 1998). Non-native seeds may be used as long as they support GRSG habitat objectives (Pyke 2011) to increase probability of success, when adapted seed availability is low or to compete with invasive species especially on harsher sites.
- 12.4. VEG-4: Implement management changes in restoration and rehabilitation areas, as necessary, to maintain suitable GRSG habitat, improve unsuitable GRSG habitat and to ensure long-term persistence of improved GRSG habitat (Eiswerth and Shonkwiler 2006). Management changes could be considered during livestock grazing permit renewals, travel management planning, and renewal or reauthorization of rights-of-way.
- 12.5. VEG-5: Consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) to provide a reliable source of locally adapted seed to use during rehabilitation and restoration activities.
- 12.6. VEG-6: Allocate use of native seed to GRSG or ESA listed species habitat in years when preferred native seed is in short supply. This may require reallocation of native seed from ESR (BLM) and/or BAER (Forest Service) projects outside of Priority or Important Habitat Management Areas to those inside it. Where probability of success or native seed availability is low, nonnative seeds may be used as long as they meet GRSG habitat conservation objectives (Pyke 2011). Re-establishment of appropriate sagebrush species/subspecies and important understory plants, relative to site potential, shall be the highest priority for rehabilitation efforts.
- 12.7. VEG-7: During land health assessments evaluate the compatibility of existing nonnative seedings for GRSG habitat to keep as a component of a grazing system, development of a forage reserve, or to be used as a fuelbreak (Davies et al. 2011) or during restoration development. If nonnative seedings do not contribute to a grazing system, are not suitable for a forage reserve, and are not suitable fuelbreaks, evaluate the nonnative seedings in and adjacent to PHMA to determine if they should be diversified with or converted to native grasses, forbs, and shrubs, including sagebrush.
- 12.8. VEG-8: Utilize conifer (juniper) removal treatments to reduce the extent of conifer encroachment areas in sagebrush habitats. Prioritize treatments closest to occupied

sage-grouse habitats and near occupied leks, and where juniper encroachment is phase 1 or phase 2. Use of site-specific analysis and tools like VDTT and FIAT assessments to help refine the location for specific priority areas to be treated. Refrain from using prescribed fire and conducting removal projects in old-growth juniper stands. Old-growth juniper trees are characterized by rounded tops and spreading canopies, often containing dead limbs and/or spike tops, large branches near the base of the tree, as well as furrowed, fibrous bark, and are typically host to arboreal lichens. Leader growth in the upper quarter of the tree is usually less than one inch. These trees are generally distributed on rock outcrop or rubble land soils, or other soils with coarse fragments in the soil-surface and/or slopes over 12-25%, where juniper vegetation type is the climax plant community (IDFG 2000; Miller et al 2005; USDI and USGS 2007).

- 12.9.** VEG-9: Avoid using prescribed fire in Greater Sage-Grouse habitat unless evaluation of site-specific conditions demonstrate that there would be a net benefit for sage-grouse. If prescribed fire is used in Greater Sage-Grouse habitat, include an analysis in the NEPA document that indicates how Greater Sage-Grouse goals and objectives will be addressed and met by its use, why alternative techniques were not selected, and a risk assessment to address how potential threats to Greater Sage-Grouse habitat would be minimized.
- If prescribed fire is to be used at the implementation level, at a minimum, the burn plan will indicate how land use plan objectives would be addressed and met and why alternative techniques were not selected.
  - Avoid prescribed fire as a vegetation or fuels treatment in Wyoming big sagebrush or other xeric sagebrush species, or in areas with a potential for post-fire exotic annual dominance. However, after other treatment opportunities have been explored and as site-specific variables allow, prescribed fire could be used in these areas to meet specific fuels objectives that would maintain, improve, or restore Greater Sage-Grouse habitat (e.g., creation of fuel breaks that would disrupt the fuel continuity across the landscape in stands where annual invasive grasses are a minor component in the understory, burning slash piles from conifer reduction treatments, used as a component with other treatment methods to combat annual grasses and restore native plant communities).
  - Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around and/or in the winter range and would protect, maintain, increase, or enhance winter range habitat quality.

**13. Invasive Species**

- 13.1. Invasive Species (INV)-1: Incorporate results of the FIAT Assessments into projects and activities addressing invasive species.
- 13.2. INV-2: Implement noxious weed and invasive species control using integrated vegetation management actions per national guidance and local weed management plans for Cooperative Weed Management Areas in cooperation with State and Federal agencies, affected counties, and adjoining private lands owners.
- 13.3. INV-3: Conduct integrated weed management actions for noxious and invasive weed populations that are impacting or threatening GRSG habitat quality using a variety of eradication and control techniques including chemical, mechanical and other appropriate means.
- 13.4. INV-4: Require project proponent (projects described in Table X and which are included in the anthropogenic disturbance cap evaluation) to ensure that noxious weeds and invasive species caused as a result of the project are treated to eliminate establishment on the disturbed project construction areas for at least 3 years.

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**14. Lands and Realty / Infrastructure**

- 14.1. Lands and Realty (LR)-1: Priority: Designate and manage Priority Habitat Management Areas as ROW avoidance areas, consistent with AD-3 and subject to RDFs, buffers and seasonal timing restrictions (Appendix A, B & C). Important: Designate and manage Important Habitat Management Areas as ROW avoidance areas, consistent with AD-4 and subject to RDFs, buffers and seasonal timing restrictions. General: Designate and manage General Habitat Management Areas as open with proposals subject to RDFs, buffers and seasonal timing restrictions.
- 14.2. LR-2: Priority: Designate and manage Priority Habitat Management Areas as exclusion areas for utility scale (20 MW) Wind and Solar testing and development, nuclear and hydropower energy development. Important: Designate and manage Important Habitat Management Areas as avoidance areas for Wind and Solar testing and development, nuclear and hydropower development. General: Designate and manage General Habitat Management Areas as open for Wind and Solar testing and development and nuclear and hydropower development subject to RDFs, buffers and seasonal timing restrictions.
- 14.3. LR-3: Priority: Development of commercial service airports and facilities (as defined by FAA 2014 – publically owned airports that have at least 2,500 passenger boardings each calendar year and receive scheduled passenger service) would not be allowed within Priority Habitat Management Areas. Important and General Habitat Management Areas are Avoidance and Open respectively for these types of ROW applications as described in LR-1.
- 14.4. LR-4: Priority: Development of new or expansion of existing landfills would not be allowed within Priority Habitat Management Areas. Important and General Habitat Management Areas are Avoidance and Open respectively for these types of ROW applications as described in LR-1.
- 14.5. LR-5: Consistent with LR-2, LR-3 and LR-4, Rights-of-way for development of new or amended ROWs and land use authorizations in PHMA would only be considered when consistent with the Anthropogenic Disturbance Exception Criteria (AD-3); Rights-of-way for development of new or amended ROWs and land use authorizations in IHMA could be considered consistent with the Important Habitat Management Area Anthropogenic Disturbance Development Criteria. (AD-4). General: New ROW and land use authorizations could be considered.
- 14.6. LR-6: If the project is an incremental upgrade/capacity increase of existing development (i.e. powerline capacity upgrade) - the existing transmission line must be removed and area rehabilitated within a specified amount of time after the new line is installed and energized.
- 14.7. LR-7: Existing designated corridors, including Section 368 Corridors, will remain Open (subject to the ongoing settlement agreement).
- 14.8. LR-8: Process unauthorized use. If the use is subsequently authorized, it would be authorized consistent with direction for the Management Areas within which it is located and the RDFs, buffers and seasonal timing restrictions. If the use is not subsequently authorized the site would be reclaimed by removing these features and rehabilitating the habitat.
- 14.9. LR-9: Land use authorizations that are temporary (less than 3 years) in nature would be subject to seasonal or timing restrictions and mitigation requirements regarding habitat loss as needed.

- 14.10.** LR-10: New ROW applications for water facilities (ditches, canals, pipelines), or amendments to existing water facilities which include additional structures to improve fish passage or benefits to fisheries (new diversions, fish screens) would be allowed on a case-by-case bases subject to RDFs to reduce impacts to GRSG habitat and mitigation requirements regarding GRSG habitat loss as needed.
- 14.11.** LR-11: When a ROW grant expires and is not requested to be renewed, is relinquished, or terminated, the lease holder would be required to reclaim the site by removing overhead lines and other infrastructure and to eliminate avian predator nesting opportunities provided by anthropogenic development on public lands associated with the now void ROW grant (e.g., remove powerline and communication facilities no longer in service).
- 14.12.** LR-12: Work with existing ROW holders to retrofit existing towers and structures consistent with RDFs described in Appendix A.
- 14.12.1.** LR-13: Lands within Priority, Important or General Habitat Management Areas for Greater Sage-Grouse will be retained in federal management unless: (1) the agency can demonstrate that disposal of the lands will provide a net conservation benefit to the Greater Sage-Grouse or (2) the agency can demonstrate that the disposal of the lands will have no direct or indirect adverse impact on conservation of the Greater Sage-Grouse. Land tenure adjustments would be subject to the following disposal, exchange, and acquisition criteria, which include retaining lands with GRSG habitat. Retention of areas with GRSG would reduce the likelihood of habitat conversion to agriculture, urbanization, or other uses that would remove sagebrush habitat and potentially impact sensitive plants. Criteria:
- a. Lands within Priority, Important and General Habitat Management Areas would not be available for disposal through sale (Appendix J).
  - b. Acquire habitat within Priority and Important Habitat Management Areas, when possible (i.e. willing landowner), and retain ownership of habitat within all Areas, except if a land exchange would allow for additional or more contiguous federal ownership patterns.
  - c. Lands within Priority, Important and General Habitat Management Areas would be retained unless exchange of those lands would increase the extent or provide for connectivity of Priority or Important Habitat Management Areas.
  - d. Evaluate potential land exchanges containing historically low-quality GRSG habitat that may be too costly to restore in exchange for lands of higher quality habitat, lands that connect seasonal GRSG habitats or lands providing for threatened and endangered species. These potential exchanges should lead to an increase in the extent or continuity of or provide for improved connectivity of Priority Habitat Management Areas. Higher priority will be given to exchanges for those in-tact areas of sagebrush that will contribute to the expansion of sagebrush areas within Priority Habitat Management Areas currently in public ownership. Lower priority would be given to other lands that would promote enhancement in the Priority and Important Habitat Management Areas.
  - e. Identify lands for acquisition that increase the extent of or provide for connectivity of Priority Habitat Management Areas.

## 15. Minerals

### 15.1. Fluid Minerals

- 15.1.1.** Fluid Minerals (FLM)-1: Idaho: Areas within Priority Habitat Management Areas and Important Habitat Management Areas would be open to mineral leasing and development and geophysical exploration subject to no surface occupancy with a limited exception (FLM-3). General Habitat Management Areas would be open to mineral leasing and development and geophysical exploration subject to CSU which includes buffers, seasonal timing restrictions and standard stipulations. Montana: Areas within Priority Habitat Management Areas would be open to leasing subject to no surface occupancy. No waivers, exceptions or modifications would be allowed unless approved by the State Director. General Habitat Management Areas would be open to leasing subject to CSU which includes buffers, seasonal timing restrictions and standard stipulations.
- 15.1.2.** FLM-2: FLM-7: Parcels nominated for lease in Priority or Important Habitat Management Areas would be evaluated prior to lease offering to determine if development is feasible when buffers and seasonal timing restrictions are applied. Parcels which do not meet the criteria would not be offered for lease.
- 15.1.3.** FLM-3: Priority and Important Habitat Management Areas: A lease waiver, exception or modification to the NSO stipulation may be considered where a portion of the proposed lease is determined to be in non-greater sage-grouse habitat, the area is not used by Greater sage-grouse, or it would not have direct, indirect or cumulative effects to Greater sage-grouse or its habitat. The determination would be made by a team of interagency Greater sage-grouse experts, including an expert from the state wildlife agency, USFWS and the BLM. Waivers, by regulation, require a 30-day public review (43 CFR ????.??). All exceptions must be approved by the State Director. In the event a waiver, exception or modification were allowed development would still be subject to CSU which includes buffers, seasonal timing restrictions and standard stipulations.

#### **Waivers, Exceptions and Modifications (WEMs)** (Source IM-2008-032)

A waiver is a permanent exemption from a lease stipulation, the stipulation would no longer apply anywhere within the lease. Waivers require a 30-day public review and are approved and signed by the State Director.

An exception is a one-time exemption for a particular site within the lease; exceptions are determined on a case-by-case basis; the stipulation continues to apply to all other sites within the lease. An exception is a limited type of waiver.

A modification is a change to the provisions of a lease stipulation, either temporarily or for the term of the lease. Depending on the specific modification, the stipulation may or may not apply to all sites within the lease to which the restrictive criteria are applied.

- 15.1.4.** FLM-4: Incorporate required design features and best management practices appropriate to the management area as conditions of approval when post leasing activity is proposed into any post-lease authorizations.
- 15.1.5.** FLM-5: Complete a Master Development Plan on leases where a producing field is proposed to be developed.

- 15.1.6.** FLM-6: Encourage unitization when deemed necessary for proper development and operation of an area (with strong oversight and monitoring). The unitization must be designed in a manner to minimize adverse impacts on GRSG according to the Federal Lease Form, 3100-11, Sections 4 and 6.
- 15.1.7.** FLM-7: Issue Written Orders of the Authorized Officer (43 CFR 3161.2) requiring reasonable protective measures consistent with the lease terms where necessary to avoid or minimize effects to GRSG populations or habitat.
- 15.2. Locatable Minerals**
- 15.2.1.** Locatable Minerals (LOC)-1: Lands would remain open to locatable mineral entry in all management areas.
- 15.2.2.** LOC-2: Apply reasonable and appropriate required design features and best management practices as Conditions of Approval to prevent unnecessary or undue degradation of GRSG habitat when a Plan of Operations is submitted for BLM or FS approval, in accordance with 43 CFR 3809.411(d)(2) (or 36 CFR 228.5(a)(3) on National Forest System lands).
- 15.3. Salable Minerals**
- 15.3.1.** Salable Minerals (SAL)-1: Priority: No new site authorizations would be approved. Important: New site authorizations could be considered provided the Anthropogenic Disturbance Development Criteria (AD-4) can be met, and subject to RDFs, buffers and seasonal timing restrictions. Sales from existing community pits within PHMA and IHMA would be subject to seasonal timing restrictions. General: Open to new site authorizations subject to RDFs, buffers and seasonal timing restrictions. Existing sites Open to new sales subject to seasonal timing restrictions.
- 15.3.2.** SAL-2: Restore salable mineral pits no longer in use to meet GRSG habitat management objectives.
- 15.3.3.** SAL-3: Require reclamation bonding that would require restoration of GRSG habitat on new site authorizations for mineral material pits in IHMA (this would not apply to free use permits issued to a government entity such as a county road district, but would apply to non-profit entities).
- 15.4. Non-Energy Solid Mineral Leasable Minerals**
- 15.4.1.** Non Energy Leasables (NEL)-1: Priority, Important and General Habitat Management Areas: Areas within Know Phosphate Leasing Areas (KPLAs) will remain open to leasing subject to standard stipulations. PHMA areas outside KPLAs are closed to leasing and prospecting. IHMA areas outside of KPLAs are open to prospecting and subsequent leasing provided the Anthropogenic Disturbance Development Criteria (AD-4) and the anthropogenic disturbance cap (AD-1) can be met. RDFs, buffers and seasonal timing restrictions shall be applied to prospecting permits. Exceptions to closures in PHMA and IHMA may be made for lease modifications and fringe leases where valid existing rights may be affected. General Habitat Management Areas: Lands outside KPLAs are available for prospecting and subsequent leasing and initial mine development subject to RDFs, buffers, timing restrictions (seasonal and daily) and standard stipulations.
- 15.4.2.** NEL-2: Require seasonal and daily timing restrictions in undeveloped non-energy mineral leases when exploration activities or initial mine development is proposed (e.g. exploration drilling, timber removal, shrub clearing, etc.) as conditions of approval.
- 15.4.3.** NEL-3: Include RDFs as conditions of approval to mine plans in undeveloped non-energy mineral leases for exploration activities or initial mine development.

**15.5. Mineral Split Estate**

**15.5.1. Mineral Split Estate (MSE)-1: BLM Owns Mineral Estate – non-federal surface owner:** In coordination with surface owner, apply stipulations, conservation measures, and design features consistent with those applied to BLM- and Forest Service-administered lands in the management area.

**15.5.2. MSE-2: BLM owns surface – non-federal mineral estate owner:** Recommend to the state regulatory entity and mineral estate owner that timing restrictions, COAs, and buffer restriction be applied around occupied leks, when concurring to the approval of authorizations for mineral-related surface disturbance on lands with GRSG habitat.

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## **16. Range Management/Livestock Grazing**

- 16.1.** Range Management (RM)-1: Maintain existing areas designated as available or unavailable for livestock grazing. Existing active AUMs for livestock grazing within the planning area would not be changed at the broad scale, though the number of AUMs available on an allotment may be adjusted based on site-specific conditions to meet management objectives during term permit renewals, AMP development, or other appropriate implementation planning. Additionally, temporary adjustments can be made annually to livestock numbers, the number of AUMs, and season of use in accordance with applicable regulations.
- 16.2.** RM-2: Prioritize BLM land health assessments and processing of BLM grazing permits consistent with management area prioritization (MA-4), unless other higher priority considerations exist such as threatened, endangered and proposed species habitat that livestock grazing could affect. Where possible, conduct land health assessments at the watershed, or other meaningful landscape-scale.
- 16.3.** RM-3: Where opportunities exist, coordinate with other land managers to encourage livestock operations that utilize mixed federal, private and/or state land to be managed at the landscape scale to benefit GRSG and their habitat across land ownerships.
- 16.4.** RM-4: PHMA & IHMA: During the land health assessment process, identify the type(s) of seasonal habitat the assessed areas are capable of supporting. Utilize the habitat assessment framework, (Stiver et al. 2014 as amended/replaced) or other BLM or Forest Service approved methodology, in accordance with current policy and guidance to determine whether vegetation structure, condition and composition are meeting GRSG habitat objectives including riparian and lentic areas (HM-OBJ-2; Table 2). Use appropriate Ecological Site Descriptions, reference sheets and state and transition models to inform desired habitat conditions and expected responses to management changes for the land unit being assessed.
- 16.5.** RM-5: When modifying grazing management, analyze indirect effects to habitat, including changes in fuel loading and wildfire behavior.
- 16.6.** RM-6: When livestock management practices are determined to not be compatible with meeting or making progress towards achievable habitat objectives following consultation, cooperating and coordination with permittees and interested publics, implement changes in grazing management through grazing authorization modifications, or allotment management plan implementation. Potential modifications include, but are not limited to, changes in:
- 1) Season or timing of use;
  - 2) Numbers of livestock;
  - 3) Distribution of livestock use;
  - 4) Duration and/or level of use;
  - 5) Kind of livestock (e.g., cattle, sheep, horses, or goats) (Briske et al. 2011);
  - 6) Voluntary measures such as temporary non-use; and
  - 7) Grazing schedules (including rest or deferment).
- 16.7.** RM-7: Where opportunities exist, establish forage reserves to facilitate restoration and rehabilitation efforts in sage-grouse habitat areas.
- 16.8.** RM-8: PHMA & IHMA - When an allotment becomes vacant or grazing preference is relinquished, consider voluntary retirement of the allotment or grazing preference in whole or in part, or converting the area to a forage reserve/buffer when doing so

would maintain or enhance sage-grouse habitat. GHMA - When an allotment becomes vacant or grazing preference is relinquished, consider converting it to a forage reserve/buffer to use during fire rehabilitation or restoration efforts elsewhere, when such actions would result in a net benefit to GRSG habitat and other priority resources.

- 16.9.** RM-9: PHMA & IHMA - Where practical, design pasture rotations to utilize non-native perennial grass seedings and/or annual grasslands, during GRSG nesting season annually or periodically.
- 16.10.** RM-10: Evaluate the locations where salt/supplements are placed. In coordination with the permittee, have salt/supplements placed in areas which would reduce impacts to GRSG habitat (e.g., existing disturbed areas).
- 16.11.** RM-11: Incorporate RDFs into Terms and Conditions for crossing permits to limit disturbance of occupied leks when trailing livestock across BLM- and Forest Service-administered lands in the spring. Work with permittees in locating over-nighting, watering and bedding locations to minimize impacts to seasonal habitats.
- 16.12.** RM-12: Design any new structural range improvements, following cooperation, consultation and coordination with permittees, to minimize and/or mitigate effects to GRSG habitat. Any new structural range improvements are subject to RDFs (Appendix A). Structural range improvement in this context, include, but are not limited to: fences, exclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments.
- 16.13.** RM-13: During the land health assessment and grazing permit renewal process, evaluate existing livestock management range improvements with respect to their effect on GRSG habitat. Consider removal of projects that are not needed for effective livestock management, are no longer in working condition, and/or negatively affect GRSG habitat, with the exception of functional projects needed for management of habitat for other threatened, endangered or proposed species or other sensitive resources.
- 16.14.** RM-14: Prioritize removal, modification or marking of fences or other structures in areas of high collision risk following cooperation, consultation and coordination with permittees to reduce the incidence of GRSG mortality due to fence strikes (Stevens et al. 2012).

**17. Wild Horses and Burros**

- 17.1. Wild Horse and Burro (WHB)-1: Develop or amend BLM Herd Management Area Plans to incorporate GRSG habitat objectives and management considerations for all BLM HMAs) and Forest Service Wild Horse Territories.
- 17.2. WHB-2: When evaluating AML on HMAs within PHMA and IHMA, evaluate indicators that address structure/condition/composition of vegetation and measurements specific to achieving GRSG habitat objectives.
- 17.3. WHB-3: Utilize interdisciplinary land health assessments in HMAs containing GRSG habitat to determine whether vegetation characteristics are meeting appropriate seasonal habitat objectives.
- 17.4. WHB-4: PHMA: Do not expand HMAs. IHMA: Analysis of proposed additions to existing HMA boundaries should consider the direct, indirect and cumulative impacts on GRSG habitat, including the need for additional infrastructure such as boundary fencing, and consider alternative areas outside of PHMA and IHMA.
- 17.5. WHB-5: Prioritize gathers and population growth suppression techniques in HMAs within Priority and Important Habitat Management Areas, unless removals are necessary in other areas to address higher priority environmental issues, including herd health impacts. Additional prioritization would be given for HMAs that are near AML or where a reduction would serve the most beneficial purpose.



## 18. Travel Management

- 18.1. Travel Management (TM) -1: Limit off-highway vehicle motorized travel within Idaho BLM Field Offices to existing roads, primitive roads, and trails in areas where travel management planning has not been completed or is in progress. This excludes areas previously designated as open through a land use plan decision or currently under review for designation as open, currently being analyzed in ongoing RMP revision efforts in the Four Rivers, Jarbidge and Upper Snake Field Offices. Upon completion of travel management plans the designation would change to limited to designated roads, primitive roads and trails.

An off-highway vehicle is any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) Any nonamphibious registered motorboat; (2) any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) Vehicles in official use where official use is use by an employee, agent, or designated representative of the Federal Government or one of its contractors, in the course of his employment, agency, or representation.; and (5) any combat or combat support vehicle when used in times of national defense emergencies (43 CFR 8340.0 5).

- 18.2. TM-2: Temporary closures will be considered in accordance with 43 CFR subpart 8364 (Closures and Restrictions); 43 CFR subpart 8351 (Designated National Area); 43 CFR subpart 6302 (Use of Wilderness Areas, Prohibited Acts, and Penalties); 43 CFR subpart 8341 (Conditions of Use).

Temporary closure or restriction orders under these authorities are enacted at the discretion of the authorized officer to resolve management conflicts and protect persons, property, and public lands and resources. Where an authorized officer determines that off-highway vehicles are causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources, the affected areas shall be immediately closed to the type(s) of vehicle causing the adverse effect until the adverse effects are eliminated and measures implemented to prevent recurrence. (43 CFR 8341.2) A closure or restriction order should be considered only after other management strategies and alternatives have been explored. The duration of temporary closure or restriction orders should be limited to 24 months or less; however, certain situations may require longer closures and/or iterative temporary closures. This may include closure of routes or areas.

- 18.3. TM-3: Develop Travel Management Plans for each Field Office as described in the BLM Travel Management Handbook 8342.1 and according to the travel management planning guidelines (Appendix K).

- 18.4. TM-4: During subsequent travel management planning design and designate a travel system to minimize adverse effects on GRSG. Locate areas and trails to minimize harassment of wildlife or significant disruption of wildlife habitats. Give special attention to protect endangered or threatened species and their habitats. Allow for route upgrade, closure of existing routes, and creation of new routes to help protect habitat and meet user group needs, thereby reducing the potential for pioneering

unauthorized routes. The emphasis of the comprehensive travel and transportation planning within Priority Habitat Management Areas would be placed on having a neutral or positive effect on GRSG habitat. Individual route designations would occur during subsequent travel management planning efforts.

- 18.5.** TM-5: Conduct road maintenance activities to avoid disturbance during specific times at different seasons – see seasonal and timing restrictions section.

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**19. Recreation**

- 19.1. REC-1: Manage existing recreation uses and sites to minimize adverse effects on GRSG or their habitat through incorporation of RDFs, buffers and seasonal restrictions.
- 19.2. REC-2: Do not construct new recreation facilities (e.g., campgrounds, trails, trailheads, staging areas) within PHMAs and IHMAs unless the development would have a neutral effect or be beneficial to GRSG habitat (such as concentrating recreation, diverting use away from critical areas, etc.); or the new construction replaces existing facilities and reduces impacts from the existing facilities as in TM-4, or unless the development is required for visitor safety or resource protection.

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**20. Monitoring**

- 20.1.** Monitoring (MON)-1: Annually complete a review of FIAT Assessment implementation efforts within GRSG habitat with appropriate USFWS and state agency personnel.
- 20.2.** MON-2: Annually monitor the effectiveness of fuels treatment projects.
- 20.3.** MON-3: Monitor invasive vegetation post vegetation management treatment
- 20.4.** MON-4: Monitor project construction areas for noxious weed and invasive species for at least 3 years, unless control is achieved earlier.
- 20.5.** MON-5: Use lek, nesting and winter habitat maps and key habitat map (updates) to annually assess GRSG population and habitat status in the context of the adaptive management triggers.
- 20.6.** MON-6: Continue to support updates to the Key Habitat map to track vegetation changes in relation to GRSG habitat on a yearly basis, until such a time this process is replaced. The process used to update the Key Habitat Map is described in Appendix F.
- 20.7.** MON-7: Monitor GRSG habitat as described in the monitoring framework plan (Appendix E) in coordination with IDFG and MT FWP.

## **Appendices**

**Appendix A – Required Design Features**

**Appendix B – Seasonal Timing Restrictions**

**Appendix C – Application of Buffers**

**Appendix D – Wildfire and Invasive Species Assessments/FIAT Team**

**Appendix E – Monitoring Framework Plan**

**Appendix F – Idaho Key Habitat Map Update Process**

**Appendix G – Idaho Anthropogenic Disturbance and Adaptive Management**

**Appendix H – Montana Anthropogenic Disturbance Process**

**Appendix I – Mitigation**

**Appendix J – Lands No Longer Available for Disposal**

**Appendix K – Travel Management Planning Guidelines**

**Appendix L – Functioning of Boards**

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## Appendix A – Required Design Features

The following required design features (RDFs) are included for consideration and use based upon review of current science and effects analysis (circa 2014) (Table A-1). These may be reviewed during project evaluation and updated through plan maintenance as new information and updated scientific findings become available.

The table is organized by program area grouping the RDFs most relevant to that program. All relevant RDFs, regardless of which program they are grouped under, should be considered during project evaluation and applicable RDFs should be applied during implementation, with the exception that they would be implemented as best management practices for locatable minerals activities, to the extent allowable by law. The table identifies the specific measure (numbered) and its appropriate application – as an RDF – required all the time everywhere; or as an RDF required when the applicable resources are present. In some cases the RDFs may not all be appropriate based on local conditions and would be assessed in the appropriate site specific NEPA analysis, these all should be considered and where determined to be beneficial to achieving GRSG habitat objectives included as part of the site specific project. In other cases additional project design criteria or best management practices could be incorporated into project implementation to address site specific concerns not fully addressed by the RDFs described here.

**Table A-1. Required Design Features**

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
<b>General</b>		
1. Solicit and consider expertise and ideas from local landowners, working groups, and other federal, state, county, and private organizations during development of projects.		X
<b>Wildfire Suppression</b>		
2. Compile district-level information into state-wide sage-grouse tool boxes. Tool boxes will contain maps, listing of resource advisors, contact information, local guidance, and other relevant information for each district, which will be aggregated into a state-wide document.	X	
3. Provide localized maps to dispatch offices and extended attack incident commanders for use in prioritizing wildfire suppression resources and designing suppression tactics. The Fire Planning and Fuels Management Division (FA-600) hosts a webpage containing up-to-date maps, instruction memoranda, conservation measures, BMPs, and spatial data specific to fire operations and fuels management/sage-grouse interactions. These resources can be accessed at: <a href="http://web.blm.gov/internal/fire/fpfm/sg/index.html">http://web.blm.gov/internal/fire/fpfm/sg/index.html</a> . Additional BLM sage-grouse information can be found at: <a href="http://www.blm.gov/wo/st/en/prog/more/fish_wildlife_and/sage-grouse-conservation.html">http://www.blm.gov/wo/st/en/prog/more/fish_wildlife_and/sage-grouse-conservation.html</a> .	X	
4. Assign a resource advisor with sage-grouse expertise, or who has access to sage-grouse expertise, to all extended attack fires in or near sage-grouse habitat areas. Prior to the fire season, provide	X	

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
training to sage-grouse resource advisors on wildfire suppression organization, objectives, tactics, and procedures to develop a cadre of qualified individuals. Involve state wildlife agency expertise in fire operations through: <ul style="list-style-type: none"> <li>• instructing resource advisors during preseason trainings;</li> <li>• qualification as resource advisors;</li> <li>• coordination with resource advisors during fire incidents;</li> <li>• contributing to incident planning with information such as habitat features or other key data useful in fire decision making</li> </ul>		
5. At the onset of an emerging wildland fire the Agency Administrators and Fire Management Officers will engage a local Resource Advisor to assess sage-grouse habitat that may be affected by the fire or suppression activities.	X	
6. If complexity of the wildland fire warrants the activation of an Incident Management Team, locally refined information regarding important sage-grouse habitat will be relayed during in brief and continually throughout the incident.		X
7. On critical fire weather days, pre-position additional fire suppression resources to optimize a quick and efficient response in sage-grouse habitat areas.		X
8. As appropriate, utilize existing fuel breaks, such as roads or discrete changes in fuel type, as control lines in order to minimize fire spread.		X
9. During periods of multiple fires, ensure line officers are involved in setting priorities.	X	
10. To the extent possible, locate wildfire suppression facilities (i.e., base camps, spike camps, drop points, staging areas, heli-bases, etc.) in areas where physical disturbance to sage-grouse habitat can be minimized. These include disturbed areas, grasslands, near roads/trails or in other areas where there is existing disturbance or minimal sagebrush cover.	X	
11. Power-wash all firefighting vehicles, to the extent possible, including engines, water tenders, personnel vehicles, and all-terrain vehicles (ATV) prior to deploying in or near sage-grouse habitat areas to minimize noxious weed spread.	X	
12. Minimize cross-country vehicle travel during fire operations in sage-grouse habitat.	X	
13. Minimize burnout operations in key sage-grouse habitat areas by constructing direct fireline whenever safe and practical to do so.	X	
14. Utilize retardant, mechanized equipment, and other available resources to minimize burned acreage during initial attack.	X	
15. As safety allows, conduct mop-up where the black adjoins unburned islands, dog legs, or other habitat features to minimize sagebrush loss.		X
16. Adequately document fire operation activities in sage-grouse habitat for potential follow-up coordination activities.	X	
<b>Fuels Management</b> Unless otherwise specified as part of the land use plan consider the full array of fuels management		

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
treatment types (prescribed fire, mechanical, chemical and biological) when implementing the following RDFs.		
17. Where applicable, design fuels treatment objectives to protect existing sagebrush ecosystems, modify fire behavior, restore native plants, and create landscape patterns which most benefit sage-grouse habitat.	X	
18. Provide training to fuels treatment personnel on sage-grouse biology, habitat requirements, and identification of areas utilized locally.	X	
19. Use burning prescriptions which minimize undesirable effects on vegetation or soils (e.g., minimize mortality of desirable perennial plant species and reduce risk of annual grass invasion).	X	
20. Ensure proposed sagebrush treatments are planned with full interdisciplinary input pursuant to NEPA and coordination with state fish and wildlife agencies, and that treatment acreage is conservative in the context of surrounding sage-grouse seasonal habitats and landscape.	X	
21. Where appropriate, ensure that treatments are configured in a manner that promotes use by sage-grouse.	X	
22. Where applicable, incorporate roads and natural fuel breaks into fuel break design.		X
23. Power-wash all vehicles and equipment involved in fuels management activities, prior to entering the area, to minimize the introduction of undesirable and/or invasive plant species.	X	
24. Design vegetation treatments in areas of high fire frequency which facilitate firefighter safety, reduce the potential acres burned, and reduce the fire risk to sage-grouse habitat. Additionally, develop maps for sage-grouse habitat which spatially display existing fuels treatments that can be used to assist suppression activities.	X	
25. Give priority for implementing specific sage-grouse habitat restoration projects in annual grasslands, first to sites which are adjacent to or surrounded by Priority Habitat Management Areas or that reestablish continuity between Priority Habitat Management Areas. Annual grasslands are a second priority for restoration when the sites are not adjacent to Priority Habitat Management Areas, but within Important Habitat Management Areas. The third priority for annual grassland habitat restoration projects are sites within General Habitat Management Areas. The intent is to focus restoration outward from existing, intact habitat.	X	
26. As funding and logistics permit, restore annual grasslands to a species composition characterized by perennial grasses, forbs, and shrubs or one of that referenced in land use planning documentation.	X	
27. Emphasize the use of native plant species, especially those from a warmer area of the species' current range, recognizing that non-native species may be necessary depending on the availability of native seed and prevailing site conditions.	X	
28. Remove standing and encroaching trees within at least 110 yards of occupied sage-grouse leks and other habitats (e.g., nesting,		X



Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
wintering and brood rearing) to reduce the availability of perch sites for avian predators, as resources permit.		
29. Protect wildland areas from wildfire originating on private lands, infrastructure corridors, and recreational areas.		X
30. Reduce the risk of vehicle- or human-caused wildfires and the spread of invasive species by installing fuel breaks and/or planting perennial vegetation (e.g., green-strips) paralleling road rights-of-way.		X
31. Strategically place and maintain pre-treated strips/areas (e.g., mowing, herbicide application, etc.) to aid in controlling wildfire, should wildfire occur near PHMA or priority restoration areas (such as where investments in restoration have already been made).	X	
32. Design treatments to provide a break in fuel continuity in large, at-risk, expanses of continuous sagebrush. Use local knowledge of fire occurrence, spread patterns, and habitat values at risk to determine the proper placement and size of the fuel break.	X	
33. Use existing agreements with local, county, and state road departments to improve and maintain existing fuel breaks during routine road maintenance. Examples include: blading, mowing, disking, grading, and spraying roadside vegetation.		X
34. Form partnerships with linear right-of-way holders to maintain fuel breaks, which reduce fuel continuity and serve to protect at-risk landscapes.		X
35. Use existing NEPA documentation and authorities, where possible, when conducting road right-of-way maintenance. In many instances, existing authorizations for roads or linear rights-of-way contain provisions for maintenance activities that could be implemented and incorporated into a vegetation and habitat protection strategy without requiring additional NEPA analysis. Document this with a Determination of NEPA Adequacy (DNA).		X
36. Enter into agreements with road departments which may help fund the construction and maintenance of fuel breaks adjacent to roads, as funding permits.		X
37. Spatially depict the locations of existing and planned fuel breaks in a landscape fuel break map and label each vegetation polygon for reference. Offices will make these maps available to suppression resources for use in fire operations.	X	
<b>Vegetation Treatment</b>		
38. Utilize available plant species based on their adaptation to the site when developing seed mixes. (Lambert 2005; VegSpec).	X	
39. Utilizing the warmer component of a species' current range when selecting native species for restoration when available (Kramer and Havens 2009).		X
40. Reduce annual grass densities and competition through herbicide, targeted grazing, tillage, prescribed fire, etc. (Pyke 2011).		X
41. Reduce density and competition of introduced perennial grasses using appropriate techniques to accomplish this reduction (Pellant and Lysne 2005).		X

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
42. Utilize techniques to introduce desired species to the site such as drill seeding, broadcast seeding followed by a seed coverage technique, such as harrowing, chaining or livestock trampling, and transplanting container or bare-root seedlings.		X
43. Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.		X
44. Use site preparation techniques that retain existing desirable vegetation.	X	
45. Use "mother plant" techniques or planting of satellite populations of desirable plants to serve as seed sources.		X
46. Utilize post-treatment control of annual grass and other invasive species.	X	
47. Utilize new tools and use of new science and research as it becomes available.	X	
<p>48. Give higher priority to vegetation rehabilitation or manipulation projects that include:</p> <ul style="list-style-type: none"> <li>• Sites where environmental variables contribute to improved chances for project success (Meinke et al. 2009).</li> <li>• Areas where seasonal habitat is limiting GRSG distribution and/or abundance (wintering areas, wet meadows and riparian areas, nesting areas, leks, etc.).</li> <li>• Re-establish sagebrush cover in otherwise suitable GRSG with consideration to local needs and conditions using the general priorities in the following order: <ul style="list-style-type: none"> <li>• Recently burned native areas</li> <li>• Native grassland with suitable forb component</li> <li>• Nonnative grassland with suitable forb component</li> <li>• Recently converted annual grass areas</li> <li>• Native grassland</li> <li>• Nonnative grassland</li> </ul> </li> <li>• Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial or other techniques to re-establish them. Examples include but are not limited to, use of a Lawson aerator with seeding, harrow or chain with seeding, drill seeding, hand planting plugs, aerial seeding or other appropriate technique.</li> <li>• Cooperative efforts that may improve GRSG habitat quality over multiple ownerships.</li> <li>• Projects that may provide connectivity between suitable habitats or expand existing good quality habitats.</li> <li>• Projects that address conifer encroachment into important GRSG habitats. In general the priority for treatment is 1) Phase 1 (<math>\leq 10\%</math> conifer cover), 2) Phase 2 (10-30%), and 3) Phase 3 (<math>&gt; 30\%</math>).</li> </ul>	X	

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
<ul style="list-style-type: none"> <li>Replacing stands of annual grasses within otherwise good quality habitats with desirable perennial species. Other factors that contribute to the importance of the restoration project in maintaining or improving GRSG habitat.</li> </ul>		
49. When conduction vegetation treatments in areas inhabited or potentially inhabited by slickspot peppergrass ( <i>Lepidium papilliferum</i> ) follow the conservation measures in the applicable conservation agreement (revised August 2014).		X
<b>Lands and Realty</b>		
50. Where technically and financially feasible, bury distribution powerlines and communication lines within existing disturbance.		X
51. Above-ground disturbance areas would be seeded with perennial vegetation as per vegetation management.	X	
52. Place infrastructure in already disturbed locations where the habitat has not been fully restored.		X
53. Cluster disturbances, operations (fracturing stimulation, liquids gathering, etc.) and facilities as close as possible.		X
54. Co-locate linear facilities within one mile of existing linear facilities.		X
55. Micro-site linear facilities to reduce impacts to sage-grouse habitats.	X	
56. Locate staging areas outside the Priority Habitat Management Areas to the extent possible.	X	
57. Consider collocating powerlines, flowlines and pipelines under or immediately adjacent to a road or adjacent to other pipelines first, before considering co-locating with other ROW.		X
58. Restrict the construction of tall facilities and fences to the minimum number and amount needed.	X	
59. Use free standing structures where possible, to limit the use of guy wires. Where guy wires are necessary and appropriate bird collision diverters would be used, if doing so would not cause a human safety risk.	X	
60. Place new utility developments (power lines, pipelines, etc.) and transportation routes in existing utility or transportation corridors.		X
61. Construction and development activities should conform to seasonal restrictions.	X	
<b>Fluid Mineral Leasing</b>		
62. Use directional drilling and/or multi well-pads to reduce surface disturbance.	X	
63. Apply a phased development approach with concurrent reclamation.	X	
64. Place liquid gathering facilities outside of PHMAs. Have no tanks at well locations within PHMAs to minimize truck traffic and perching and nesting sites for ravens and raptors.	X	
65. Use remote monitoring techniques for production facilities and develop a plan to reduce the frequency of vehicle use (Lyon and Anderson 2003).		X
66. Site and/or minimize linear ROWs or SUAs to reduce disturbance to sagebrush habitats.	X	

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
67. Design or site permanent structures which create movement (e.g. pump jack) to minimize impacts to GRSG.	X	
68. Equip tanks and other above-ground facilities with structures or devices that discourage nesting of raptors and corvids.		X
69. Control the spread and effects of non-native plant species (Gelbard and Belnap 2003, Bergquist et al. 2007, Evangelista et al. 2011). (E.g. by washing vehicles and equipment.)		X
70. Restrict pit and impoundment construction to reduce or eliminate threats from West Nile virus (Doherty 2007).		X
<p>71. Remove or re-inject produced water to reduce habitat for mosquitoes that vector West Nile virus. If surface disposal of produced water continues, use the following steps for reservoir design to limit favorable mosquito habitat:</p> <ul style="list-style-type: none"> <li>• Overbuild size of ponds for muddy and non-vegetated shorelines.</li> <li>• Build steep shorelines to decrease vegetation and increase wave actions.</li> <li>• Avoid flooding terrestrial vegetation in flat terrain or low lying areas.</li> <li>• Construct dams or impoundments that restrict down slope seepage or overflow.</li> <li>• Line the channel where discharge water flows into the pond with crushed rock.</li> <li>• Construct spillway with steep sides and line it with crushed rock.</li> <li>• Treat waters with larvicides to reduce mosquito production where water occurs on the surface</li> </ul>		X
72. In PHMA, limit noise from discretionary activities to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season.	X	
73. Require noise shields when drilling during the lek, nesting, brood-rearing, or wintering season.		X
74. The BLM/Forest Service would work with proponents to limit project related noise where it would be expected to reduce functionality of habitats in Priority and Important Habitat Management Areas.	X	
75. The BLM/Forest Service would evaluate the potential for limitation of new noise sources on a case-by-case basis as appropriate.	X	
76. Limit noise sources that would be expected to negatively impact populations in Priority and Important Habitat Management Areas and continue to support the establishment of ambient baseline noise levels for occupied leks in Priority Habitat Management Areas.	X	
77. As additional research and information emerges, specific new limitations appropriate to the type of projects being considered would be evaluated and appropriate limitations would be	X	

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
implemented where necessary to minimize potential for noise impacts on sage-grouse core population behavioral cycles.		
78. As new research is completed, new specific limitations would be coordinated with the IDFG and MT FWP and partners.	X	
79. Fit transmission towers with anti-perch devices (Lammers and Collopy 2007).		X
80. Require sage-grouse-safe fences.		X
81. Locate new compressor stations outside Priority Habitat Management Areas and design them to reduce noise that may be directed towards Priority Habitat Management Areas.	X	
82. Clean up refuse (Bui et al. 2011).	X	
83. Locate man camps outside of priority sage-grouse habitats.	X	
84. Consider using oak (or other material) mats for drilling activities to reduce vegetation disturbance and for roads between closely spaced wells to reduce soil compaction and maintain soil structure to increase likelihood of vegetation reestablishment following drilling.		X
85. Use only closed-loop systems for drilling operations and no reserve pits.	X	
86. Cover (e.g., fine mesh netting or use other effective techniques) all drilling and production pits and tanks regardless of size to reduce sage-grouse mortality.	X	
<b>Roads</b>		
87. Utilize existing roads, or realignments of existing routes to the extent possible.	X	
88. Design roads to an appropriate standard no higher than necessary to accommodate their intended purpose.	X	
89. Do not issue ROWs or SUAs to counties on newly constructed energy or mineral development roads, unless for a temporary use consistent with all other terms and conditions included in this document.	X	
90. Establish speed limits on BLM and FS system roads to reduce vehicle/wildlife collisions or design roads to be driven at slower speeds.		X
91. Coordinate road construction and use among ROW or SUA holders.	X	
92. Construct road crossings at right angles to ephemeral drainages and stream crossings.		X
93. Use dust abatement on roads and pads.	X	
94. Close and reclaim duplicate roads by restoring original landform and establishing desired vegetation.		X
<b>Roads Specific to Priority and Important Habitat Management Areas</b>		
95. Locate roads to avoid priority areas and habitats as described in the Wildfire and Invasive Species Assessments.	X	
96. Establish trip restrictions (Lyon and Anderson 2003) or minimization through use of telemetry and remote well control (e.g., Supervisory Control and Data Acquisition).	X	
97. Restrict vehicle traffic to only authorized users on newly constructed routes (using signage, gates, etc.)	X	

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
<b>Reclamation Activities</b>		
98. Include objectives for ensuring habitat restoration to meet sage-grouse habitat needs in reclamation practices/sites (Pyke 2011).	X	
99. Address post reclamation management in reclamation plan such that goals and objectives are to protect and improve sage-grouse habitat needs.		X
100. Maximize the area of interim reclamation on long-term access roads and well pads, including reshaping, topsoiling and revegetating cut-and-fill slopes.	X	
101. Restore disturbed areas at final reclamation to the pre-disturbance landforms and desired plant community.	X	
102. Irrigate interim reclamation if necessary for establishing seedlings more quickly.		X
103. Utilize mulching techniques to expedite reclamation and to protect soils.		X
<b>Grazing Required Design Features</b>		
104. Avoid building new wire fences within 2 km of occupied leks (Stevens 2011). If this is not feasible, ensure that high risk segments are marked with collision diverter devices or as latest science indicates.	X	
105. Place new, taller structures, including corrals, loading facilities, water storage tanks, windmills, out of line of sight or at least one kilometer (preferably 3 km) from occupied leks, where such structures would increase the risk of avian predation.	X	
106. Utilize temporary fencing (e.g., ESR, drop down fencing) where feasible and appropriate to meet management objectives.		X
107. Fence wetlands (e.g., springs, seeps, wet meadows and/or riparian areas) where appropriate, to maintain or foster progress toward Proper Functioning Condition and to facilitate management of sage-grouse habitat objectives. Where constructing fences or exclosures to improve riparian and/or upland management, incorporate fence marking or other BMPs/RDFs as appropriate.		X
108. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), livestock trailing will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6:00 p.m. and 9:00 a.m. to avoid disturbance to lekking and roosting sage-grouse. Over-nighting, watering and sheep bedding locations on public lands must be at least 1 km from occupied leks during the lekking season to reduce disturbance from sheep, human activity and guard animals.	X	
109. Work with permittees in locating sheep over-nighting, watering and sheep bedding locations to minimize impacts to sage-grouse seasonal habitats.	X	
110. When trailing livestock during the lekking or nesting season, use roads or existing trails, to the extent possible to reduce disturbance to roosting, lekking or nesting sage-grouse.		X
111. Design new spring developments in GRSG habitat to maintain or enhance the free flowing characteristics of springs and wet		X

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
meadows. Modify developed springs, seeps and associated pipelines to maintain the continuity of the predevelopment riparian area within priority GRS habitat where necessary.		
112. Install ramps in new and existing livestock troughs and open water storage tanks to facilitate the use of and escape from troughs by GRS and other wildlife.		X
<b>West Nile Virus Required Design Features</b>		
113. Construct water return features and maintain functioning float valves to prohibit water from being spilled on the ground surrounding the trough and/or tank and return water to the original water source, to the extent practicable.	X	
114. Minimize the construction of new ponds or reservoirs except as needed to meet important resource management and/or restoration objectives.	X	
115. Develop and maintain non-pond/reservoir watering facilities, such as troughs and bottomless tanks, to provide livestock water.	X	
116. For most spring developments or wells, mosquito breeding habitat usually is not an issue. Flowing cold (less than 50° Fahrenheit) water and steep sides of the stock tanks are not conducive for egg laying or larvae production. If flows are low, the water is warm, or moss production is an issue in the tank, mosquito breeding habitat could exist in the tank.	X	
117. Maintenance of healthy wetlands at spring sources helps control mosquitoes and their larvae by providing habitat for natural predators such as birds, dragonflies and amphibians. Protecting the wetland at the spring source with a fence is an option to consider.		X
118. Clean and drain stock tanks before the season starts. If never cleaned or drained, many tanks will fill with silt or debris causing warmer water and heavy vegetation growth conducive to mosquito reproduction.		X
119. Draining tanks after the period of use is completed, particularly in warmer weather, also reduces potential habitat by eliminating stagnant standing water.		X
120. Maintain a properly functioning overflow to prevent water from flowing onto the pad and surrounding area, to eliminate or minimize pooling of water that is attractive to breeding mosquitoes.	X	
121. Clean or deepen overflow ponds to maintain colder temperatures to reduce mosquito habitat.		X
122. Install and maintain float valves on stock tank fill pipes to minimize overflow	X	
123. Harden stock tank pads to reduce tracks that can potentially hold water where mosquitoes may breed.	X	
124. Build ponds with steep shorelines to reduce shallow water (>60 cm) and aquatic vegetation around the perimeter of impoundments to deter colonizing by mosquitos (Knight et al. 2003, cited in NTT report page 61).	X	
125. Consider removing and controlling trees and shrubs to reduce		X

Measure	Required Design Feature (RDF)	RDF if appropriate and when the resources/values are present
shade and wind barriers on pit and reservoir shorelines if not needed for wildlife, fish, or recreational values.		
126. Impoundments that remain accessible to livestock and wildlife can cause tracking and nutrient enrichment from manure which can create favorable mosquito breeding habitat. Where this is a concern, it may be desirable to fence the reservoir and pipe the water to a tank.		X
127. Construct dams or impoundments that minimize down-slope seepage or overflow. Seepage and overflow results in down-grade accumulation of vegetated shallow water areas that support breeding mosquitoes.		X
128. On ponds and reservoirs with enough depth and volume, introduce native fish species, which feed on mosquito larvae.		X
129. Line the overflow of a dam's spillway with crushed rock and constructing the spillway with steep sides to preclude the accumulation of shallow water and vegetation to reduce mosquito habitat.		X
130. Where an existing reservoir has filled with silt, consider cleaning to reduce shallow water habitat conducive to mosquito reproduction.		X
131. During confirmed West Nile virus outbreaks in sage-grouse habitat, consider larvicide applications.		X
<b>Travel Management Required Design Features</b>		
132. Designate or design routes to direct use away from priority areas identified in Wildfire and Invasive Species Assessments and still provide for high-quality and sustainable travel routes and administrative access, legislatively mandated requirements, and commercial needs	X	
<b>Recreation Required Design Features</b>		
133. Direct use away from GRSG priority areas as described in the Wildfire and Invasive Species Assessments.	X	
134. Eliminate or minimize external food sources for corvids.		X



**Appendix B – Seasonal Timing Restriction**

During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6:00 p.m. and 9:00 a.m. to avoid disturbance to lekking and roosting sage-grouse.

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<b>Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
<b>Incidental disturbance to individual GRSG within all habitat types during all seasons</b>			
	Public or administrative activities that include incidental foot, aerial, horseback, or other similar travel.	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.
	Livestock grazing activities (except where specifically noted below).	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.
	Public vehicle travel not otherwise restricted in Travel Management Plans; or administrative vehicle travel on existing routes for maintenance of existing infrastructure, facilities, or vegetation projects; or non-organized/non-permitted activities.	None.	Impacts from these type of activities are immeasurable and would not warrant any minimization measures.
<b>Loss (i.e. death) of nests/eggs, chicks and/or adults that may occur within the nesting<sup>4</sup> habitat during the nesting season</b>			
	Anthropogenic activities such as the use of heavy equipment <sup>2</sup> or	BMP Priority, Important, General: Avoid these activities within nesting	Application of the seasonal nesting habitat restriction would avoid and

<b>Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
	targeted grazing in nesting habitat <sup>3</sup> for: 1) implementation of fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events	habitat during the nesting <sup>3</sup> season.	minimize the loss of nests/chicks/hens. This is a BMP since the impact is loss of individual grouse and is small scale and not population-scale. Disallowing infrastructure maintenance or construction in nesting habitat outright may not be realistic as an RDF. Impacts may be able to be offset via appropriate mitigation.
	Bedding Sheep & Associated Camps	BMP: Priority, Important, General: During the nesting season, locate bedding areas and camps outside of sagebrush areas <sup>3</sup> .	Application of the seasonal nesting habitat restriction would avoid/minimize the loss of nests/chicks by focusing bedding and camps in areas not meeting nest habitat characteristics for sagebrush cover (i.e., use areas less than 15% canopy cover).
	Fences	Existing Fences:  RDF: Priority and Important; BMP for General- Where consistent with policy, laws and/or regulations relative to Wilderness, Wilderness Study Areas and Visual Resource Management, move, modify (e.g. lay down fences) or mark existing fences to reduce collision risk within areas that have a high	Application of these measures would avoid/minimize the loss of birds to fence strikes.

<b>Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
		probability of fence strikes (per Stevens et al. 2012 model or latest science).	
		New Fences:  RDF: Priority and Important; BMP for General- Do not construct new fences within areas of high collision risk unless marked or modified, consistent with policy, laws and/or regulations relative to Wilderness, Wilderness Study Areas and Visual Resource Management .	
<b>Permanent functional or physical loss of a lek or declining attendance at lek<sup>4</sup></b>			
	Unleased fluid minerals	Stipulation: Priority, Important, General: Do not allow wells, pads, facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek.  Stipulation: Priority, Important, General: Limit average well pad density to no more than 1 per 640 acres within nesting <sup>3</sup> and winter <sup>3</sup> habitat.	This impact may have a population level effect and trip a population trigger therefore we recommended this be an RDF. Recent literature says 0.25 mile and 0.6 mile buffers are not sufficient (Harju et al. 2010). Hess (2011 MS Thesis) found statistical evidence that oil/well pad influence extended as far as 1.6 km from grouse leks. The 1/640 density per based on consideration of 1) Harju et al. (2010) who found pad density of

## Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
			1.54 pad/sq km (1 pad/247 ac) had 13-74% lower attendance at leks and 2) Doherty (2008 page iii and 79) who noted potential impacts from oil and gas development were indiscernible at ~1 well/640 acres. IDswMT biology team recommended a more conservative approach to minimize risk of tripping a population trigger, hence the 1/640.
	Commercial solar development	<p>RDF: Priority-No commercial solar development.</p> <p>RDF: Important- Do not allow new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek<sup>4</sup>.</p> <p>BMP-General: Avoid new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek<sup>4</sup>.</p>	No specific literature available relative to solar development. Recommended buffer is based on recent literature (Harju et al 2010) that 0.6 or 0.25 mile buffers are not. The 2 mile buffer is consistent with Connelly et al. 2000 regarding energy facilities (page 978).
	Roads	BMP: Priority, Important, General: Do not construct new paved or high volume traffic gravel roads within 0.8 mile (1.3 km) of leks <sup>4</sup> .	Patricelli et al. 2012 (Recommendations for interim protections in WY) recommended siting roads 0.7 to 0.8 miles from crucial seasonal habitat. We apply it

Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary			
Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
			here as a lek-centric BMP because we may need to construct a road near a lek (perhaps for fire operations/access or to allow access to private lands or per ROW need). If we buffer roads in the Priority or Important Areas via a large lek buffer, it may lead to disturbance of a much larger area of nesting habitat in the course of avoiding the lek and buffers. The BMP would at least allow for siting to avoid the lek, and reducing road noise near the lek, without compromising broader landscapes.
	Commercial/ industrial Pipelines (oil, gas, slurry, and similar)	BMP: Priority, Important, General. Minimize removal of sagebrush within 0.6 miles of leks <sup>4</sup> .	<p>Application of this measure is designed to minimize loss of sagebrush in the vicinity of the lek. The main concern was with loss of sagebrush in vicinity of lek, that is used by GRSG for cover. The 0.6 mile buffer is based on rationale in the Colorado GRSG Conservation Plan as below:</p> <p>BACKGROUND                      INFORMATION: From Colorado GRSG Conservation Plan                      Appendix B: [Lek Habitat (March</p>

Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary			
Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
			through mid-May) - The basis and rationale for the first radius, 0.6 miles from a lek (Fig. B-1), is developed by summarizing data from 5 separate studies of daytime movements of adult male sage-grouse during the breeding season (Carr 1967, Wallestad and Schladweiler 1974, Rothenmaier 1979, Emmons 1980, Schoenberg 1982), because daytime movements of adult male GRSG during the breeding season do not vary greatly. Wallestad and Schladweiler (1974) found daily movements of adult males ranged between 0.2 and 0.8 miles from leks, with a maximum cruising radius of 0.9 - 1.2 miles. Ellis et al. (1987) reported that dispersal flights of male GRSG (to day-use areas) ranged from 0.3 – 0.5 miles, with the longest flights ranging from 1.2 – 1.3 miles. Carr (1967) recorded a cruising radius for male GRSG that ranged from 0.9-1.1 miles. Rothenmaier (1979) found that 60-80% of male GRSG locations were within 0.6 - 0.7 miles of a lek. Emmons (1980) reported

<b>Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
			<p>that male dispersal distances to day-use areas of 0.1 miles were common and that 67% of all use areas were greater than 0.3 miles from the lek. In addition, Schoenberg (1982) found that male daily movements averaged 0.6 miles, but ranged from 0.02 - 1.5 miles.</p> <p>Male GRSG activity patterns during the breeding season include strutting during the early morning hours, feeding and loafing during the day, and roosting on the lek during the night. Grouse attending the lek do not always roost on the exact location where the strutting occurs the next morning. Occasionally (this is lek-dependent), grouse roost in adjacent sagebrush cover.</p> <p>Ultimately, male GRSG require an open area for strutting, and sagebrush immediately adjacent for feeding and loafing. Sagebrush adjacent to the lek is also used as escape cover from predators or other types of disturbance. Female GRSG that attend the lek also use</p>



## Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
			<p>the area in this zone in the same fashion as do males (Patterson 1952, Barnett and Crawford 1994, Coggins 1998).]</p> <p>Study locations noted above: Carr-Colorado; Wallestad and Schladweiller- Montana; Emmons-Colorado; Schoenberg- Colorado; Rothenmaier –unable to locate Univ. WY Thesis but study area not defined.</p>
	Miscellaneous anthropogenic structures/ activities (e.g., corrals, water windmills, apiaries, signs, informational kiosks, etc.)	BMP Priority, Important, General: Avoid human activities or placement of new structures as noted within 2 miles (3.2 km) mi of a lek <sup>4</sup> or ensure they are out of the viewshed of the lek.	This is a catch all to reduce impact of miscellaneous structures where possible (some are tall <sup>5</sup> , such as water windmill, some are small, but have human activity- such as kiosks) or activities not otherwise addressed in this table. Based on biology team discussion and input, and Connelly et al. 2000 Guidelines that state, “avoid building powerlines and other tall structures that provide perch sites for raptors within 3 km of seasonal habitats” (page 977). Avoiding “seasonal habitats” entirely by 3 km would preclude any of these activities at all

<b>Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
			in Priority, Important or General, but siting 2 miles + from leks as a BMP would nonetheless help protect leks from disturbance. Adding the “viewshed” caveat can help with siting in cases where topography or such screens view of the activity or structure.
	Campgrounds and other developed recreation facilities (trailheads etc.)	BMP: Priority, Important, General. Avoid development of new campgrounds or recreation facilities in nesting habitat.	Biology team discussion. No literature specific to this issue. Aldrich (2012) mentions GRSB avoidance threshold 2.5 km from any single development at patch scale.
	OHV Play or Open Areas	RDF-Priority and Important; BMP for General. No new Open or Play areas.	Rationale is to reduce risk for further noise, habitat loss, fire risk in the Priority, Important and General Areas.
	Solid Minerals		These measures for solid minerals are intended to reduce noise and human disturbance to lekking birds. Siting/ avoidance buffers not realistic due to the nature of mineral deposits.
		Locatables-BMP Priority,	Regulations 43 CFR 3809.420

Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary			
Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
		Important, General: Access roads and associated infrastructure not on the mining claim-Avoid disturbance to leks <sup>4</sup> during the lekking season.	performance standards, speak to T/E, and habitat. As a BMP, it provides an opportunity to work with the developer where we can, such as routing access roads etc., siting of facilities/infrastructure etc., that are off the claim, that we have some discretion with.
		Salables- RDF: Priority: Do not construct new salable development within 0.8 mile (1.3 km) of leks <sup>4</sup> .	<u>Salables</u> - No literature specific to salables but buffer distance is based on the noise literature for roads. See Patricelli et al. 2012 (WY recommendations for interim noise protections) that recommended siting roads 0.7 to 0.8 miles from crucial seasonal habitat. Chose RDF for Priority and BMP in Important and General habitat since new Salable pits (e.g., gravel) may be necessary to support road maintenance or improvement for access by fire operations or for other locally important factors.

Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary			
Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
		<p>Leasables-non-energy (e.g., phosphate)-</p> <p>RDF-Priority and Important: New phosphate leasing is administratively unavailable.</p> <p>BMP-Priority, Important, General- On existing leases avoid disturbance to leks<sup>4</sup> during the lekking season</p>	<p><u>Leasables:</u> None presently known in Priority based on current mapping, but Priority RDF included in case of a trigger trip and re-delineation of IDswMT subregional management areas.</p> <p>In “Important” there is only one such area with existing lease and Known Phosphate Lease Areas (KPLAs), just west of Bear. It is Federal mineral/private surface. No interest in surface mining but there is interest by a company in underground development. Company is proposing facilities on surface, but working with IDFG locally. Lek within .3 mile.</p> <p>BMP for lek disturbance for all Management Areas in case of trigger trip and IDswMT Management Area re-delineation and since there are some KPLAs in the General Management Area. Working with proponent to reduce lek disturbance is realistic and may take on different forms, such as</p>

<b>Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
			road access, placement of facilities, etc.. However, “exclusion” buffers are not realistic given the nature of the location of solid mineral deposits (i.e., cannot site elsewhere). For these, incorporation of appropriate mitigation, in addition to the lek BMP may need to be a primary focus.
	Wind development (commercial)	RDF: Priority-No commercial wind development .  BMP: Important and General: Avoid wind development in nesting and/or winter habitat.	<u>Wind</u> : Labeau et al. (2014) stated that erecting wind turbines at least 5 km from nesting and brood rearing habitat should reduce negative impacts, at least in the short term. However putting a 5 km (3 mile) buffer around leks in Important habitat, would create a defacto closure for the most part, inconsistent with the intent of the Important designation. Hence BMP to avoid placement in nesting or winter habitat.
	Communication Towers	RDF: Priority -Do not allow communication tower construction within 3 miles (5 km) of a lek <sup>4</sup> unless needed to address public safety needs.	Johnson et al. (2011 pg. 427) noted "Analogously, across all management areas there was a steady downward pattern of trends of lek counts as the number of

## Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
		BMP- Important and General-- Avoid communication tower construction within 3 miles (5 km) of a lek <sup>4</sup> unless needed to address public safety needs.	towers increased, either within 5 km (Fig. 21) or within 18 km (Fig. 22)."
	Transmission Lines	RDF: Priority, Important, General: Do not allow transmission line construction within 600 m of a lek.  BMP Priority, Important, General: Avoid transmission line construction within 2 miles (3.2 km) of a lek.	A 600 m GRSG avoidance zone reported per Gillan et al. (2013). No other spatial buffer supported by literature. While 600 m is a citable buffer, a 2 mile zone as BMP for Transmission is recommended as well. Based on Connelly et al. 2000 Guidelines to avoid tall structures in important seasonal habitats.
	Distribution Lines	BMP: Priority, Important and General-Avoid distribution line construction within 600 m of a lek or bury where possible	600 m, based on Gillan et al. BMP as this may not always be feasible.
<b>Temporary functional loss of a lek<sup>4</sup>. SEASONAL RESTRICTION</b>			
	BLM and Forest Service permitted anthropogenic activities that result in noise or visual disturbance that may lead to sustained avoidance of the lek during a particular lekking	RDF: Priority and Important- No repeated or sustained behavioral disturbance (e.g., visual, noise, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of	Recent literature says 0.25 mile and 0.6 mile buffers are not sufficient (Harju et al. 2010). Hess (2011 MS Thesis) found statistical evidence that oil/well pad influence extended

## Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
	season.	leks during the lekking season <sup>3</sup> .  BMP-General: Avoid repeated or sustained behavioral disturbance (e.g., visual, noise, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season <sup>3</sup> .	as far as 1.6 km (~ 1 mile) from grouse leks. . IDswMT biology team recommended a more conservative approach to managing disturbance to minimize risk of disturbance.
	Sheep Bedding & Sheep Camps	BMP Priority, Important, General: Avoid bedding sheep and placing camps within 0.6 mi of a lek during the lekking season.	No literature. BMP based on biology team consensus.
	Organized Recreational Events	RDF Priority and Important-Do not schedule disruptive recreational events (e.g., motorized races) within 2.0 miles (3.2 km) of occupied leks during the lekking season.  BMP General- Do not schedule disruptive recreational events (e.g., motorized races) within 2.0 miles (3.2 km) of occupied leks during the lekking season.	Biology team consensus. No specific literature relative to buffers for recreational events but can manage this through avoiding the appropriate season. This threat (organized recreational events) is a short term, typically one-day event, with temporary disruption from noise the main issue.
<b>Permanent functional or physical loss of nesting or winter habitat.</b>			

## Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
	Anthropogenic development or activities that result in loss of habitat or constant or repeated noise levels or objects on the landscape that result in permanent avoidance of the habitat.	Ensure > 80% of the landscape is functionally and physically meeting GRSG habitat objectives appropriate to the seasonal habitat <sup>3</sup> .	<p>Impacts resulting from loss of habitat vary depending on the extent of the habitat lost. Minimal loss of habitat (e.g. removal of small amounts of sagebrush cover) would not likely result in any measurable impacts to GRSG individuals or the associated populations.</p> <p>More extensive loss of habitat may result in increased probability of population level impacts, and trigger trips, through the increased probability that leks will no longer persist.</p>
	Roads	BMP: Priority, Important, General: Avoid construction of new paved or high volume traffic gravel roads within 0.8 mile (1.3 km) of nesting habitat.	See citations used for permanent loss of leks, above.
	Unreleased Fluid Minerals	Stipulation: Priority, Important, General: Limit average well pad density to no more than 1/640 acres within nesting <sup>3</sup> and winter <sup>3</sup> habitat.	See citations used for permanent loss of leks, above.
	Commercial Solar	RDF: Priority-No commercial solar	See citations used for permanent



<b>Idaho and Southwest Montana GRSB Buffers and Seasonal Restrictions Summary</b>			
<b>Impacts</b>	<b>Causes<sup>1</sup></b>	<b>Minimization Measures Seasonal/Timing Restrictions &amp; Buffers</b>	<b>Rationale</b>
		development.  RDF: Important: Do not allow facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek <sup>4</sup> .  BMP-Important: Avoid placing new facilities or associated above ground infrastructure within 2 miles (3.2 km) a lek <sup>4</sup> .	loss of leks, above.
	Campgrounds	BMP-Priority, Important, General. Avoid development of new campgrounds or recreation facilities in nesting habitat.	See citations used for permanent loss of leks, above.
	OHV Play and Open areas	RDF-Priority and Important. No new Open or Play areas. BMP-General: Avoid new Open or Play areas	See citations used for permanent loss of leks, above.
	Wind Development (commercial)	RDF Priority - No commercial wind development .  BMP: Important: Avoid wind development in nesting habitat	See citations used for permanent loss of leks, above.
<b>Temporary functional loss of winter habitat</b>			

## Idaho and Southwest Montana GRSG Buffers and Seasonal Restrictions Summary

Impacts	Causes <sup>1</sup>	Minimization Measures Seasonal/Timing Restrictions & Buffers	Rationale
	Anthropogenic activities that result in noise or visual disturbance that may lead to avoidance of a particular wintering area during a particular wintering season.	RDF: Priority, Important- No repeated or sustained disturbance from construction activities in winter habitat during the wintering season.  BMP General: Avoid repeated or sustained disturbance from construction activities in winter habitat during the wintering season.	No known buffer. Biology team recommendation.

<sup>1</sup> Land use allocations or activities provided below are examples, but are not limited to those listed.

<sup>2</sup> Heavy equipment includes but is not limited to: tractors, discs, drills, mowers, Lawson aerators, large sprayers, masticators, dozers, graders, large trucks, excavators, backhoes cranes.

<sup>3</sup> As per Habitat Objectives table. Based on local GRSG seasonal use dates. Lekking ~ March 1-May 2<sup>5</sup> depending on elevation; Nesting /early brood ~April 1-June 30; Winter ~December 1-February 28. Source-Modified from ISAC 2006.

<sup>4</sup> Occupied lek as per IDFG definitions (active during at least one of past 5 years). Undetermined status leks will be evaluated on a case by case at the site specific scale during project-level NEPA.

<sup>5</sup> Definition of "tall structure": Any structure that has the potential to disrupt lekking or nesting GRSG and/or decrease the use of an area. This includes but is not limited to communication towers, meteorological towers, electrical transmission or distribution towers, etc.

# Appendix D

## Wildfire and Invasive Species Assessments

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240-0036  
<http://www.blm.gov>

August 28, 2014

In Reply Refer To:  
6711 (AD-200, FA-100) I

EMS TRANSMISSION 09/03/2014  
Instruction Memorandum No. 2014-134  
Expires: 09/30/2015

**To:** State Directors: CA, ID, NV, OR, UT

**From:** Assistant Director, Resources and Planning

**Subject:** Completion of Wildfire and Invasive Species DD: 9/8/2014 & 1/30/2015  
Assessments in Greater Sage-Grouse Habitat

**Program Areas:** Wildlife, Special Status Species, Range, Forestry, Emergency Stabilization and Rehabilitation, Riparian, Plant Conservation, Fire Operations, Fire Planning, and Fuels Management

**Purpose:** This Instruction Memorandum (IM) provides guidance for Bureau of Land Management (BLM) offices to cooperate with interagency partners to complete "Step 2" of the Wildfire and Invasive Species assessments (hereafter called FIAT assessments) for six priority landscapes in Greater sage-grouse (hereinafter "sage-grouse") habitats. These assessments will help to quantify future planned actions by the BLM to inform the US Fish and Wildlife Service's sage-grouse listing decision in 2015. The FIAT assessments are also consistent with the direction provided in the *Identification of Multi-year Funding Priorities and Consideration for Healthy Lands Focal Areas IM (WO IM-2014-124)* and the *Sage-Grouse Habitat and Wildland Fire Management IM (WO IM-2014-114)*.

**Policy/Action:** The FIAT assessments will be used to develop collaborative implementation plans that address threats to sage-grouse resulting from invasive annual grasses, wildfires, and conifer expansion in Priority Areas for Conservation (PACs). The completion of this first round of the PAC assessments within the Great Basin will inform the next phase of assessments as the BLM continues to expand into other sage-grouse habitat into 2015, including the Rocky Mountain

States as appropriate.

The State offices listed in Attachment 1 will complete "Step 2" of the FIAT assessments for six priority landscapes in cooperation with interagency partners following the schedule as defined in the Action Plan and a description of the collaboration process and team structure. Attachment 2 illustrates the names and locations of the PACs. The June 2014 FIAT Assessment (Attachment 3) completed "Step 1" of the FIAT assessment process and provides guidance for completing "Step 2".

The FIAT assessments are non-decisional in nature, and involve two steps:

**Step 1:** This step has been completed and is documented in the June 2014 FIAT Assessment protocol (Attachment 3). Step 1 identified focal habitats where management strategies will be prioritized (within or near these important habitats), patterns of resistance to invasive annual grasses and resilience after disturbance, landscape sagebrush cover, and conifer expansion within the six PACs. In addition to presenting the regional context, outcomes of Step 1 included geospatial data which define focal habitats, high density sage-grouse populations, and their intersection with threat factors. This data will be provided to state offices and appropriate field offices to use in their assessments.

**Step 2:** State and local offices will utilize Step 1 information and local data to conduct the FIAT assessments for the six PACs. As described in Attachment 3, offices will utilize Step 1 geospatial data supplemented with appropriate local data to best describe local conditions, treatment needs, and management priorities in or around focal habitats in the six PACs. Outcomes from Step 2 will include spatially identified conservation activities for the program areas of Fuels Management, Habitat Recovery/Restoration, Fire Operations, and Post-Fire Rehabilitation.

The PACs which have been identified for initial assessments include multiple land ownerships, jurisdictions, and in most cases, multiple states requiring a collaborative approach in carrying out the assessments. Partners who will contribute to FIAT assessments include, but are not limited to, National Forests, State wildlife agencies, the Natural Resources Conservation Service, the US Fish and Wildlife Service, tribes, and other local partners.

State Directors need to identify a State lead and the names of the core members of their team to Doug Havlina ([dhavlina@blm.gov](mailto:dhavlina@blm.gov)), the national lead for this effort, by September 8, 2014. The core team members are expected to participate in a

training workshop in Reno, NV September 16-18. The purpose of the workshop is to familiarize team members with the FIAT process, describe the data requirements, and provide the teams with a consistent approach to complete FIAT assessments.

**Timeframe:** This IM is effective immediately. The FIAT assessments for the six initial PACs will be completed by January 30, 2015.

**Budget Impact:** Moderate; one-time costs will be incurred as field offices complete FIAT assessments with adjoining agencies.

**Background:** The FIAT assessment process was approved by BLM leadership at the 2013 sage-grouse Federal Family meetings in Denver, Colorado and Portland, Oregon. In addition, BLM's Sage-Grouse National Policy Team approved the process in June 2014.

Wildfires, invasive annual grasses, and conifer encroachment are identified as primary threats. These threats contribute to fragmentation of habitats, large scale conversion to unsuitable plant communities, and ultimately declining sage-grouse populations. The BLM is moving towards completion of Resource Management Plan (RMP) amendments and revisions by winter 2015 to address these and other threats. While RMPs describe goals, objectives, and management actions to conserve sage-grouse, they generally lack specificity related to project prioritization, extent and location. This information is important to the 2015 USFWS listing decision. As such, FIAT assessments fulfill a key role by providing quantified descriptions of future conservation actions to inform the sage-grouse listing decision.

This assessment relies in large part on concepts of resistance to invasive annual grasses and resilience following disturbance across sage steppe environmental gradients along with sage-grouse habitat landscape cover requirements (available as a U.S. Forest Service General Technical Report at:

[http://www.fs.fed.us/rm/pubs/rmrs\\_gtr326.html](http://www.fs.fed.us/rm/pubs/rmrs_gtr326.html)

**Manual/Handbook Sections Affected:** None.

**Coordination:** This IM has been coordinated between Resources and Planning (WO200), Fire and Aviation (FA100), Fire Operations (FA300), and Fire Planning and Fuels Management (FA600).

**Contacts:** Questions may be directed to Douglas Havlina ([dhavlina@blm.gov](mailto:dhavlina@blm.gov)) Natural Resource Specialist - Fire Ecology, 208-387-5061.

Signed by:  
Edwin L. Roberson  
Assistant Director  
Resources and Planning

Authenticated by:  
Robert M. Williams  
Division of IRM Governance, WO-860

3 Attachments:

[1-Priority PACs for Initial Assessments/Fire and Invasives Assessment Action Plan \(2 pp\)](#)

[2-Map of PACs for FIAT Assessments in Management Zones III, IV, & V \(1 p\)](#)

[3-Greater Sage-Grouse Wildfire, Invasive Annual Grasses & Conifer Expansion Assessment - June 2014 \(43 pp\)](#)

## Priority PACs for Initial Assessments / Fire and Invasives Assessment Action Plan

<b>Priority PAC</b>	<b>BLM State Office Responsible for FIAT Completion</b>	<b>BLM District Offices which intersect priority PAC</b>
Central Oregon	Oregon	Burns, OR Lakeview, OR Prineville, OR
Northern Great Basin (Includes Box Elder in Utah and Management Zone IV portion of the Northern Great Basin/Western Great Basin PAC in Southeast Oregon)	Idaho (in coordination w/ UT)	Boise, ID Burns, OR Elko, NV Idaho Falls, ID Twin Falls, ID Vale, OR West Desert, UT Winnemucca, NV
Southern Great Basin (Includes Hamlin Valley in Utah)	Nevada (in coordination w/ UT)	Battle Mountain, NV Carson City, NV Color Country, UT Elko, NV Ely, NV
Snake, Salmon, and Beaverhead	Idaho	Boise, ID Idaho Falls, ID Twin Falls, ID
Western Great Basin and Warm Springs Valley NV/Western Great Basin (Includes Management Zone V portion of the Northern Great Basin/Western Great Basin PAC in Southeast Oregon)	California	Burns, OR Carson City, NV Lakeview, OR North California, CA Vale, OR Winnemucca, NV

## Fire and Invasives Assessment Action Plan

State Directors assign team members and coordinator for priority landscapes.	September 3, 2014
Initial FIAT Process Coordination Call for State leads– Process Overview; Data Coordination; Report Template of What, Where, Why (Who, When, & How and Implementation); examples of expected deliverables; Training session logistics and details.	September 8, 2014
Training Session for All *Core Team members – Nevada State Office	September 16-18, 2014
Coordination Calls with Team Leaders	Every Two Weeks Starting October 1
Initial Draft Assessment Coordination Webinar	January 5, 2015
Final Draft for Great Basin Regional Management Team Review with State Directors	January 23, 2015
Final Assessments Approved by State Directors	January 30, 2015



### **Process for Collaboration**

Priority landscapes involve multiple ownerships, jurisdictions, and in most cases, multiple states. Consequently, the affected Bureau of Land Management (BLM) State Offices will work cooperatively to complete assessments. Partners which may contribute to FIAT assessments include National Forests managed by the U.S. Forest Service within priority landscapes, the Natural Resources Conservation Service, the USFWS, tribes, State wildlife agencies, and other local partners. A specific BLM State Office has been assigned as the lead for each of the six FIAT assessments (see above).

It is imperative that the assessment teams coordinate with the teams assessing adjacent priority landscapes and appropriate FIAT Development Team members. The Western Great Basin and Warm Springs Valley NV/Western Great Basin priority landscapes will be combined into one assessment for priority consistency across the areas and process efficiency. Similarly, the Northern Great Basin assessment will include the Box Elder PAC in Utah and the Management Zone IV portion of the Northern Great Basin/Western Great Basin PAC in Southeast Oregon. The Southern Great Basin PAC assessment will include the Hamlin Valley in Utah and the Management Zone V portion of the Northern Great Basin/Western Great Basin PAC in Southeast Oregon.

A FIAT training workshop will take place at Nevada State Office in Reno Nevada on September 16-18, 2014. The outcome of the training will be to familiarize designated team members with the FIAT process, understand the data requirements and provide the teams with a consistent approach to complete the FIAT assessment.

The employees required to attend the training will include the Sage Grouse Management Zone Project Team Lead, the project zone GIS Specialist, and two other team members designated by the Project Team Lead. The structure of this team may vary slightly given the requirements of each State. Select members of the FIAT Development Team will be involved in training, technical assistance, and review as assessments are conducted. State points-of-contact will coordinate attendance with Doug Havlina, meeting coordinator, at (208) 387-5061.

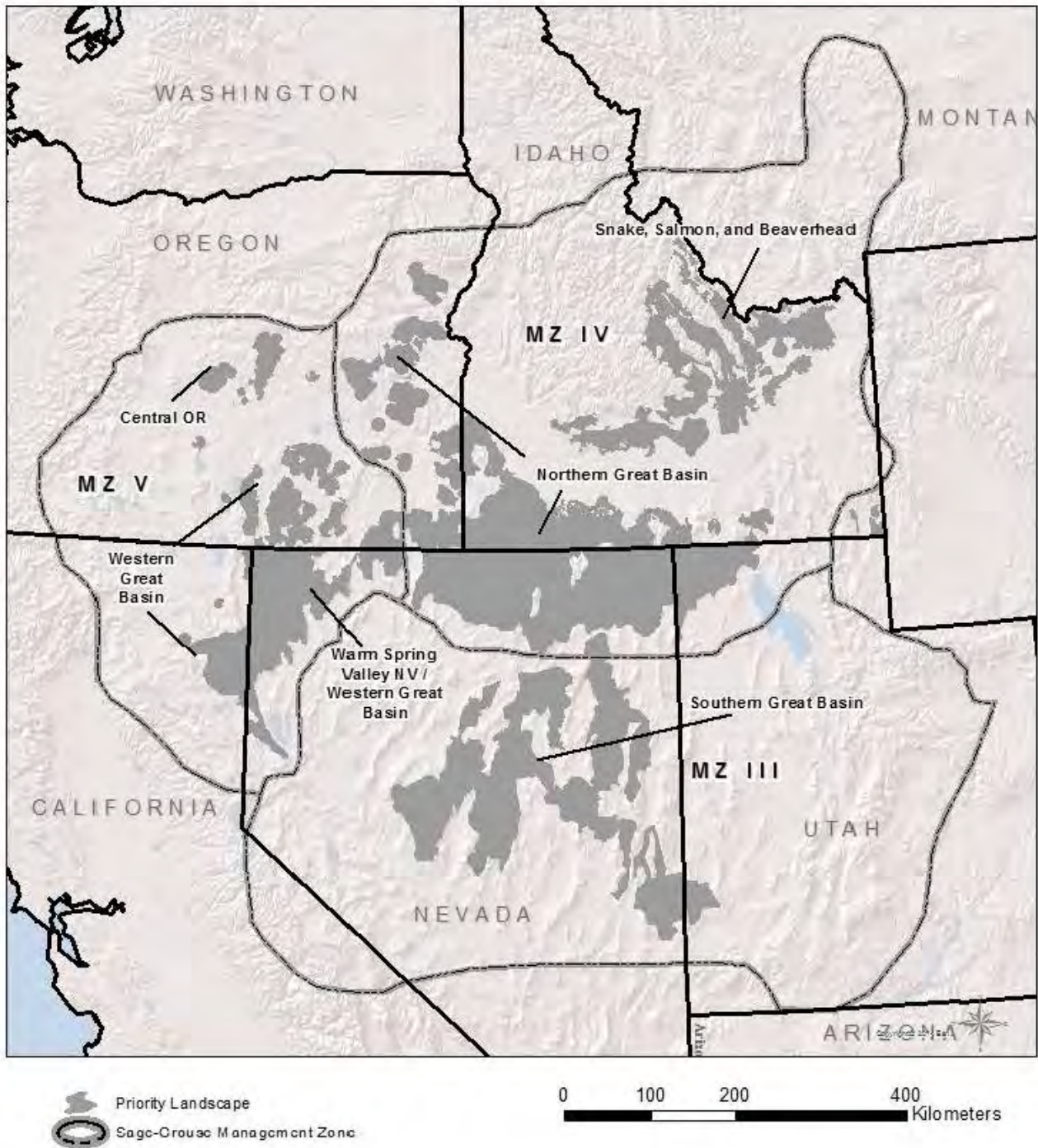
### **Core Team Structure**

The State will determine the membership of their team(s). The suggested teams should include the following positions:

1. Team Lead \*
2. GIS Specialist \*
3. Fire Planner
4. Fuels Specialist
5. Vegetation (Restoration) Specialist
6. Wildlife Biologist
7. Ecologist
8. Forester/Woodland Management Specialist
9. Writer- Editor
10. FWS Liaison
11. FS Liaison (Management Zones III & IV)
12. State Agencies
13. NRCS Liaison

\*Core team members

Map of PACs for FIAT Assessments in Management Zones III, IV, & V



# Greater Sage-Grouse Wildfire, Invasive Annual Grasses & Conifer Expansion Assessment

June 2014



## Introduction and Background

The purpose of this assessment is to identify priority habitat areas and management strategies to reduce the threats to Greater Sage-Grouse resulting from impacts of invasive annual grasses, wildfires, and conifer expansion. The Conservation Objectives Team (COT) report (USFWS 2013) and other scientific publications identify wildfire and conversion of sagebrush habitat to invasive annual grass dominated vegetative communities as two of the primary threats to the sustainability of Greater Sage-Grouse (*Centrocercus urophasianus*, hereafter sage-grouse) in the western portion of the species range. For the purposes of this assessment protocol, invasive species are limited to, and hereafter referred to, as **invasive annual grasses** (e.g., primarily cheatgrass [*Bromus tectorum*]). Conifer expansion (also called encroachment) is also addressed in this assessment.

The United States Fish and Wildlife Service (USFWS) will consider the amelioration of impacts, location and extent of treatments, degree of fire risk reduction, locations for suppression priorities, and other proactive measures to conserve sage-grouse in their 2015 listing decision. This determination will be made based in part upon information contained in the United States (US) Department of the Interior, Bureau of Land Management (BLM) resource management plan (RMP) amendments and Forest Service land resource management plan (LRMP) amendments, including this assessment.

This assessment is based in part on National Resources Conservation Service (NRCS) soil surveys that include geospatial information on soil temperature and moisture regimes associated with resistance and resiliency properties (see following section on *Soil Temperature and Moisture Regimes*). While this assessment is applicable across the range of sage-grouse, the analysis is limited to Western Association of Fish and Wildlife Management Agencies' (WAFWA) Management Zones III, IV, and V (roughly the Great Basin region) because of the significant issues associated with invasive annual grasses and the high level of wildfires in this region. The utility of this assessment process is dependent on incorporating improved information and geospatial data as it becomes available. Although the resistance and resilience concepts have broad applications (e.g., infrastructure development), this assessment is limited to developing strategies to reduce threats to sage-grouse habitat (e.g., invasive annual grasses and wildfires).

Draft Greater Sage-Grouse Environmental Impact Statements (EISs) contain a suggested framework in the appendices ("Draft Greater Sage-Grouse Wildland Fire and Invasive Species Assessment") that provided a consistent approach to conduct these assessments. The current protocol was developed by the Fire and Invasive Species Team (FIAT), a team of wildland fire specialists and other resource specialists and managers, to specifically incorporate resistance to invasive annual grasses and resilience after disturbance principles into the assessment protocol. In October 2013, the BLM, Forest Service, and USFWS agreed to incorporate this approach into the final EISs.

The cornerstone of the FIAT protocol is recent scientific research on resistance and resilience of Great Basin ecosystems (Chambers et al. *In press*) and the USFWS-sponsored project with the Western Association of Fish and Wildlife Agencies (WAFWA) to assemble an interdisciplinary team to provide additional information on wildland fire and invasive plants and to develop strategies for addressing

these issues. This interagency collaboration between rangeland scientists, fire specialists, and sage-grouse biologists resulted in the development of a strategic, multi-scale approach for employing ecosystem resilience and resistance concepts to manage threats to sage-grouse habitats from wildfire and invasive annual grasses (Chambers et al. *In prep.* ). This paper is being published as a Forest Service Rocky Mountain Research Station General Technical Report and is available at [www.rockymountainresearchstation.fs.fed.us](http://www.rockymountainresearchstation.fs.fed.us). It serves as the reference and basis for the protocol described in this assessment.

The assessment process sets the stage for:

- Identifying important sage-grouse occupied habitats and baseline data layers important in defining and prioritizing sage-grouse habitats
- Assessing the resistance to invasive annual grasses and resilience after disturbance and prioritizing focal habitats for conservation and restoration
- Identifying geospatially explicit management strategies to conserve sage-grouse habitats

Management strategies are types of actions or treatments that managers typically implement to resolve resource issues. They can be divided into proactive approaches (e.g., fuels management and habitat recovery/restoration) and reactive approaches (e.g., fire operations and post-fire rehabilitation). Proactive management strategies can favorably modify wildfire behavior and restore or improve desirable habitat with greater resistance to invasive annual grasses and/or resilience after disturbances such as wildfires. Reactive management strategies are employed to reduce the loss of sage-grouse habitat from wildfires or stabilize soils and reduce impacts of invasive annual grasses in sage-grouse habitat after wildfires. Proactive management strategies will result in long-term sage-grouse habitat improvement and stability, while reactive management strategies are essential to reducing current impacts of wildfires on sage-grouse habitat, thus maintaining long-term habitat stability. Management strategies include:

#### **Proactive Strategies-**

1. **Fuels Management** includes projects that are designed to change vegetation composition and/or structure to modify fire behavior characteristics for the purpose of aiding in fire suppression and reducing fire extent.
2. **Habitat Restoration/Recovery**
  - a. Recovery, referred to as passive restoration (Pyke 2011), is focused on changes in land use (e.g., improved livestock grazing practices) to achieve a desired outcome where the plant community has not crossed a biotic or physical threshold.
  - b. Restoration is equivalent to active restoration (Pyke 2011) and is needed when desired species or structural groups are poorly represented in the community and reseeding, often preceded by removal of undesirable species, is required. Note: The Fuels Management program supports recovery/restoration projects through its objective to restore and maintain resilient landscapes.

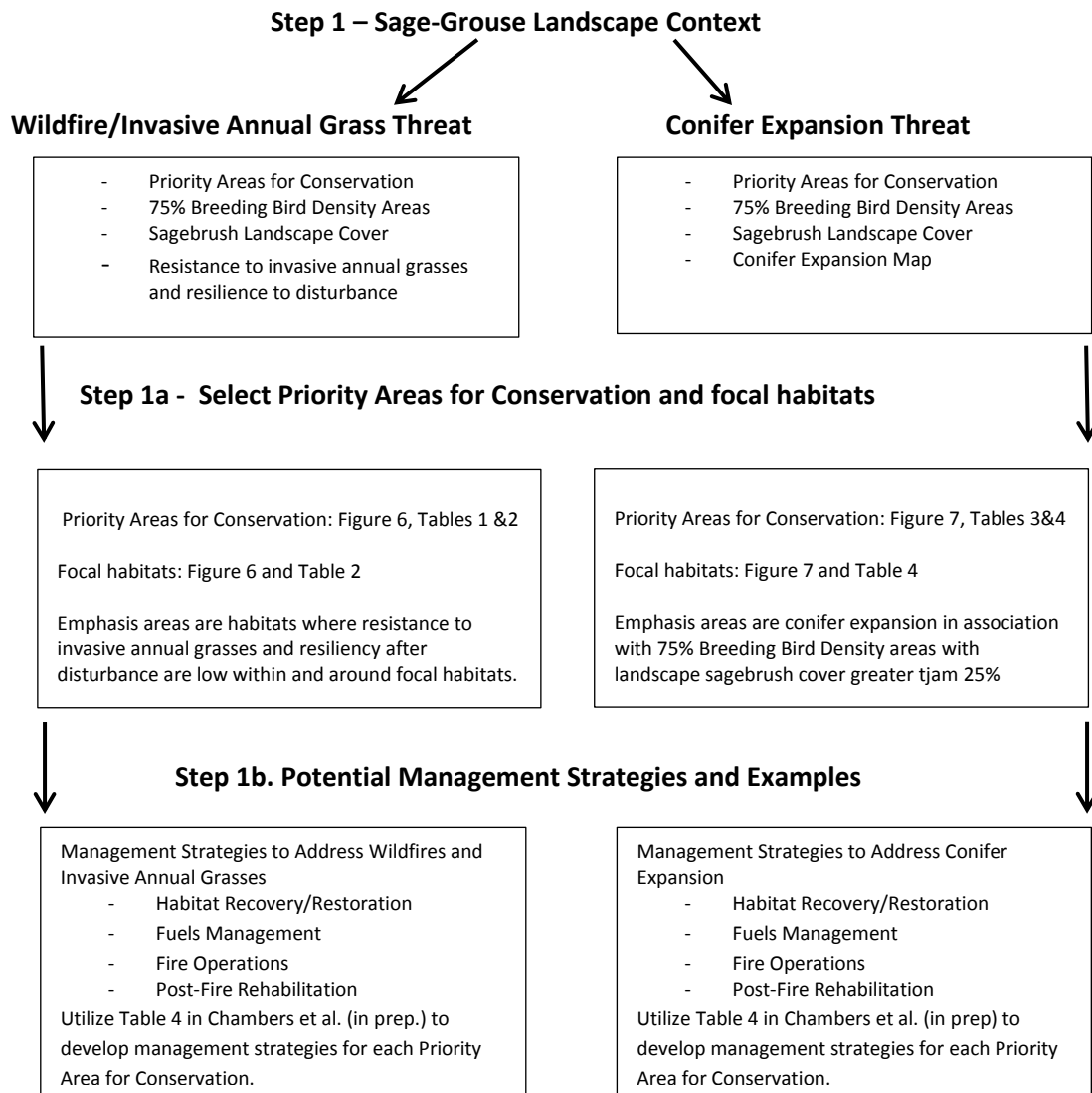
#### **Reactive Strategies-**

3. **Fire Operations** includes preparedness, prevention, and suppression activities. When discussing specific components of fire operations, the terms fire preparedness, fire prevention and fire suppression are used.
4. **Post-Fire Rehabilitation** includes the BLM's Emergency Stabilization and Rehabilitation (ES&R) Program and the Forest Service's Burned Area Emergency Response (BAER) Program. Policy limits application of funds from 1 to 3 years, thus treatments to restore or enhance habitat after this period of time are considered habitat recovery/restoration.

The assessment process included two steps with sub-elements. First, important Priority Areas for Conservation (PACs) and focal habitats are identified (**Step 1a**). Second, potential management **strategies** (described above) are identified to conserve or restore focal habitats threatened by wildfires, invasive annual grasses, and conifer expansion (primarily pinyon pine and/or juniper species; **Step 1b**). Focal habitats are the portions of a PAC with important habitat characteristics, bird populations, and threats (e.g., wildfires, invasive annual grasses, and conifer expansion) where this assessment will be applied. Areas adjacent to or near the focal habitats can be considered for management treatments such as fire control and fuels management if these locations can reduce wildfire impacts to focal habitats. Soil temperature and moisture regimes are used to characterize capacity for resistance to invasive annual grasses and resilience after disturbance (primarily wildfires) within focal habitats to assist in identifying appropriate management strategies, especially in areas with good habitat characteristics that have low recovery potential following disturbance. Soil moisture and temperature regime relationships have not been quantified to the same degree as for conifer expansion; however, Chambers et al. (*In prep.*) discuss preliminary correlations between these two variables.

The results of Steps 1a and 1b, along with associated geospatial data files, are available to local management units to complete Step 2 of the assessment process. Step 2 is conducted by local management units to address wildfire, invasive annual grasses, and conifer expansion in or near focal habitat areas. First, local information and geospatial data are collected and evaluated to apply and improve on Step 1 focal habitat area geospatial data (**Step 2a**). Second, focal habitat activity and implementation plans are developed and include prioritized management **tactics and treatments** to implement effective, fuels management, habitat recovery/restoration, fire operations, and post-fire rehabilitation strategies (**Step 2b**). This assessment will work best if Step 2b is done across management units (internal and externally across BLM and Forest Service administrative units and with other entities). **Figure 1**, Assessment Flow Chart, contains an illustration of the steps in the assessment process.

This analysis does not necessarily address the full suite of actions needed to maintain the current distribution and connectivity of sage-grouse habitats across the Great Basin because resources available to the federal agencies are limited at this time. Future efforts designed to maintain and connect habitats across the range will be needed as current focal areas are addressed and additional resources become available.



**Step 2 – Management Unit Applications for Invasive Annual Grasses and Conifer Expansion**

**Step 2a**

- 1) Evaluate the accuracy and utility of Step 1 geospatial layers and incorporate relevant local information.
- 2) Develop framework for incorporating management strategies to initiate implementation/activity plans.

**Step 2b**

Develop collaborative implementation/activity plans to address threats to focal habitats in Priority Areas for Conservation.

**Figure 1, Assessment Flow Chart**

## Step 1

The first component of the Wildfire and Invasive Annual Grasses Assessment describes the factors that collectively provide the sage-grouse landscape context. Step 1a provides this context by discussing PACs, breeding bird density (BBD), soil temperature and moisture regimes (indicators of resistance to annual grasses and resilience after disturbance), landscape sagebrush cover, and conifer expansion. See Chambers et al. (2014 in prep.) for a detailed description of Invasive Annual Grass and Wildfire threats to sage-grouse habitat. Priority PACs and focal habitats are derived from the information provided in this sage-grouse landscape context section.

### Step 1a- Sage-grouse landscape context

This component of the assessment identifies important PACs and associated focal habitats where wildfire, invasive annual grasses, and conifer expansion pose the most significant threats to sage-grouse.

The primary focus of this assessment is on sage-grouse populations across the WAFWA Management Zones III, IV, and V (**Figure 2**, Current PACs for WAFWA Management Zones III, IV, and V). Sage-grouse are considered a landscape species that require very large areas to meet their annual life history needs. Sage-grouse are highly clumped in their distribution (Doherty et al. 2010), and the amount of landscape cover in sagebrush is an important predictor of sage-grouse persistence in these population centers (Knick et al. 2013). States have used this information combined with local knowledge to identify PACs to help guide long-term conservation efforts. FIAT used data sets that were available across the three management zones as an initial step for prioritizing selected PACs and identifying focal habitats for fire and invasive annual grasses and conifer expansion assessments. These data sets (also described in Chambers et al. *In prep.* ) include:

#### Priority Areas for Conservation (PACs)

PACs have been identified by states as key areas that are necessary to maintain redundant, representative, and resilient sage-grouse populations (USFWS 2013; see Figure 2). A primary objective is to minimize threats within PACs (e.g., wildfire and invasive annual grasses impacts) to ensure the long-term viability of sage-grouse and its habitats. A secondary priority is to conserve sage-grouse habitats outside of PACs since they may also be important for habitat connectivity between PACs (genetic and habitat linkages), habitat restoration and population expansion opportunities, and flexibility for managing habitat changes that may result from climate change. PACs have also been identified by the USFWS as one of the reporting geographic areas that will be considered during listing determinations for sage-grouse.

The combination of PACs with BBD data (described below) assists us in identifying connectivity between populations. PAC boundaries may be modified in the future requiring adjustments in focal habitat areas and management strategy priorities.



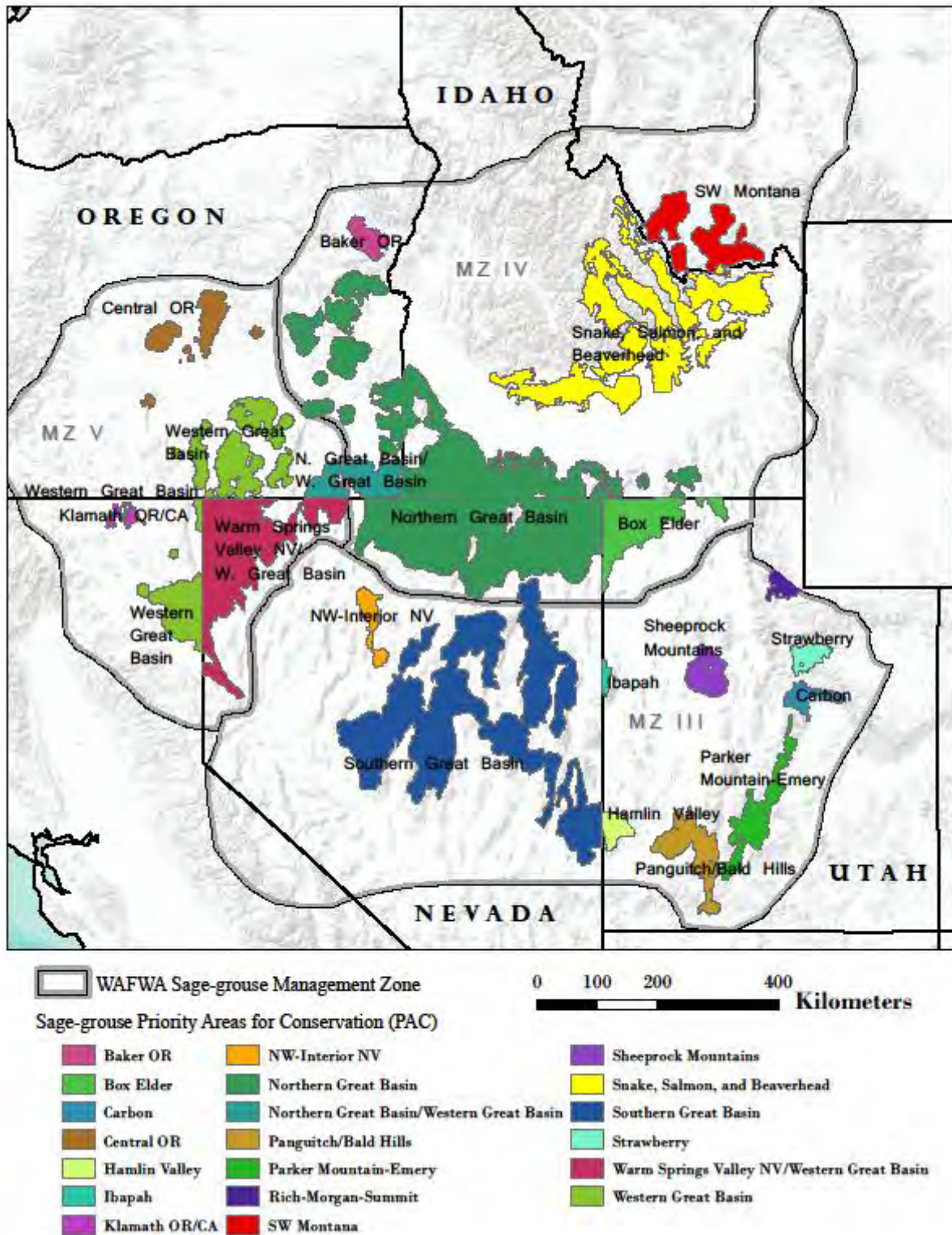


Figure 2, Current PACs for WAFWA Management Zones III, IV, and V. Bi-State sage-grouse populations were not included for this analysis and are being addressed in separate planning efforts.

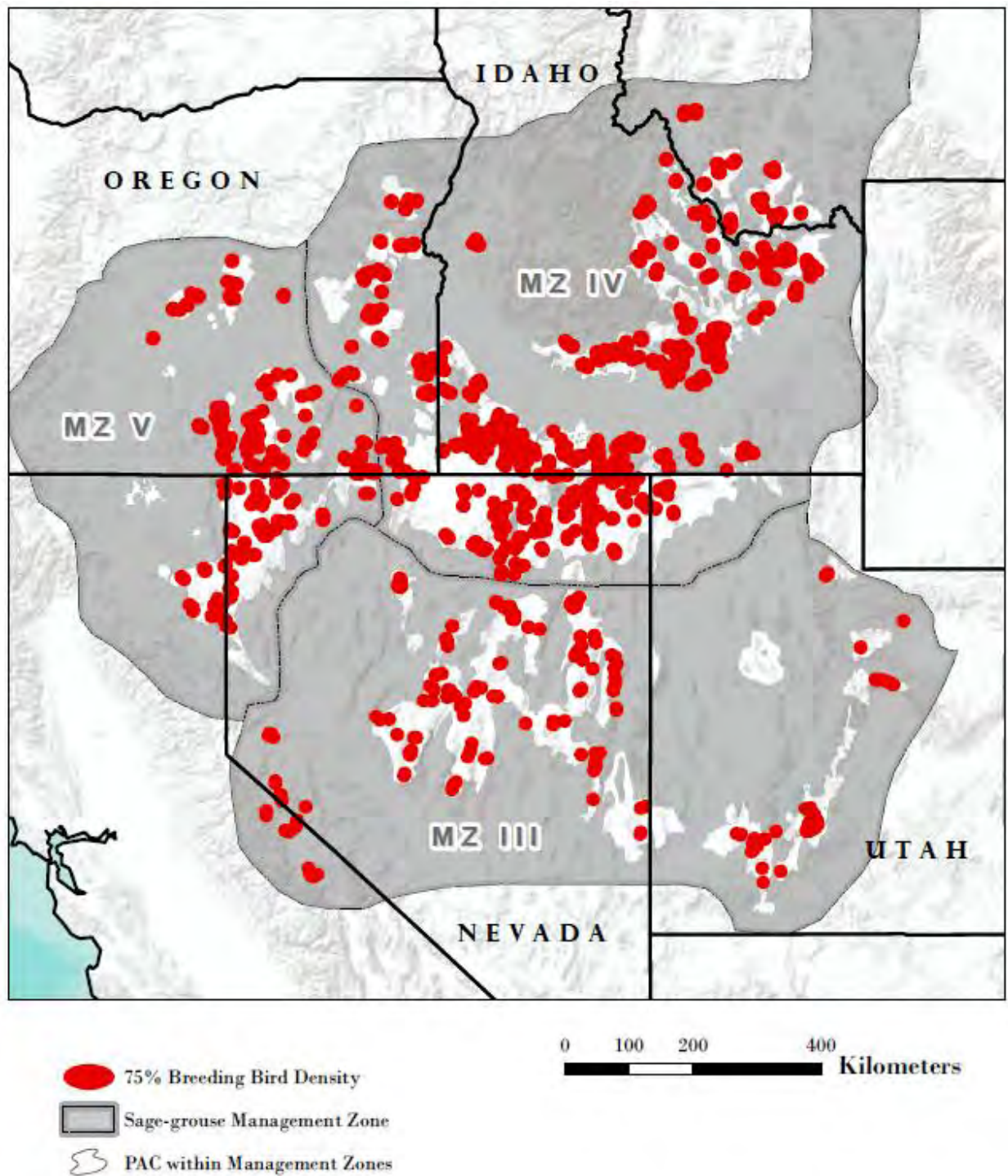
### Breeding Bird Density

Doherty et al. (2010) provided a useful framework for identifying population concentration centers in their range-wide BBD mapping. FIAT used maximum counts of males on leks (4,885 males) to delineate breeding bird density areas that contain 25, 50, 75, and 100 percent of the known breeding population. Leks were then mapped according to abundance values and buffered by 4 to 5.2 miles (6.4 to 8.5 kilometers) to delineate nesting areas. Findings showed that while sage-grouse occupy extremely large landscapes, their breeding distribution is highly aggregated in comparably smaller identifiable population centers; 25 percent of the known population occurs within 3.9 percent (7.2 million acres [2.92 million hectares]) of the species range, and 75 percent of birds are within 27 percent of the species range (50.5 million acres [20.4 million hectares]; Doherty et al. 2010). See **Figures 3**, Sage-Grouse Breeding Bird Density Thresholds.

This analysis places emphasis on breeding habitats because little broad/mid-scale data exists for associated brood-rearing (summer) and winter habitat use areas. Finer scale seasonal habitat use data should be incorporated (or, if not available studies, should be conducted) at local levels to ensure management actions encompass all seasonal habitat requirements. Federal administrative units should consult with state wildlife agencies for additional seasonal habitat information.

For this assessment, FIAT chose to use the 75 percent BBD as an indicator of high bird density areas that informed the approach used by state wildlife agencies to initially identify PACs. Range-wide BBD areas provide a means to further prioritize actions within relatively large PACs to maintain bird distribution and abundance. FIAT used state level BBD data from Doherty et al. (2010) instead of range-wide model results to ensure important breeding areas in Management Zones III, IV, and V were not underweighted due to relatively higher bird densities in the eastern portion of the range. BBD areas of 75 to 100 percent are included in Appendix 1 to provide context for local management units when making decisions concerning connectivity between populations and PACs.

Note that breeding density areas were identified using best available information in 2009, so this range-wide data does not reflect the most current lek count information and changes in conditions since the original analysis. Subsequent analysis should use the most current information available. Also, BBD areas should not be viewed as rigid boundaries but rather as a means to regionally prioritize landscapes where step down assessments and actions should be implemented quickly to conserve the most birds.



**Figure 3, Sage-Grouse Breeding Bird Density Thresholds** for 75% of the breeding birds, Management Zones, and PACs. Breeding bird density of 75 to 100% is shown in Appendix 1 to provide context for local management units when making decisions concerning connectivity between populations and PACs.

### Soil Temperature and Moisture Regimes

Invasive annual grasses and wildfires can be tied to management strategies through an understanding of resistance and resilience concepts. Invasive annual grasses has significantly reduced sage-grouse habitat throughout large portions of its range (Miller et al. 2011). While abandoned leks were linked to increased nonnative annual grass presence, active leks were associated with less annual grassland cover than in the surrounding landscape (Knick et al. 2013). Invasive annual grasses also increases fire frequency, which directly threatens sage-grouse habitat and further promotes the establishment of invasive annual grasses (Balch et al. 2013). This nonnative annual grass and fire feedback loop can result in conversion from sagebrush shrublands to annual grasslands (Davies 2011).

In cold desert shrublands, vegetation community resistance to invasive annual grasses, especially cheatgrass, and resilience following disturbance is strongly influenced by soil temperature and moisture regimes (Chambers et al. 2007; Meyer et al. 2001). Generally, cooler and moister soil temperature/moisture regimes are associated with more resilient vegetation communities as indicated by increases in vegetation productivity and ability to compete and recover from disturbance along elevation gradients (Chambers et al. 2007; Chambers et al. *in press*). Also, colder soil temperatures are associated with more resistant communities due to limitations on invasive annual grass growth and reproduction. Thus, communities with warm and dry soil temperature and moisture regimes tend to have relatively low resilience and resistance. Communities with cool and dry soil temperature and moisture regimes also can have relatively low resilience and resistance with the degree of resistance to cheatgrass depending on soil temperature (see Figure 9 in Chambers et al. *In prep.*). A continuum in resistance and resilience exists across soil temperature and moisture regimes that will need to be considered when developing implementation or activity plans in Step 2. These relationships can be used to help prioritize management actions within sage-grouse habitat using broadly available data.

To capture relative resistance and resilience to disturbance and invasive annual grasses across the landscape, soil temperature and moisture regime information (described in greater detail in Chambers et al. *In prep.*) were obtained from the Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO) data. Where gaps in this coverage existed, the NRCS US General Soil Map (STATSGO2) data was used (Soil Survey Staff 2014; see Appendix 1). The STATSGO2 database includes soils mapped at a 1:250,000-scale; the SSURGO database includes soils mapped at the 1:20,000 scale. Interpretations made from soil temperature and moisture regimes from the STATSGO2 database will not have the same level of accuracy as those made from the SSURGO database.

Areas characterized by warm and dry soil temperature and moisture regimes (low relative resistance and resilience) were intersected with sage-grouse breeding habitat and sagebrush landscape cover to identify candidate areas (emphasis areas) for potential management actions that mitigate threats from invasive annual grasses and wildfire (**Figure 4**, Soil Moisture and Temperature Regimes for Management Zones III, IV, and V, and **Figure 5**, Intersection of High Density (75% BBD) Populations). These data layers provide the baseline information considered important in prioritizing areas where conservation and management actions could be developed to address invasive annual grasses in a scientifically defensible manner (see Table 4 in Chambers et al. *In prep.*).

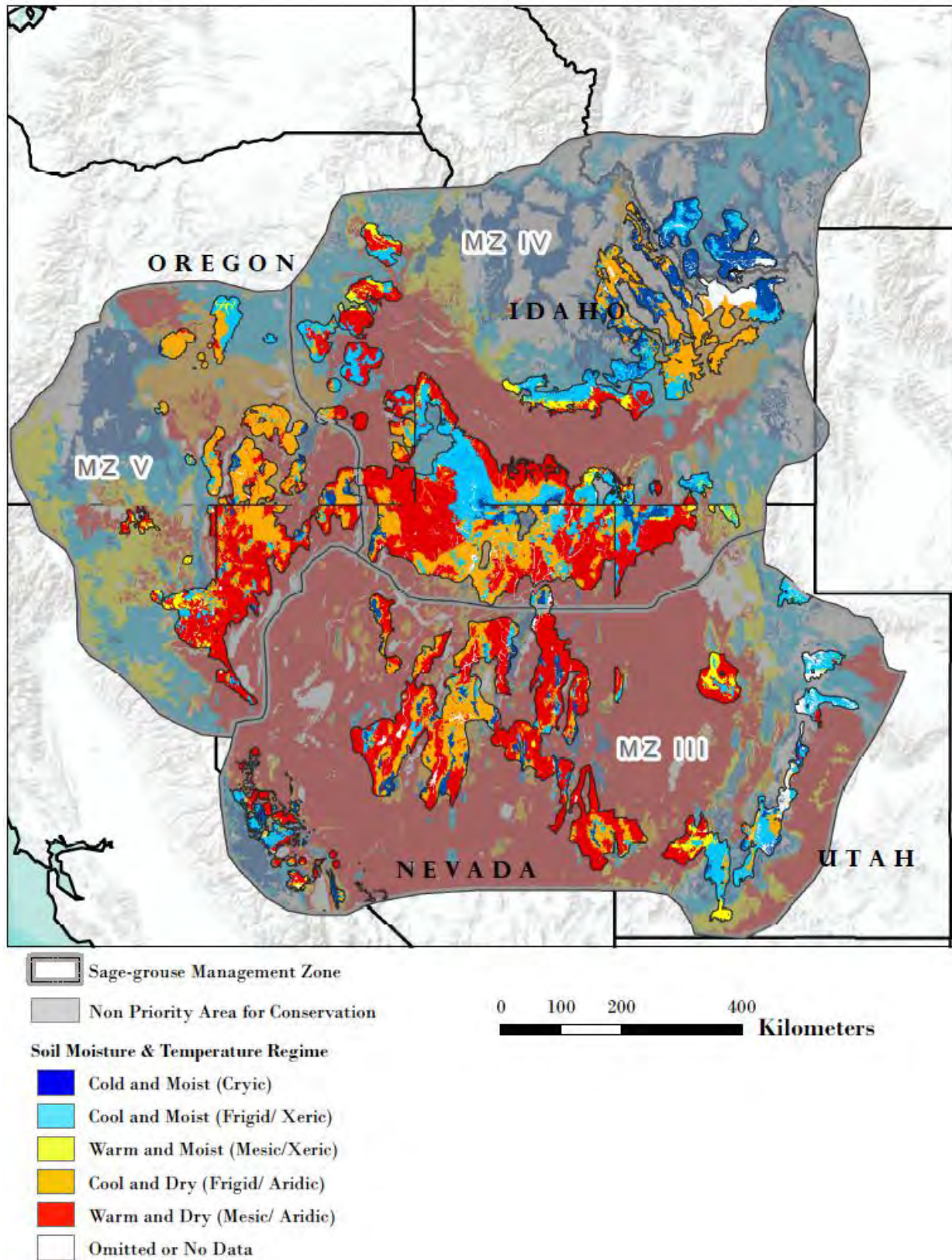
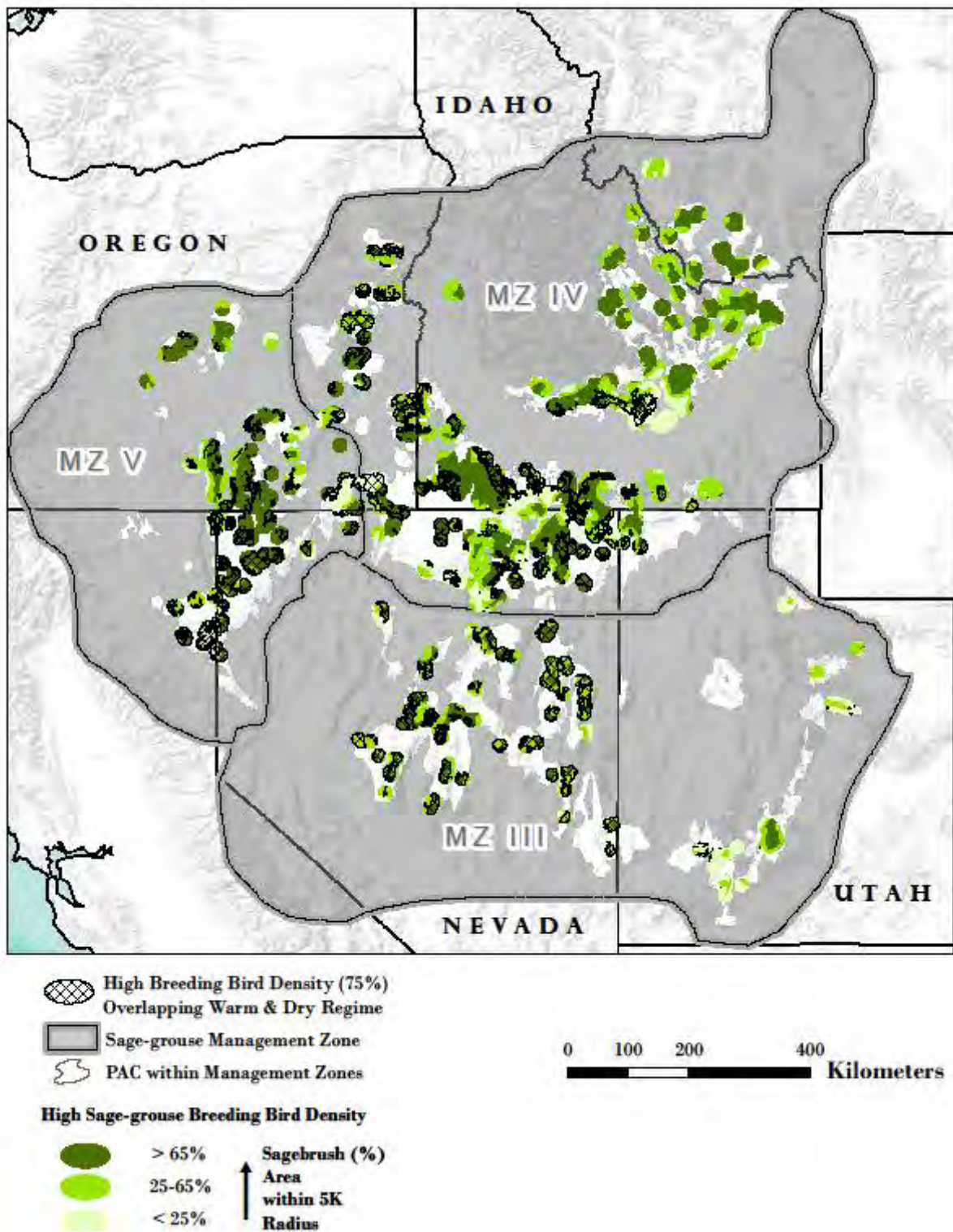


Figure 4, Soil Moisture and Temperature Regimes for Management Zones III, IV, and V



**Figure 5, Intersection of High Density (75% BBD) Populations.** The warm and dry sites and the proportion of these habitats in the three sagebrush landscape cover classes by management zone, and PACs within the Great Basin.

### Sagebrush Landscape Cover

The amount of the landscape in sagebrush cover is closely related to the probability of maintaining active sage-grouse leks, and is used as one of the primary indicators of sage-grouse habitat potential at landscape scales (Aldridge et al. 2008; Wisdom et al. 2011; Knick et al. 2013). For purposes of prioritizing landscapes for sage-grouse habitat management, FIAT used less than or equal to 25 percent sagebrush landscape cover as a level below which there is a low probability of maintaining sage-grouse leks, and greater than or equal to 65 percent as the level above which there is a high probability of sustaining sage-grouse populations with further increases of landscape cover of sagebrush (Aldridge et al. 2008; Wisdom et al. 2011; Knick et al. 2013). Increases in landscape cover of sagebrush have a constant positive relationship with sage-grouse lek probability at between about 25 percent and 65 percent landscape sagebrush cover (Knick et al. 2013). It is important to note that these data and interpretations relate only to persistence (i.e., whether or not a lek remains active), and it is likely that higher proportions of sagebrush cover may be required for population growth.

For the purposes of delineating sagebrush habitat relative to sage-grouse requirements for landscape cover of sagebrush, FIAT calculated the percentage of landscape sagebrush cover (Landfire 2013) within a 3-mile (5-kilometer) radius of each 98-foot by 98-foot (30 meter by 30 meter) pixel in Management Zones III, IV, and V (see Appendix 2 in Chambers et al. (*In prep.*) for how landscape sagebrush cover was calculated). FIAT then grouped the percentage of landscape sagebrush cover into each of the selected categories (0 to 25 percent, 25 to 65 percent, 65 to 100 percent; **Figure 6**, Sagebrush Landscape Cover and Fire Perimeters for the Analysis Area). Landfire data was based on 2000 satellite imagery so wildfire perimeters after that date were incorporated into this layer to better reflect landscape sagebrush cover. Burned areas were assumed to fall into the 0 to 25 percent landscape cover class.

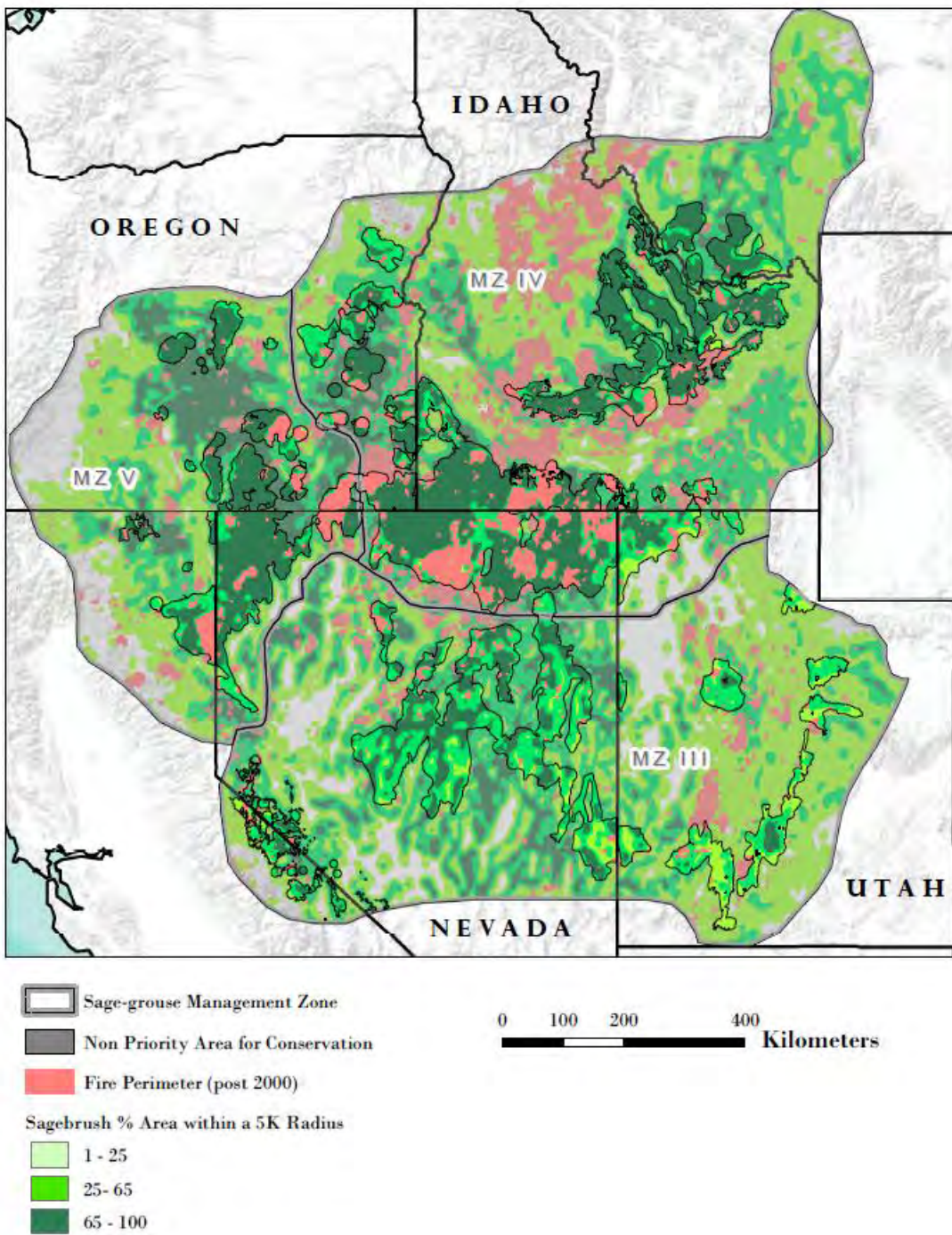


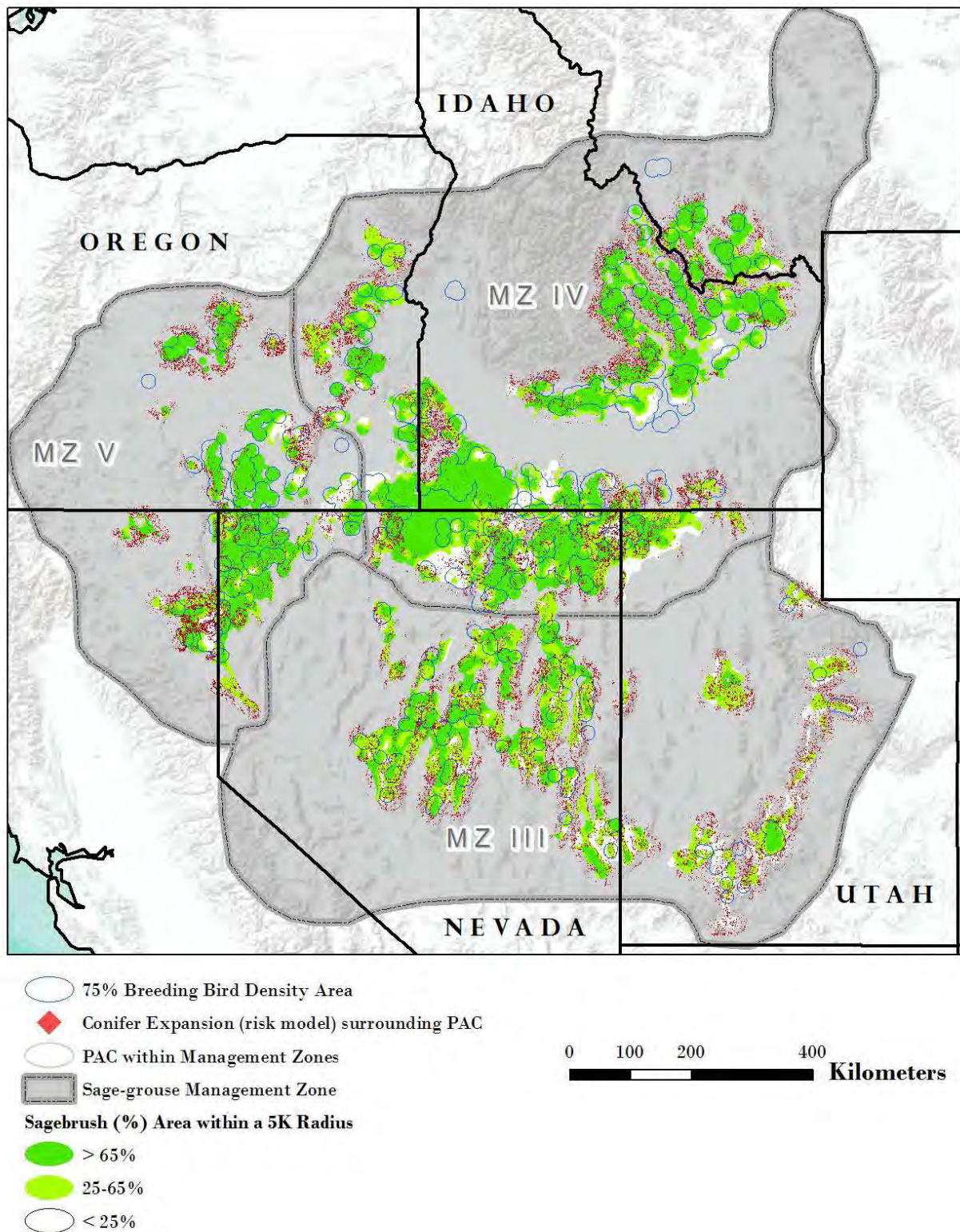
Figure 6, Sagebrush Landscape Cover and Fire Perimeters (post-2000) for the Analysis Area



### Conifer Expansion

Conifer expansion into sagebrush landscapes also directly reduces sage-grouse habitat by displacing shrubs and herbaceous understory as well as by providing perches for avian predators. Conifer expansion also leads to larger, more severe fires in sagebrush systems by increasing woody fuel loads (Miller 2013). Sage-grouse populations have been shown to be impacted by even low levels of conifer expansion (Baruch-Mordo et al. 2013). Active sage-grouse leks persist in regions of relatively low conifer woodland and are threatened by conifer expansion (Baruch-Mordo et al. 2013; Knick et al. 2013).

To estimate where sage-grouse breeding habitat faces the largest threat of conifer expansion, FIAT used a risk model developed by Manier et al. (2013) that locates regions where sagebrush landscapes occur within 250 meters of conifer woodland (**Figure 7**, Modeled Conifer Expansion for PACs with Greater Than 25% Sagebrush Landscape Cover In and Around 75% BBD). Although the model is coarse, it is available for the entirety of the three sage-grouse management zones analyzed. FIAT encourages using more accurate conifer expansion data in Step 2.



**Figure 7, Modeled Conifer Expansion for PACs with Greater Than 25% Sagebrush Landscape Cover In and Around 75% BBD**

## Step 1a. Identifying PACs and focal habitats

A primary goal for the conservation of sage-grouse populations is the identification of important habitats needed to ensure the persistence and recovery of the species. Loss of habitat, and by inference populations, in these habitats would likely imperil the species in the Great Basin. The first objective is to protect and restore those habitats that provide assurances for retaining large well connected populations.

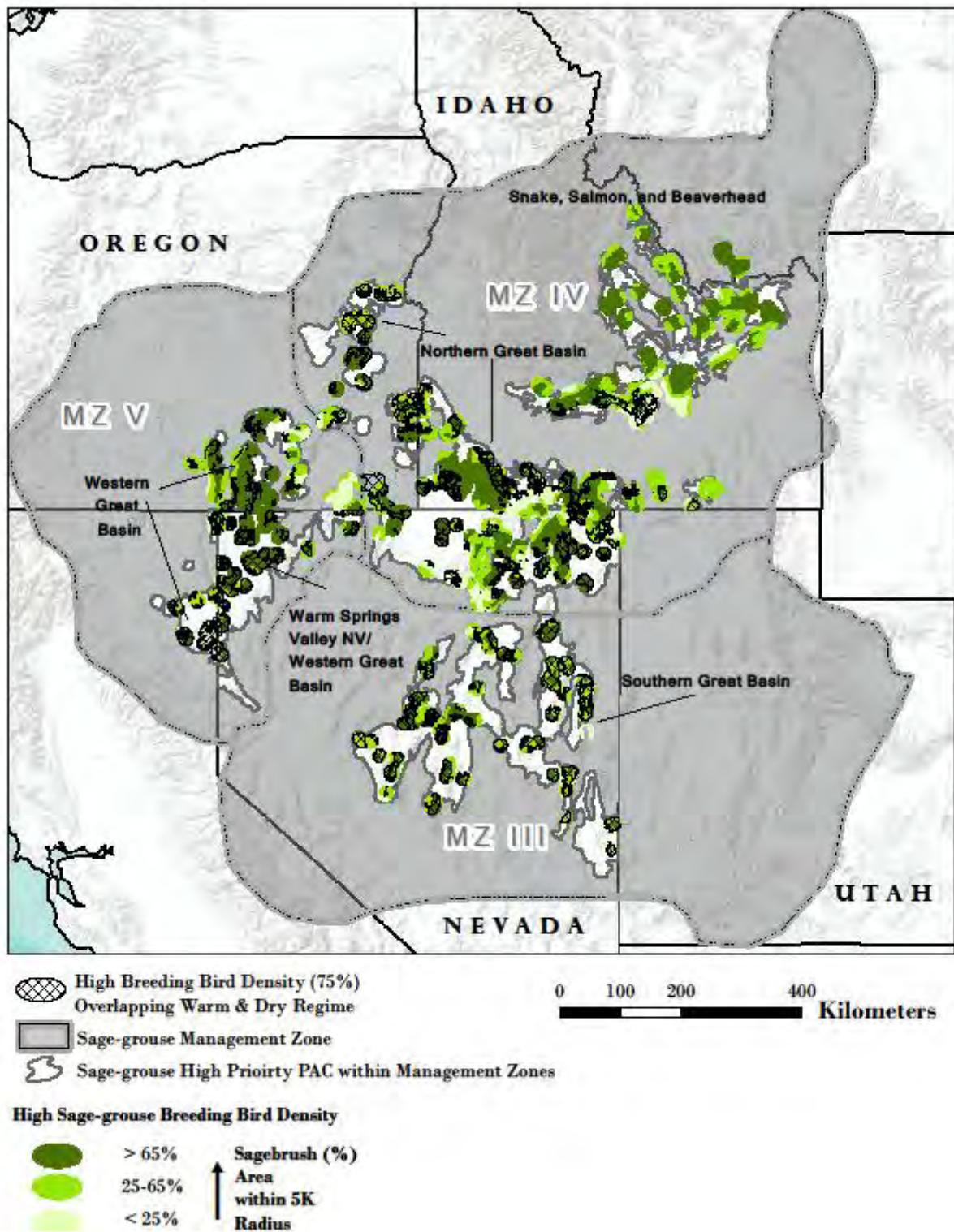
PACs and the 75 percent BBD maps were used to provide a first-tier stratification (e.g., focal habitats) for prioritizing areas where conservation actions could be especially important for sage-grouse populations. Although these areas are a subset of the larger sage-grouse habitats, they are readily identifiable and include habitats (e.g., breeding and nesting habitats that are considered critical for survival; Connelly et al. 2000; Holloran et al. 2005; Connelly et al. 2011) and necessary for the recovery of the species across its range.

The prioritization of habitats for conservation purposes was based on the several primary threats to remaining sage-grouse populations in the Great Basin including the loss of sagebrush habitats to wildfire and invasive annual grasses, and conifer expansion. The first, and probably the most urgent threat for sage-grouse, is the loss of sagebrush habitat due to wildfire and invasive annual species (e.g., cheatgrass; See Figure 11 in Chambers et al. [*In prep.*]). Areas of highest concern are those with low resistance to cheatgrass and low resilience after disturbance (warm/dry and some cool/dry temperature and moisture regimes sites) that are either **within or in close proximity** to remaining high density populations of sage-grouse (Figure 5). Sagebrush habitats (greater than 25 percent sagebrush landscape cover) prone to conifer expansion, particularly pinyon pine and/or juniper, are also a management concern when within or adjacent to high density sage-grouse populations (Figure 7).

Because these two threats occur primarily at different points along an elevational gradient and are associated with different soil temperature and moisture regimes, separate approaches are used to select PACs and focal habitats for each.

### **High Density Populations at Highest Risk from Wildfire and Invasive Annual Grasses**

PACs in Management Zones III, IV, and V. were evaluated on the basis of high density (75 percent) BBDs, sagebrush landscape cover, and soil temperature and moisture regimes to identify initial PACs that are a priority for assessments and associated focal habitats. **Figure 8**, High Priority PACs with High Density Sage-Grouse Populations (75% BBD), displays the results of the analysis focusing on the intersection of high density (75 percent BBD) populations, the warm and dry sites, and the proportion of these habitats in the three sagebrush landscape cover classes by management zone, and PACs within the Great Basin. **Table 1**, Relative Ranking of PACs Based on High Density (75% BBD) Populations, Warm/ Dry Sites, and Percentage of Habitat in Sagebrush Landscape Cover Classes, displays quantitative outputs of this analysis. The table allows a comparison of these data, and assists in selecting five PACs that provide the greatest contribution to high density sage-grouse populations, and the amounts (acres and proportion) within those PACs of sagebrush cover classes associated with warm and dry soil temperature and moisture regimes.



**Figure 8, High Priority PACs with High Density Sage-Grouse Populations (75% BBD) sagebrush landscape cover classes, and areas with low resistance and resilience relative to wildfires and invasive annual species.**

**Table 1, Relative Ranking of PACs Based on High Density (75% BBD) Populations, Warm/ Dry Sites, and Percentage of Habitat in Sagebrush Landscape Cover Classes**

Sage-grouse Management Zone	Sage-grouse Priority Area for Conservation (PAC) Name	Total PAC Acres	Breeding Bird Density (75%) Acres	Percent of Breeding Bird Density (75%) Area within PAC	Warm and Dry Soil Moisture & Temperature Regime within Breeding Bird Density (75%) Acres*		
					0-25% Sagebrush Landscape Cover	25%-65% Sagebrush Landscape Cover	65%+ Sagebrush Landscape Cover
4	Northern Great Basin	13045515	7383442	57%	179551 (2%)	674554 (9%)	1745163 (24%)
3	Southern Great Basin	9461355	3146056	33%	42596 (1%)	792780 (25%)	1062091 (34%)
4	Snake, Salmon, and Beaverhead	5477014	2823205	52%	68107 (2%)	89146 (3%)	95970 (3%)
5	Western Great Basin	3177253	2084626	66%	149399 (7%)	140141 (7%)	202767 (10%)
5	Warm Springs Valley NV/Western Great Basin	3520937	1558166	44%	31458 (2%)	207365 (13%)	741353 (48%)
4	SW Montana	1369076	659475	48%	0 (0%)	0 (0%)	0 (0%)
4	Northern Great Basin/Western Great Basin	1065124	624581	59%	114222 (18%)	85258 (14%)	116513 (19%)
5	Central OR	813699	451755	56%	0 (0%)	6211 (1%)	16463 (4%)
3	Panguitch/Bald Hills	1135785	352258	31%	6883 (2%)	5821 (2%)	0 (0%)
3	Parker Mountain-Emery	1122491	308845	28%	0 (0%)	127 (0%)	0 (0%)
4	Box Elder	1519454	292658	19%	22 (0%)	43325 (15%)	23913 (8%)
4	Baker OR	336540	184813	55%	0 (0%)	46459 (25%)	36214 (20%)
3	NW-Interior NV	371557	108256	29%	576 (1%)	17117 (16%)	25173 (23%)
3	Carbon	355723	97734	27%	255 (0%)	180 (0%)	0 (0%)
3	Strawberry	323219	52635	16%	0 (0%)	0 (0%)	0 (0%)
3	Rich-Morgan-Summit	217033	37005	17%	0 (0%)	0 (0%)	0 (0%)
3	Hamlin Valley	341270	3244	1%	0 (0%)	139 (4%)	3105 (96%)
3	Ibapah	98574	0	0%	0 (NA)	0 (NA)	0 (NA)
3	Sheeprock Mountains	611374	0	0%	0 (NA)	0 (NA)	0 (NA)
5	Klamath OR/CA	162667	0	0%	0 (NA)	0 (NA)	0 (NA)

\* Numbers in parenthesis indicate the percent of acres relative to total acres of breeding bird density (75%)

These five PACs comprise 90 percent and 95 percent of remaining PAC sagebrush landscape cover in the 25 to 65 percent and greater than or equal to 65 percent sagebrush landscape cover classes, respectively, of the 75 percent BBD associated with low resistance/resilience habitats. The 75 percent BBD habitats in the Northern, Southern Great Basin, and Warm Spring PACs appear particularly important for two reasons. They represent a significant part of the remaining habitats for the Great Basin metapopulation, and they have the greatest amount of low resiliency habitat remaining that still functions as sage-grouse habitat.

An examination of the 5 selected PACs shows that the sum of the 75 percent BBD within these PACs is 16,995,496 acres (**Table 2**, PACs with the Highest Acres and Proportions of 75% BBD acres, and Acres and Proportions of 75% BBD Acres within the Warm/Dry Soil Temperature and Moisture Class). These are the **focal habitats**. These five PACs constitute 84 percent of the 75 percent BBD low resiliency habitats for all Management Zones III, IV, and V PACs. Within and immediately around these focal habitats, 5,751,293 acres are in high BBD areas with landscape sagebrush cover in the 25-65 percent and  $\geq 65$  percent classes and in the warm and dry soil temperature and moisture regimes. These are the habitats in the most danger to loss due to their low resistance to invasive annual grasses and low resilience following wildfire. Within the focal habitats in the high priority PACs, low resistance and resilience areas (cross-hatched areas in Figure 8) are a high priority (emphasis area) for implementing management strategies. Applying management strategies outside the emphasis areas are appropriate if the application of fire operations and fuels management activities will be more effective in addressing wildfire threats.

**Table 2, PACs with the Highest Acres and Proportions of 75% BBD acres, and Acres and Proportions of 75% BBD Acres within the Warm/Dry Soil Temperature and Moisture Class (see Figure 8)**

PAC	PAC Acres	Acres of 75% BBD in PAC ( <b>focal habitat</b> )	Proportion of 75% BBD within PACs	Warm & Dry Soils within 75% BBD by Sagebrush Landscape Cover Classes Greater Than 25%*	
				25-65%	>65%
Northern Great Basin	13,045,515	7,383,442	0.57	674,517(9%)	1,745,163(24%)
Southern Great Basin	9,461,355	3,146,056	0.33	792,780(25%)	1,062,091(34%)
Snake, Salmon, and Beaverhead	5,477,014	2,823,205	0.52	89,146(3%)	95,970(3%)
Warm Springs Valley NV/Western Great Basin	3,520,937	1,558,166	0.44	207,365(13%)	741,353(48%)
Western Great Basin	3,177,253	2,084,626	0.66	140,141(7%)	202,767(10%)
<b>Total for 5 PACS</b>	<b>34,682,074</b>	<b>16,995,496</b>	<b>0.49</b>	<b>1,903,949</b>	<b>3,847,344</b>

\* This category represents the emphasis areas for applying appropriate management strategies in or near the focal habitats due to the lower probability of recovery after disturbance and higher probability of invasive annual grasses and existing wildfire threats.

### High Density Sage-Grouse Habitats at Risk from Conifer Expansion

PACs, sagebrush landscape cover, and the 75 percent BBD data were also used in conjunction with the conifer expansion data (Mainer et al. 2013) to provide an initial stratification to determine PACs where conifer removal would benefit important sagebrush habitats. Conifer expansion threats are primarily western juniper in the northern Great Basin and pinyon pine/Utah juniper in the southern Great Basin.

Figure 7 displays results of the analysis focusing on the intersection of the 75 percent BBD, and modeled conifer expansion areas within two sagebrush landscape cover classes by management zone and PACs within the Great Basin. To identify high density sage-grouse areas affected by conifer expansion, the amount and proportion of acres estimated to be affected were calculated by sagebrush cover class to assist in the identification of the focal habitats (**Table 3**). **Table 4**, displays quantitative outputs of this analysis using the 25 to 65 percent and greater than 65 percent landscape sagebrush cover classes for the PACs. Thus, **focal habitats** for addressing conifer expansion are the areas within and near conifer expansion in sagebrush landscape cover classes of 25 to 65 percent and greater than 65 percent. Conifer expansion in these two sagebrush landscape cover classes in the 75 percent BBD areas constitutes an emphasis area for treatments to address conifer expansion. Landscapes with less than 25 percent sagebrush cover may require significant additional management actions to restore sagebrush on those landscapes and therefore were considered a lower priority for this analysis. Focal habitats are identified in Table 4 and displayed in **Figure 9**.

Table 3 assists in identifying those PACs that provide the greatest contribution to high density sage-grouse populations, and the amounts (acres and proportion) within those PACs of sagebrush cover classes associated with modelled conifer expansion areas. Although there are uncertainties associated with the model, the results help managers identify specific geographic areas where treatments in conifer (pinyon and/or juniper) could benefit existing important sage-grouse populations.

The results of the screening revealed 5 PACs that contribute substantially to the 75 percent BBD habitats and are currently impacted most by conifer expansion (primarily pinyon pine and/or juniper; Table 4 and Figure 9). Four of the five PACs identified as high priority for conifer expansion treatments were also high priorities for wildfires and invasive annual grass threats. This is likely due to the size of the PACs and the relative importance of these PACs for maintaining the Great Basin sage-grouse meta-populations. As expected, the locations of high density sage-grouse habitats affected by conifer expansion differ spatially from those associated with low resilience habitats within and among the PACs, primarily due to differences in the biophysical settings (e.g., elevation and rainfall) that contribute to threats from invasive annual grasses and wildfires.

Three PACs (Snake/Salmon/Beaverhead, Southwest Montana, and Northern Great Basin/Western Great Basin) ranked high due to their relatively large proportion of high density breeding habitats (Table 3), but were not selected since the threat of conifer expansion was relatively low. One PAC, (Snake/Salmon/Beaverhead, was identified as a potential high priority area but was dismissed because results of the conifer expansion model likely overestimated impacts due to the adjacent conifer forests in this region. The COT Report also identified conifers as a “threat present but localized” in these areas, whereas, the top five PACs prioritized all have conifers identified as a widespread priority threat to address (USFWS 2013).

**Table 3, Relative Ranking of PACs Based on High Density (75% BBD) Populations, Modeled Conifer Expansion, and Percentage of Habitats in Sagebrush Landscape Cover Classes**

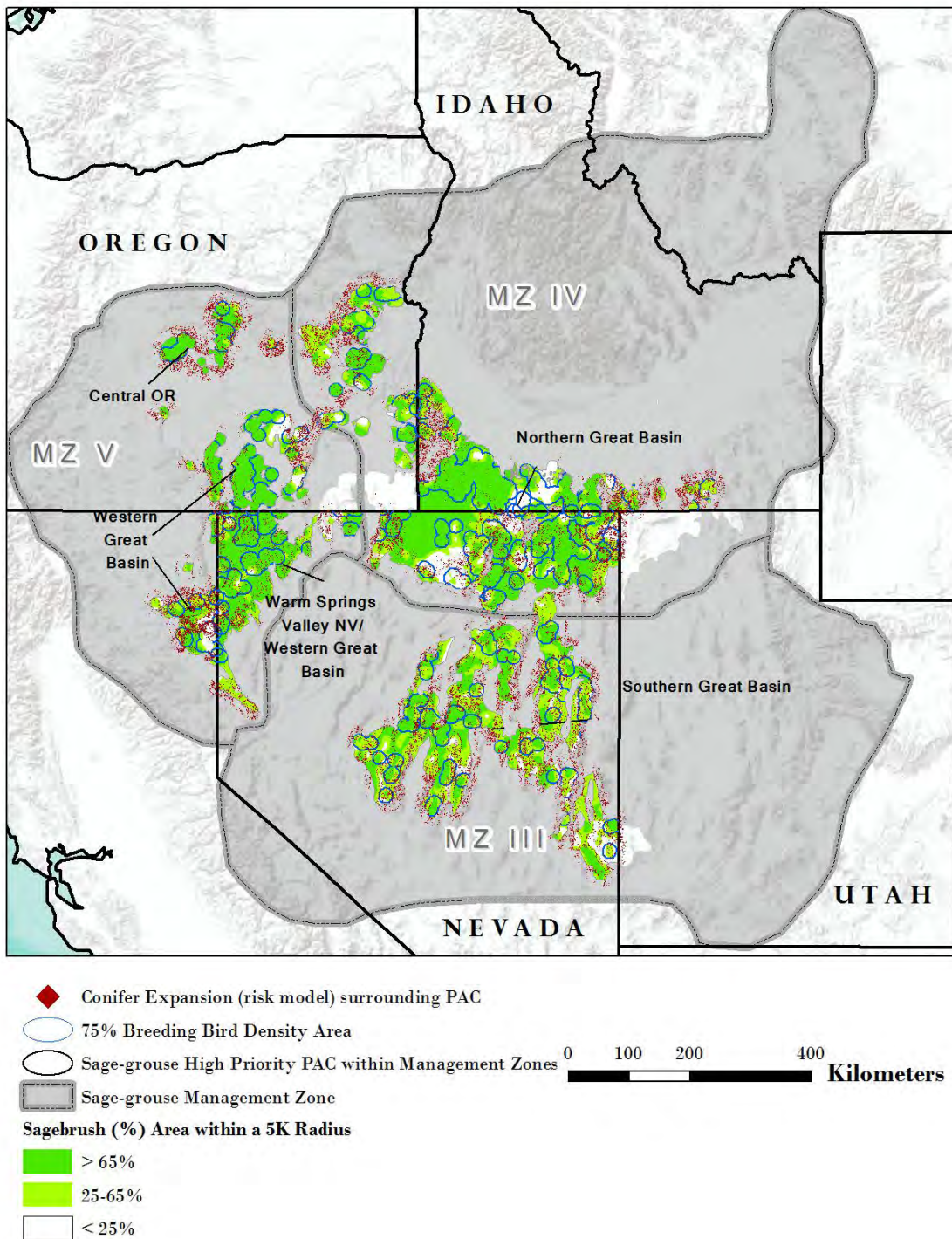
Sage-grouse Management Zone	Sage-grouse Priority Area for Conservation (PAC) Name	PAC acres	Breeding Bird Density (75%) Acres	Relative Proportion of Breeding Bird Density Area within PAC	Conifer Expansion (Modeled) Acres*		
					0-25% Sagebrush Landscape Cover	25%-65% Sagebrush Landscape Cover	65%+ Sagebrush Landscape Cover
4	Northern Great Basin	13045515	7383442	0.57	188502 (1%)	512949 (4%)	442480 (3%)
3	Southern Great Basin	9461355	3146056	0.33	108657 (1%)	738624 (8%)	237828 (3%)
4	Snake, Salmon, and Beaverhead	5477014	2823205	0.52	4209 (0%)	92173 (2%)	216803 (4%)
5	Western Great Basin	3177253	2084626	0.66	87963 (3%)	184618 (6%)	126177 (4%)
5	Warm Springs Valley NV/Western Great B	3520937	1558166	0.44	37148 (1%)	107025 (3%)	217101 (6%)
4	SW Montana	1369076	659475	0.48	1428 (0%)	34765 (3%)	39215 (3%)
4	Northern Great Basin/Western Great Bas	1065124	624581	0.59	12101 (1%)	2247 (0%)	6161 (1%)
5	Central OR	813699	451755	0.56	3191 (0%)	44937 (6%)	59624 (7%)
3	Panguitch/Bald Hills	1135785	352258	0.31	89141 (8%)	75157 (7%)	2563 (0%)
3	Parker Mountain-Emery	1122491	308845	0.28	84719 (8%)	83441 (7%)	7469 (1%)
4	Box Elder	1519454	292658	0.19	8531 (1%)	114376 (8%)	57645 (4%)
4	Baker OR	336540	184813	0.55	945 (0%)	15263 (5%)	195 (0%)
3	NW-Interior NV	371557	108256	0.29	7929 (2%)	29440 (8%)	11813 (3%)
3	Carbon	355723	97734	0.27	15968 (4%)	34446 (10%)	283 (0%)
3	Strawberry	323219	52635	0.16	7916 (2%)	27340 (8%)	1075 (0%)
3	Rich-Morgan-Summit	217033	37005	0.17	11685 (5%)	14280 (7%)	238 (0%)
3	Hamlin Valley	341270	3244	0.01	11321 (3%)	29960 (9%)	6243 (2%)
3	Ibapah	98574	0	0.00	195 (0%)	6770 (7%)	1039 (1%)
5	Klamath OR/CA	162667	0	0.00	1 (0%)	1533 (1%)	15302 (9%)
3	Sheeprock Mountains	611374	0	0.00	16744 (3%)	78580 (13%)	11878 (2%)

\* Numbers in parenthesis indicate the proportion of acres relative to total PAC acres



**Table 4, PACS with the Highest Acres and Proportions of 75% BBD acres and Estimated Conifer Expansion within Sagebrush Landscape Cover Classes (25-65 percent and ≥65 percent; see Figure 9)**

PAC	PAC Acres	Acres 75% BBD in PAC	Prop. 75% BBD within PACs	Conifer Expansion by Landscape Sagebrush Cover Classes 25-65% and ≥65%* Focal Habitat	
				25-65%	≥65%
Northern Great Basin	13,045,515	7,383,442	0.57	512,949 (4%)	442,480 (3%)
Southern Great Basin	9,461,355	3,146,056	0.33	738,624 (8%)	237,828 (3%)
Warm Springs Valley NV/Western Great Basin	3,520,937	1,558,166	0.44	107,025 (3%)	217,101 (6%)
Western Great Basin	3,177,253	2,084,626	0.66	184,618 (6%)	126,177 (4%)
Central Oregon	813,699	451,755	0.56	44,937 (6%)	59,624 (7%)
<b>Total for 5 PACS</b>	<b>30,018,759</b>	<b>14,624,045</b>	<b>0.49</b>	<b>1,588,153 (5%)</b>	<b>1,083,210 (4%)</b>
*Numbers in parenthesis represent the percent of total PAC acres for each class.					



**Figure 9, Five PACs Significantly Impacted by Conifer Expansion** that contribute substantially to the 75% BBD and that have sagebrush landscape cover greater than 25%.

While the coarse-scale conifer expansion data used in this analysis likely over estimates the extent of the pinyon pine and/or juniper threat, results suggest that far fewer acres are currently affected by conifers than might be at risk from fire and invasive annual grasses impacts. Conifer expansion into sage-grouse habitats occurs at a slower rate, allowing more time for treatment, but early action may be needed to prevent population level impacts on sage-grouse (Baruch-Mordo et al. 2013). Furthermore, conifer expansion is primarily occurring on cooler and moister sites that are more resilient and where restoration is more likely to be effective (Miller et al. 2011), providing managers the opportunity to potentially offset at least some habitat loss expected to continue in less resilient ecosystems. While the available data set used to estimate conifer expansion provides only a coarse assessment of the problem, considerable efforts are currently underway to map conifers across sage-grouse range. These maps are expected to be available in the near future and should be used by land managers to better target project level conifer removal.

FIAT cautions against using the plotted locations of estimated conifer expansion for local management decisions due to the coarse-scale nature of this range-wide data set. Conifer expansion estimates are primarily provided here to aid in judging the relative scope of the threat in each PAC.

## Step 1b. Potential Management Strategies

Potential management **strategies** (e.g., fuels management, habitat recovery/restoration, fire operations, post-fire rehabilitation) to conserve or restore Step 1 focal habitats are described below to assist local management units to initiate Step 2. These examples are illustrative and do not contain the full range of management strategies that may be required to address wildfires, invasive annual grasses, and conifer expansion within PACs and associated focal habitats. In general, the priority for applying management strategies is to first maintain or conserve intact habitat and second to strategically restore habitat (after a wildfire or proactively to reconnect habitat). Management strategies will differ when applying the protocol to:

**Wildfire and Invasive Annual Grass.** (See PACs identified in Table 2 and focal habitats shown in Figure 8). Focal habitats, as they relate to wildfires and invasive annual grasses, are defined as sage-grouse habitat in priority PACs within 75 percent BBD. Within these focal habitats, sagebrush communities with low resilience to disturbance and resistance to invasive annual grasses (warm and dry soil temperature and moisture regimes) are an emphasis area for management actions. Appendix 5 (A) in Chambers et al. (*In prep.*) includes a generalized state and transition model with an invasive annual grass component and warm and dry soil temperature and moisture regime associated with 8 to 12 inches of annual precipitation. This state and transition models is useful in developing management strategies to deal with annual grass issues as it contains useful restoration pathways.

Burn Probability is another tool that can be used to assist managers to identify the relative likelihood of large fire occurrence across the landscape within PACs and focal habitats. Burn probability raster data were generated by the Missoula Fire Lab using the large fire simulator - FSim - developed for use in the national Interagency [Fire Program Analysis \(FPA\)](#) project. FSim uses historical weather data and LANDFIRE fuel model data to simulate fires burning. Using these simulated fires, an overall burn probability is returned by FSim for each 270m pixel. The burn probability data was overlaid spatially with PACs, soil data, and shrub cover data. The majority of the high and very high burn probability acres lie within the top 5 PACs and are within areas with >25% sagebrush cover. Several of the other PACs have a greater overall percentage of the warm/dry soil regime with high/very high burn probability (northern great basin, baker, and NW interior NV) but the total acres are relatively few. Areas identified with high and very high burn probability are most likely to experience large fires given fire history, fuels, weather and topography. Results are displayed in the table 5 and Figure 10.

**Table 5, Percentages of sage-grouse PAC areas with high and very high burn probability, 75% BBD within PAC, 75% BBD and warm dry/temperature regime, and 75% BBD and warm dry/temperature and warm dry/temperature with high and very high burn probability.**

<b>Sage Grouse Management Zone</b>	<b>Sage-grouse Priority Area for Conservation (PAC) Name</b>	<b>Total PAC Acres</b>	<b>High, very high burn probability (percent of PAC acres)</b>	<b>75% BBD within PAC (percent PAC acres)</b>	<b>75% BBD and warm and dry soil/temperature regime acres (percent PAC acres)</b>	<b>75% BBD and warm and dry soil/temperature regime with high, very high burn probability (percent PAC acres)</b>
4	Northern Great basin	13,045,415	86%	57%	19%	17%
3	Southern Great Basin	9,461,355	48%	33%	20%	9%
4	Snake, Salmon, and Beaverhead	5,477,014	68%	52%	5%	4%
5	Western Great Basin	3,177,253	61%	66%	15%	12%
5	Warm Springs Valley /Western Great Basin	3,520,937	30%	44%	28%	9%
4	SW Montana	1,369,076	1%	48%	0%	0%
4	Northern Great Basin/Western Great Basin	1,065,124	82%	59%	30%	22%
5	Central Oregon	813,699	71%	56%	3%	2%
3	Panguitch/Bald Hills	1,135,785	70%	31%	1%	1%
3	Parker Mountain-Emery	1,122,491	28%	28%	0%	0%
4	Box Elder	1,519,454	61%	19%	4%	2%
4	Baker Oregon	336,540	74%	55%	25%	21%
3	NW-Interior NV	371,557	99%	29%	12%	11%
3	Carbon	355,723	22%	27%	0%	0%
3	Strawberry	323,219	26%	16%	0%	0%
3	Rich-Morgan-Summit	217,033	79%	17%	0%	0%
3	Hamlin Valley	341,270	60%	1%	1%	0%
3	Ibapah	98,574	0%	0%	0%	0%
3	Sheeprock Mountains	611,374	98%	0%	0%	0%
5	Klamath OR/CA	162,667	98%	0%	0%	0%

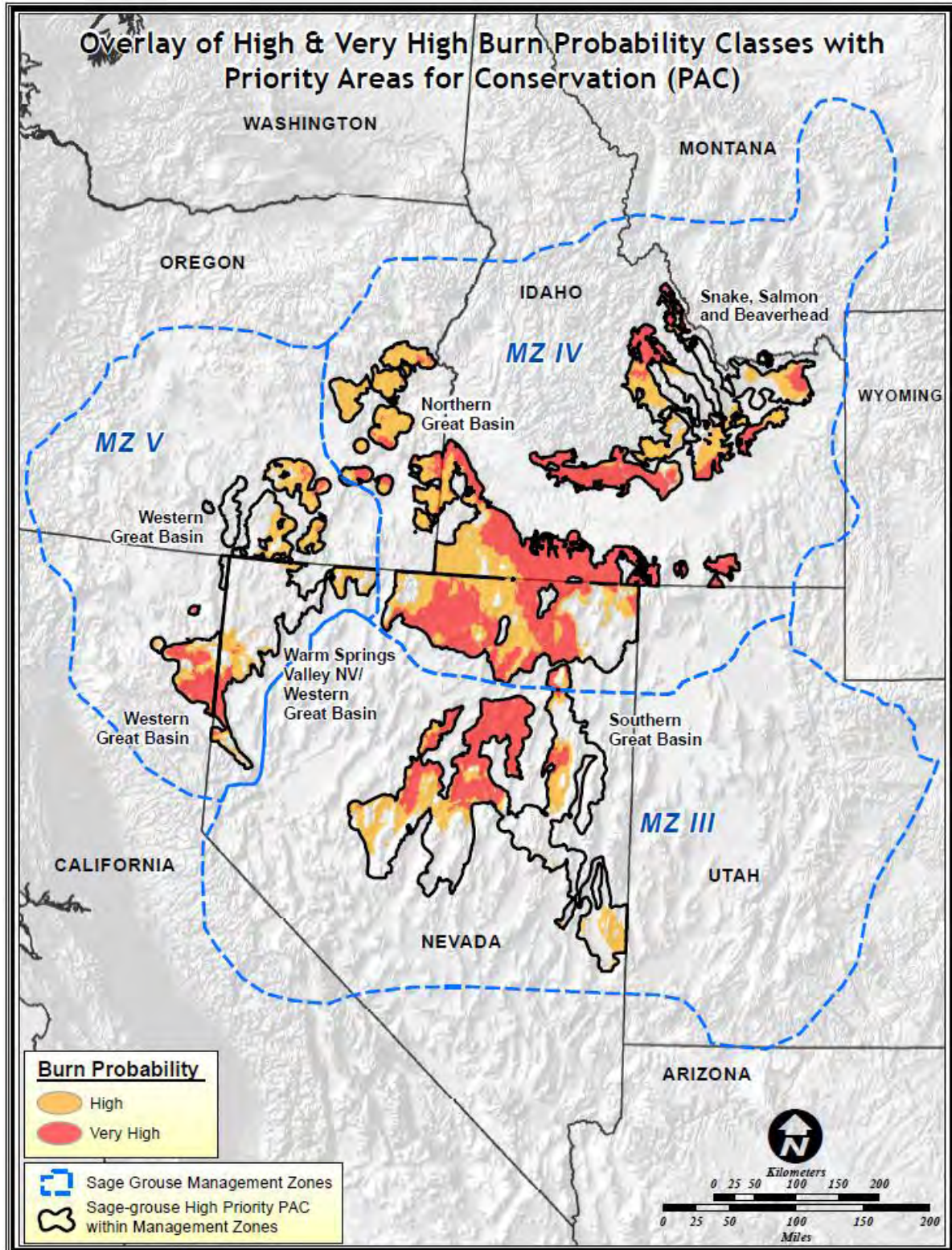


Figure 10, Burn Probability (high and very high) in priority invasive annual grass and wildfire PACs.

**Conifer Expansion.** (See priority PACs for assessment identified in Table 4 and focal habitats shown in Figure 9). Focal habitats, as they relate to conifer expansion, are defined as sage-grouse habitat in a priority PAC with sagebrush landscape cover between 25 and 100 percent that is either near or in a conifer expansion area. The relationship between conifer expansion and resilience to disturbance and resistance to expansion is not documented to the same degree as with invasive annual grasses. However, Appendix 5 (D. and E.) in Chambers et al. (*In prep.*) includes two generalized state and transition models for conifer expansion with warm to cool and soil temperature regimes associated with precipitation ranges from 12 to 14 or more inches of annual precipitation. These state and transition models are useful in developing management strategies to deal with conifer expansion as they contain useful restoration pathways.

Chambers et al. (*In prep.*) is recommended for review at this point for information on applying resistance and resilience concepts along with sage-grouse habitat characteristics to develop management strategies to address wildfires, invasive annual grasses, and conifer expansion. The following tables are recommended for use in developing management strategies in or near focal habitats:

Table 1. Soil temperature and moisture regimes relationship to vegetation types and resistance and resilience.

Table 2. Sage-grouse habitat matrix showing the relationship between landscape sagebrush cover and resistance and resilience.

Table 3. Potential management strategies based on sage-grouse habitat requirements and resistance and resilience.

Table 4. Management strategies (fire suppression, fuels management, post-fire rehabilitation, and habitat restoration) associated with each cell in the sage-grouse habitat matrix (Table 2).

The “Putting it all together” section of the Chambers et al. (*In prep.*) also contains a case study from Northeast Nevada illustrating applications of management strategies to address the conservation, protection, and restoration of sage-grouse habitat.

To further assist in understanding Step 1b, examples of general priorities for management strategies are provided below and illustrated in Appendix 3 and 4:

1. Fuels Management: Projects that are designed to change vegetation composition and/or structure to modify potential fire behavior for the purpose of improving fire suppression effectiveness and limiting fire spread and intensity.
  - a. Identify priorities and potential measures to reduce the threats to sage-grouse habitat resulting from changes in invasive annual grasses (primary focus on exotic annual grasses and conifer encroachment) and wildland fires. Place high priority on areas dominated by invasive annual grasses that are near or adjacent to low resistance and resilience habitats that are still intact.

- b. Areas on or near perimeter of successful post-fire rehabilitation and habitat restoration projects where threats of subsequent fire are present are important for consideration.
  - c. Fuels management can be a high priority in large tracts of intact sagebrush if impacts on sage-grouse populations are minimal and outweighed by the potential benefits of reduced wildfire impacts in area being protected.
  
- 2. Habitat Recovery/Restoration Recovery (passive restoration) is a high priority in intact sagebrush stands to improve resistance and resilience before a disturbance. For example, where understory perennial herbaceous species are limited, improved livestock grazing practices can increase the abundance of these species and promote increased resistance to annual grasses.
  - a. Habitat restoration is important where habitat connectivity issues are present within focal habitats.
  - b. Pinyon pine and/or juniper removal in Phase I and II stands adjacent to large, contiguous areas of sagebrush (greater than 25 percent sagebrush landscape cover) is a priority.
  
- 3. Fire Operations (includes preparedness, prevention and suppression activities).
  - a. Higher priority should be placed on areas with greater than 65 percent cover than on areas with 25 to 65 percent cover, followed by 0 to 25 percent cover (these categories are continuums not discrete thresholds).
  - b. Higher priority should be placed on lower resistance/resilience habitats compared with higher resistance/resilience habitats.
  - c. Fire operations in areas restored or post-fire rehabilitation treatment where subsequent wildfires can have detrimental effect on investment and recovery of habitat are important for consideration.
  - d. Fire operations (suppression) are especially important in low elevation winter sagebrush habitat with low resistance and resiliency.
  
- 4. Post-Fire Rehabilitation
  - a. High priority should be placed on supporting short-term natural recovery and long-term persistence in higher resistance and resiliency habitats (with appropriate management applied).
  - b. High priority should be placed on reseeding in moderate to low resistance and resiliency habitats, but only if competition from invasive annual grasses, if present, can be controlled prior to seeding.

## Step 2

Step 2 is carried out by local management units using the Step 1 geospatial data, focal habitats, and the associated management strategies. Step 2 includes evaluating the availability and accuracy of local information and geospatial data used to develop local management strategies in or near focal habitats (Step 2a).



It also involves developing focal habitat activity/implementation plans that include prioritized management tactics and treatments to implement effective fuels management, habitat recovery/restoration, fire operations, and post-fire rehabilitation (Step 2b). These activity/implementation plans will serve as the basis for NEPA analysis of site-specific projects.

## **Step 2a- Review of Step 1 Data and Incorporation of Local Information**

Evaluate the accuracy and utility of Step 1 geospatial layers for focal habitats by incorporating more accurate or locally relevant:

- Vegetation maps (especially sagebrush cover)
- Updated or higher resolution conifer expansion layers (if applicable)
- Soil survey and ecological site descriptions
- Weather station, including Remote Automatic Weather Stations, data
- PACs, focal habitats, winter habitats, sage-grouse population distributions (i.e., more recent BBD surveys)
- Maps of cheatgrass and other invasive annual grasses that degrade sage-grouse habitat
- Wildfire polygons including perimeters and unburned islands within burn polygons
- Treatment locations and success (consult US Geological Survey Land Treatment Digital Library at <http://ltdl.wr.usgs.gov/>). The Land Treatment Digital Library allows the user to search on treatment results on an ecological site basis.
- Models and tools to help inform management strategies. For example, data which characterizes wildfire potential can help identify risk to focal habitats and help plan fire suppression and fuels management strategies to address these risks.
- Rapid Ecoregional Assessments
- Land Use Plans
- Appropriate monitoring or inventory information
- Any other geospatial data or models that could improve the accuracy of the assessment process

It is essential that subregional or local information and geospatial data be subjected to a quality control assessment to ensure that it is appropriate to use in developing Step 2b activity and implementation plans. Since PACs and focal habitats usually transcend multiple administrative boundaries, a collaborative approach is highly recommended for Step 2a.

A series of questions tied to the management strategies described in the Introduction section follows to assist managers in developing the framework to complete Step 2b (development of activity/implementation plans). The questions that follow apply to the focal habitats (and buffer areas around focal areas where management strategies may be more effectively applied) and will help in developing coordinated implementation/activity plans. These questions should not limit the scope of the assessment and additional questions relative to local situations are encouraged. These questions portray the minimum degree of specificity for focal habitats in order for offices to complete Step 2a.

### Fuels Management

1. Where are the priority fuels management areas (spatially defined treatment opportunity areas that consider fire risk, fuels conditions, and focal habitats [including areas adjacent to focal habitats])?
2. Based on fire risk to focal habitats, what types of fuels treatments should be implemented to reduce this threat (for example, linear features that can be used as anchors during suppression operations)?
3. Considering resistance/resilience concepts and the landscape context from Step 1, where should treatments be applied in and around focal habitats to:
  - a. Constrain fire spread?
  - b. Reduce the extent of conifer expansion?
  - c. Augment future suppression efforts by creating fuel breaks or anchors for suppression?
4. Based on opportunities for fire to improve/restore focal habitats, what types of fuels treatments should be implemented to compliment managed wildfire by modifying fire behavior and effects?
5. Are there opportunities to utilize a coordinated fuels management approach across jurisdictional boundaries?
6. What fuel reduction techniques will be most effective that are within acceptable impact ranges of local sage-grouse populations, including but not limited to grazing, prescribed fire, chemical, and biological and mechanical treatments? Will combinations of these techniques improve effectiveness (e.g., using livestock to graze fine fuels in a mowed fuel break in sagebrush)?

### Habitat Recovery/Restoration

1. Are there opportunities for habitat restoration treatments to protect, enhance or maintain sage-grouse focal habitat especially to restore connectivity of focal area habitat?
2. Considering the resistance and resilience GIS data layer (Figure 4) and the Sage-Grouse Habitat Matrix (Chambers et al. *In prep.*; Table 2), where and why would passive or active restoration treatments be used?
3. What are the risks and opportunities of restoring habitat with low resistance and resilience including the warm/dry and cool/dry soil moisture/temperature regime areas?
4. Are there opportunities to utilize a coordinated approach across jurisdictional boundaries to effectively complete habitat restoration in focal habitats?

### Fire Operations

1. Where are priority fire management areas (spatially defined polygons having the highest need for preparedness and suppression action)?

2. Where are the greatest wildfire risks to focal habitats considering trends in fire occurrence and fuel conditions (see Figure 10)?
3. Where do opportunities exist that could enhance or improve suppression capability in and around focal habitats?
  - a) For example, increased water availability through installation of helicopter refill wells or water storage tanks.
  - b) Decreased response time through pre-positioned resources or staffing remote stations.
4. Should wildfire be managed (per land use plan objectives) for improving focal habitat (e.g., reducing conifer expansion), and if so where, and under what conditions?
5. How can fire management be coordinated across jurisdictional boundaries to reduce risk or to improve focal habitats?

### **Post-fire Rehabilitation**

1. Where are areas that are a high priority for post-fire rehabilitation to improve habitat connectivity if a wildfire occurs?
2. Which areas are more conducive (higher resistance and/or resilience) to recovery and may not need reseeding after a wildfire?
3. What opportunities to build in fire resistant fuel breaks to reduce the likelihood of future wildfires impacts on seeded or recovering areas?
4. Are there opportunities to utilize a coordinated approach across jurisdictional boundaries to implement rehabilitation practices?

The outcome of Step 2a is the assembly of the pertinent information and GIS layers to assist managers in developing implementation or activity plans to address wildfires, invasive annual grasses, and conifer expansion in focal habitats. Activity plans generally refer to plans where management of a resource is changed (livestock grazing plans) whereas implementation plans are generally associated with treatments.

### **Step 2b- Preparation of Activity/Implementation Plans**

Activity/implementation plans are prepared to implement the appropriate management strategies within and adjacent to focal habitats. Since focal habitats cross jurisdictional boundaries, it is especially important that a collaborative approach be used to develop implementation/activity plans. The process of identifying partners and creating collaborative teams to develop these plans is a function of state, regional, and local managers and is not addressed as part of this step.

Implementation/activity plans are required to:

1. Address issues in and around focal habitats related to wildfires, invasive annual grasses, and conifer expansion

2. Use resistance to invasive annual grasses and resilience after disturbance (where appropriate) as part of the selection process for implementing management strategies
3. Emphasize application of management strategies within or near focal habitats with low resistance and resilience (warm/dry and cool/dry soil moisture/temperature regimes) invasive annual grasses and wildfires
4. Use the best available local information to inform the assessment process
5. Encourage collaboration and coordination with focal habitats across jurisdictional boundaries
6. Be adaptive to changing conditions, disturbances, and modifications of PAC boundaries

FIAT recommends considering other factors, such as adaptive management for climate change, local sagebrush mortality due to aroga moth or other pests, and cheatgrass die-off areas in developing activity/implementation plans. The latter two factors could influence where and what kind of management strategies may be needed to address the loss of habitat or changes in fuel characteristics (e.g., load and flammability) associated with these mortality events.

The following recommendations are provided to assist in the preparation of activity/implementation plans:

### **Fuels Management**

1. Spatially delineate priority areas for fuel management treatments per Step 2a information considering:
  - a. Linear fuel breaks along roads
  - b. Other linear fuel breaks to create anchor points
  - c. Prescribed burning which would meet objectives identified in the Fish and Wildlife Service's Conservation Objectives Team (COT) report
  - d. Mechanical (e.g., treatment of conifer expansion into sagebrush communities)
  - e. Other mechanical, biological, or chemical treatments
  - f. If they exist, spatially delineated areas where fuel treatments would increase the ability to use fire to improve/enhance focal habitats.
2. Identify coordination needed between renewable resource, fire management, and fuels management staff to facilitate planning and implementation of fuels treatments.
3. Quantify a projected level of treatment within or near focal habitats.
  - a. Identify treatments (projects) to be planned within or near focal habitats.
  - b. Include a priority and proposed work plan for proposed treatments.

### **Habitat Recovery/Restoration**

1. Spatially delineate priority areas for restoration, using criteria established in Step 2a. Priority areas for restoration should be delineated by treatment methods:
  - a. Seeding priority areas
  - b. Invasive annual grasses priority treatment areas (herbicide, mechanical, biological, combination)

- c. Priority areas requiring combinations of treatments (e.g., herbicide followed by seeding).
  - d. Include tables, maps or appropriate info.
2. Identify coordination needed between renewable resource, fire management, and fuels management staff to facilitate planning and implementation of restoration treatments.
3. Include a priority or implementation schedule for proposed restoration treatment

### **Fire Operations**

1. Spatially delineate priority areas for fire suppression, based upon criteria established in Step 2a. Priority areas for fire operations should be delineated by type, such as:
  - a. Initial attack priority areas
  - b. Resource pre-positioning and staging priority areas
2. Spatially delineate areas where opportunities exist to enhance or improve suppression capability.
3. Spatially delineate areas where wildfire can be managed to achieve land use plan and COT objectives.

### **Post-Fire Rehabilitation**

1. Spatially delineate priority areas for post-fire rehabilitation using criteria in Step 2a.
2. Priority areas for post-fire rehabilitation should be based on resistance and resiliency and pre-fire landscape sagebrush cover and include consideration of:
  - a. Seeding priority areas
  - b. Invasive annual grasses priority treatment areas (herbicide, mechanical, biological (herbivory or seeding),
  - c. Priority areas requiring combinations of treatments (e.g., herbicide followed by seeding)
3. Identify coordination needed between renewable resource, fire management, and fuels management staff to facilitate planning and implementation of post-fire rehabilitation treatments.

This completes the assessment process and sets the stage for more detailed project planning and NEPA associated with implementing on-the-ground treatments and management changes.

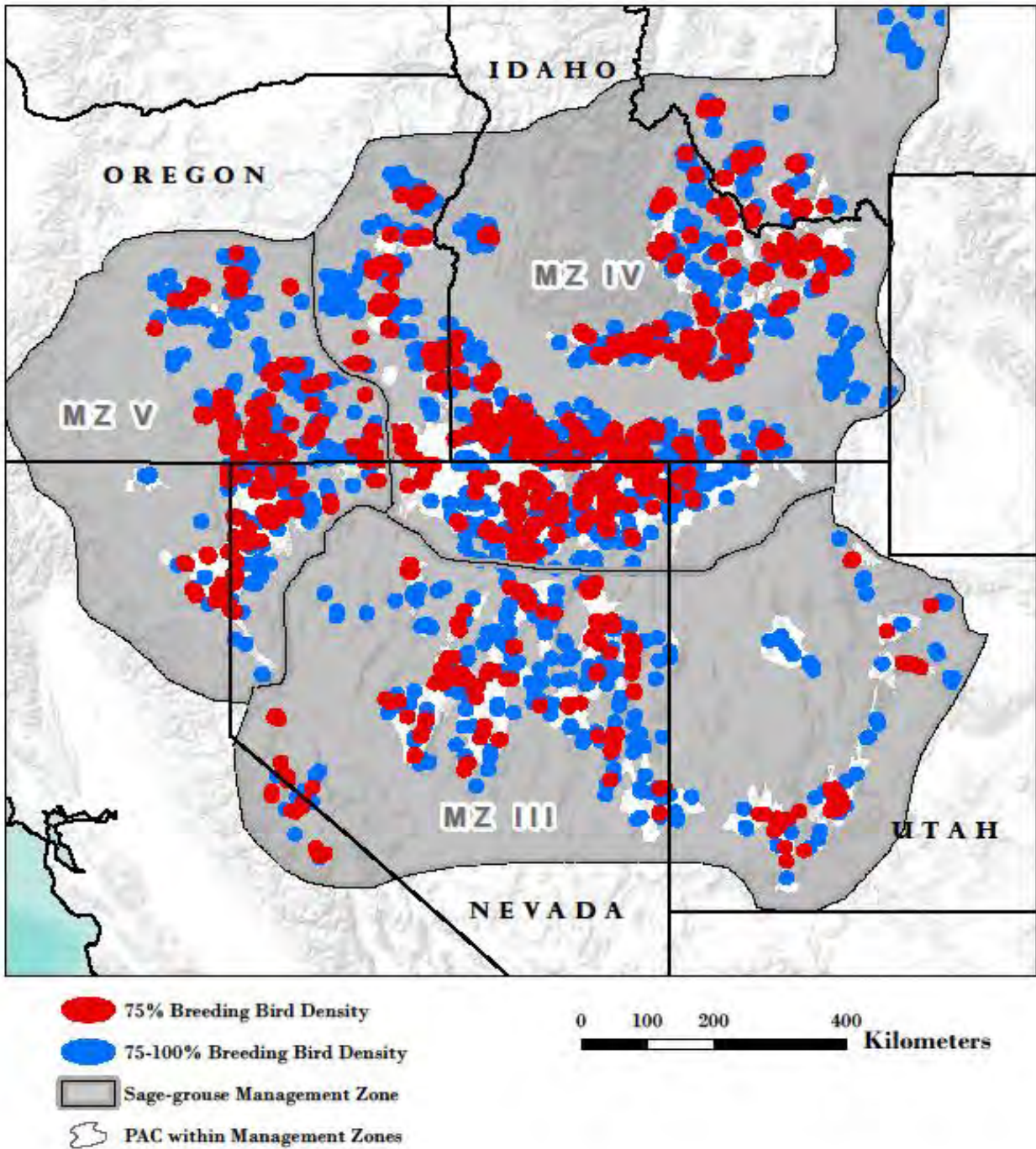
Members of the FIAT Development and Review teams are listed in Appendix 5.

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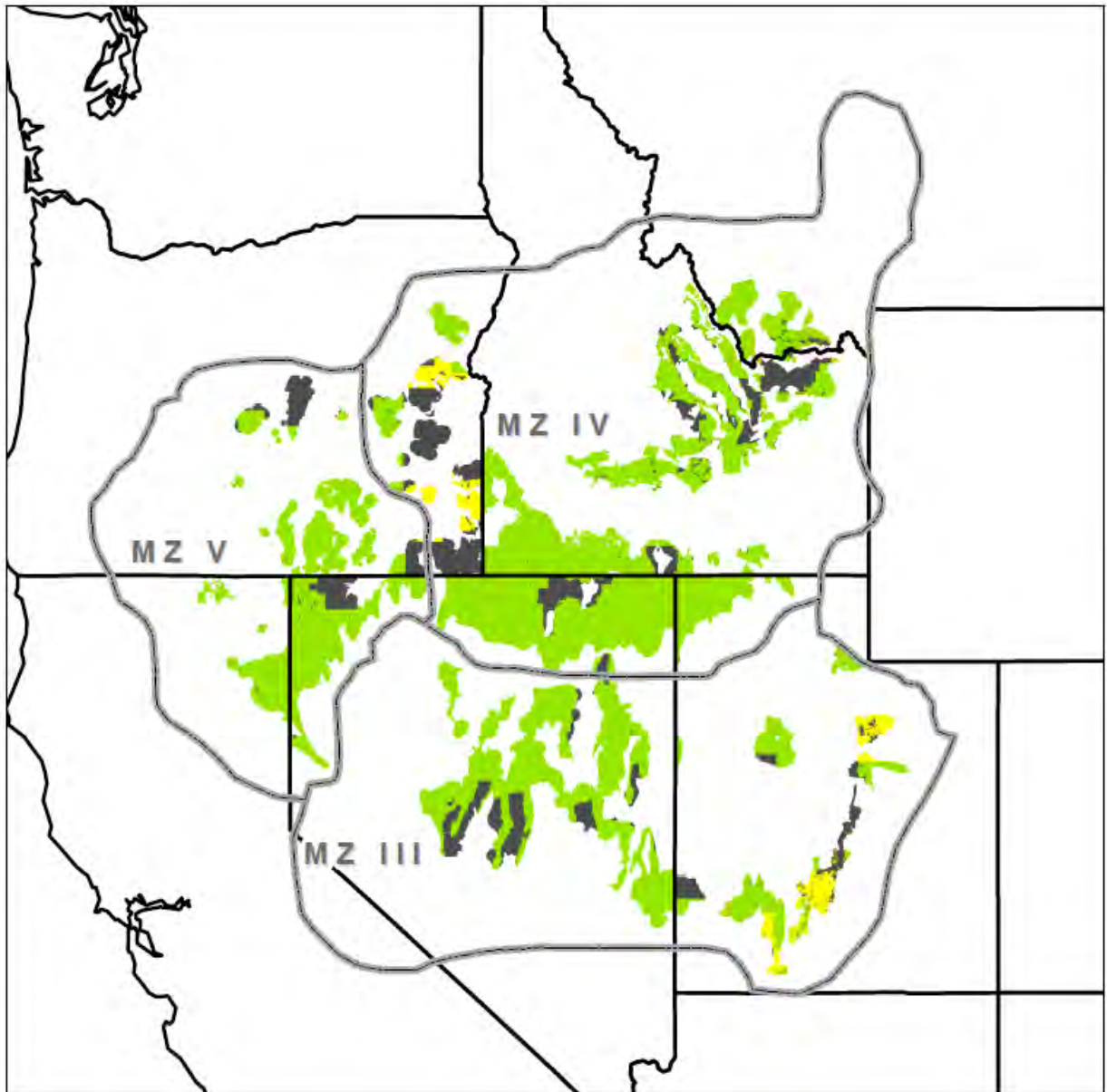
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**Appendix 1.** Sage-grouse breeding bird density thresholds for 75% and 100% of the breeding birds, Management Zones, and PACs. Breeding bird density of 75 to 100% is included in this figure to provide context for local management units when making decisions concerning connectivity between populations and PACs.







**Appendix 2.** Gaps in SSURGO soil survey data in Management Zones III, IV, and V. STATSGO2 soil survey data used to fill these gaps.




 Sage-grouse Management Zone

Data Source for Soil Surveys within PACs

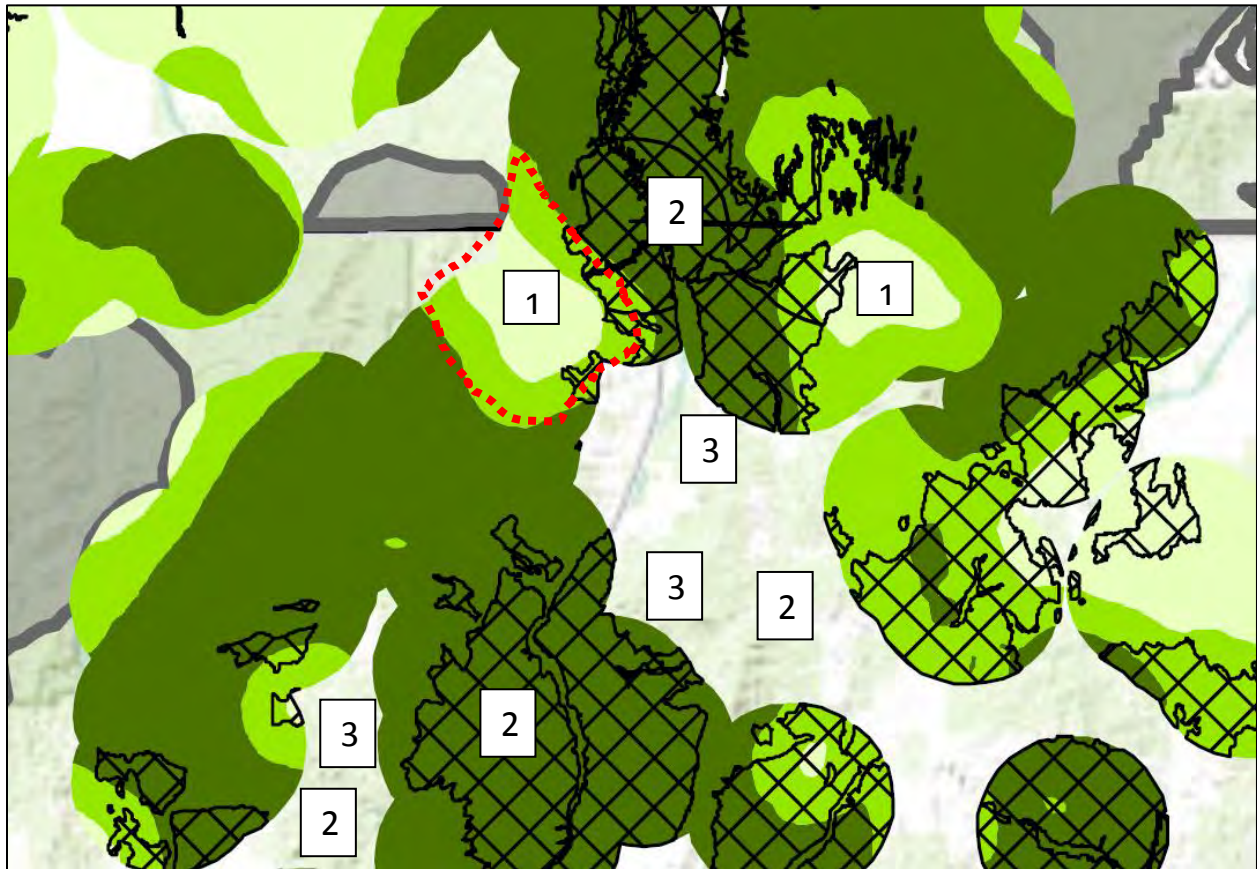
 SSURGO




 Draft SSURGO

 STATSGO

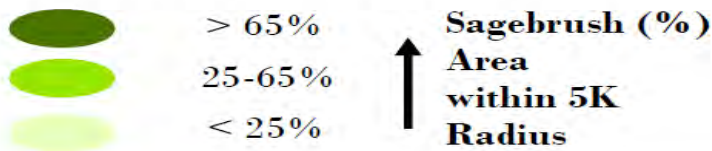
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 Kilometers

**Appendix 3.** Example of potential management strategies applied to Wildfire/Invasive Annual Grass Scenario.



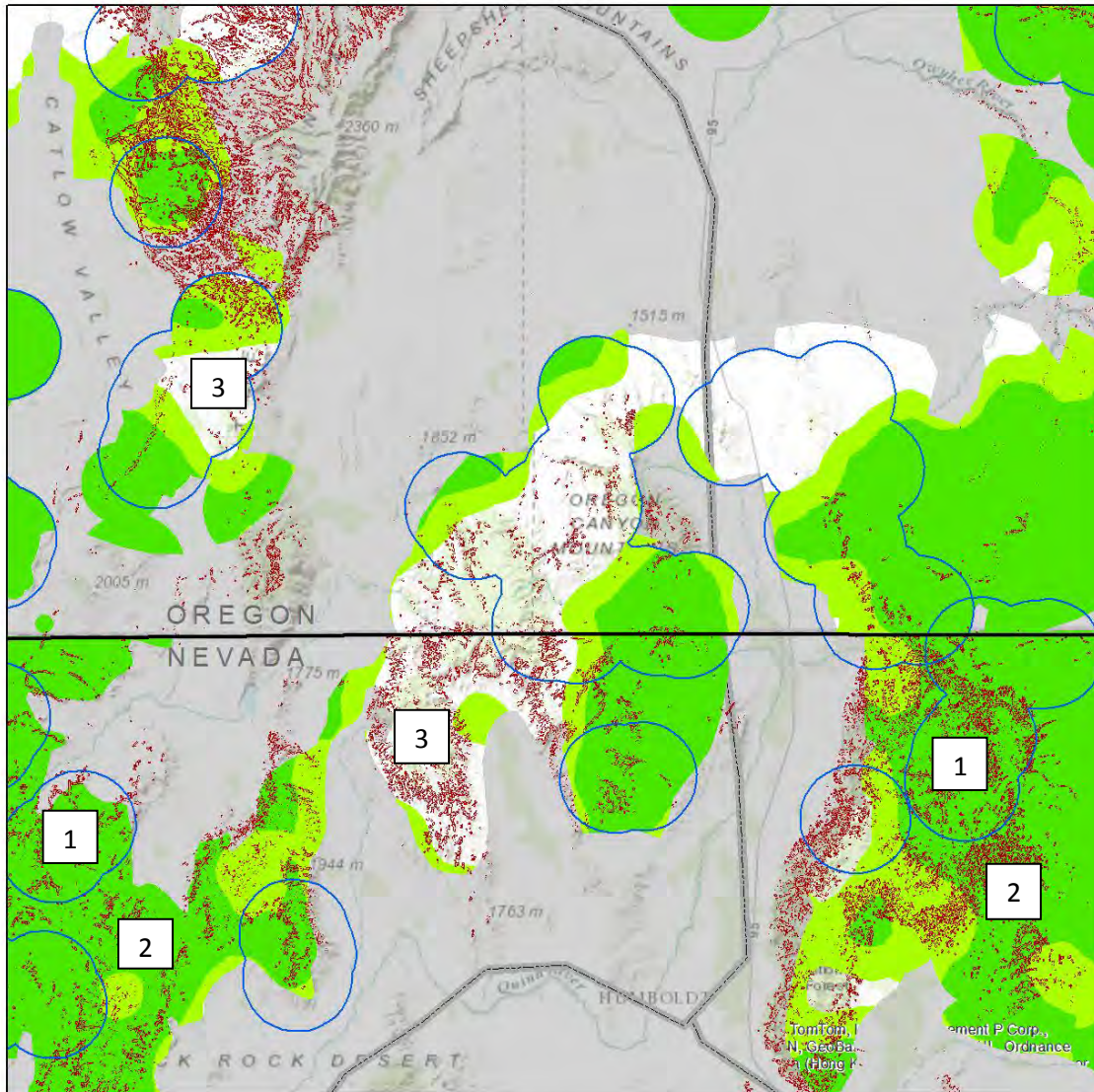
-  High Breeding Bird Density (75%)  
Overlapping Warm & Dry Regime
-  Sage-grouse Management Zone
-  Sage-grouse High Priority PAC within Management Zones

**High Sage-grouse Breeding Bird Density**



- 1** High priority for habitat restoration and post-fire rehabilitation to restore connectivity.
- 2** High priority for fire suppression within and around area given >65% sagebrush landscape cover and low resistance/resilience.
- 3** High priority for fuels management to reduce likelihood of wildfires in low resistance/resilience habitat with >65% landscape cover.

Appendix 4. Management strategy example for Western Juniper expansion.



- ◆ Conifer Expansion (risk model) surrounding PAC
- BB\_Density\_75\_Merge selection selection selection
- PAC within Management Zones
- ▭ Sage-grouse Management Zone
- Sagebrush (%) Area within a 5K Radius**
- > 65%
- 25-65%
- < 25%



- 1 High priority (emphasis area) for juniper control (>25% landscape sagebrush cover & 75% BBD)
- 2 Moderate priority (emphasis area) for juniper control (>25% landscape sagebrush cover)
- 3 Very low priority (<25% landscape sagebrush cover)

## Appendix 5. Members of FIAT Development and Review Team

### Development Team

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# THE GREATER SAGE-GROUSE MONITORING FRAMEWORK

Bureau of Land Management  
U.S. Forest Service

*Developed by  
the Interagency  
Greater  
Sage-Grouse  
Disturbance  
and Monitoring  
Subteam*

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# The Greater Sage-Grouse Monitoring Framework

Developed by the Interagency Greater Sage-Grouse Disturbance and Monitoring Subteam

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## INTRODUCTION

The purpose of this U.S. Bureau of Land Management (BLM) and U.S. Forest Service (USFS) Greater Sage-Grouse Monitoring Framework (hereafter, monitoring framework) is to describe the methods to monitor habitats and evaluate the implementation and effectiveness of the BLM's national planning strategy (attachment to BLM Instruction Memorandum 2012-044), the BLM resource management plans (RMPs), and the USFS's land management plans (LMPs) to conserve the species and its habitat. The regulations for the BLM (43 CFR 1610.4-9) and the USFS (36 CFR part 209, published July 1, 2010) require that land use plans establish intervals and standards, as appropriate, for monitoring and evaluations based on the sensitivity of the resource to the decisions involved. Therefore, the BLM and the USFS will use the methods described herein to collect monitoring data and to evaluate implementation and effectiveness of the Greater Sage-Grouse (GRSG) (hereafter, sage-grouse) planning strategy and the conservation measures contained in their respective land use plans (LUPs). A monitoring plan specific to the Environmental Impact Statement, land use plan, or field office will be developed after the Record of Decision is signed. For a summary of the frequency of reporting, see Attachment A, An Overview of Monitoring Commitments. Adaptive management will be informed by data collected at any and all scales.

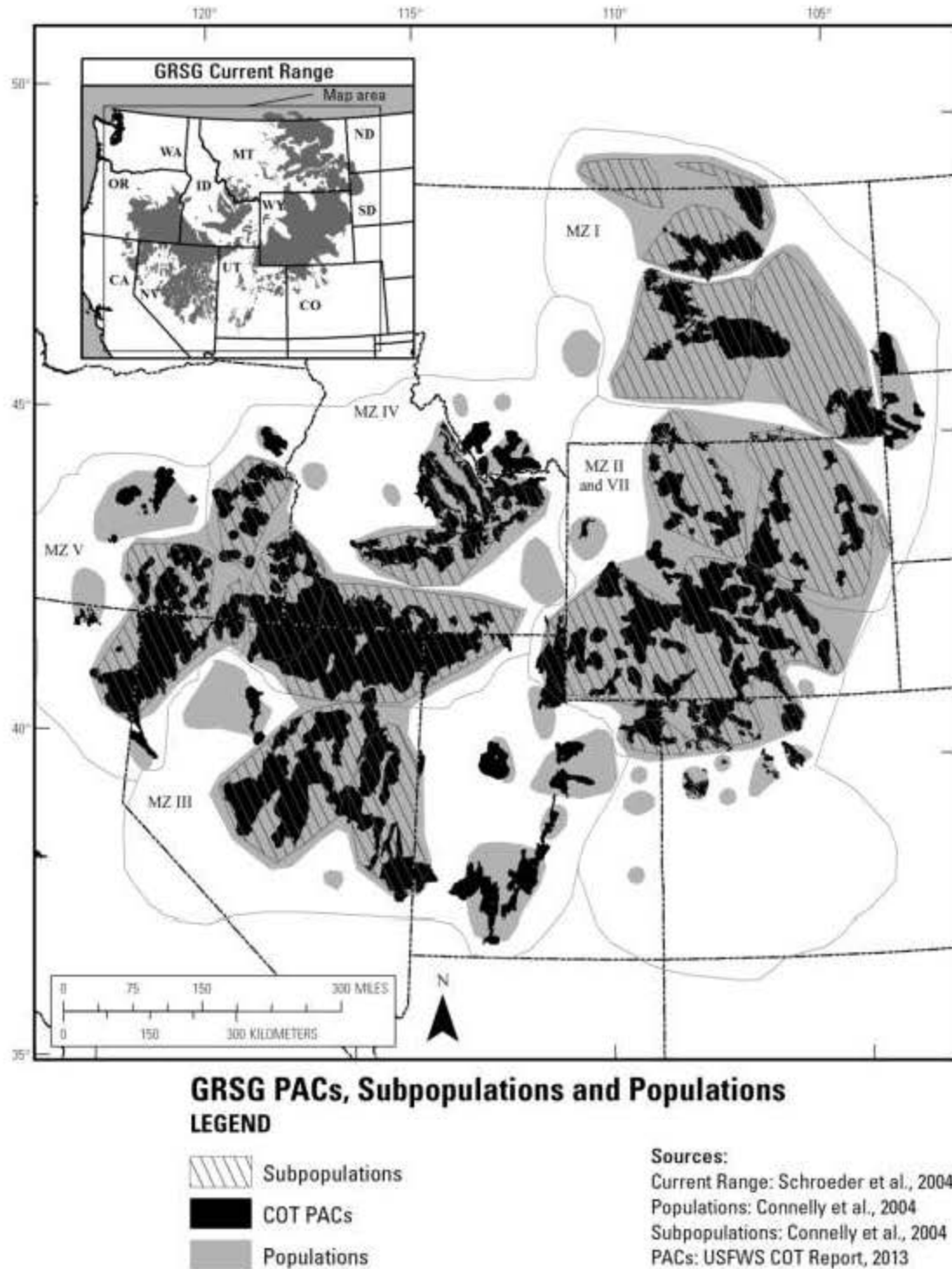
To ensure that the BLM and the USFS are able to make consistent assessments about sage-grouse habitats across the range of the species, this framework lays out the methodology—at multiple scales—for monitoring of implementation and disturbance and for evaluating the effectiveness of BLM and USFS actions to conserve the species and its habitat. Monitoring efforts will include data for measurable quantitative indicators of sagebrush availability, anthropogenic disturbance levels, and sagebrush conditions. Implementation monitoring results will allow the BLM and the USFS to evaluate the extent that decisions from their LUPs to conserve sage-grouse and their habitat have been implemented. State fish and wildlife agencies will collect population monitoring information, which will be incorporated into effectiveness monitoring as it is made available.

This multiscale monitoring approach is necessary, as sage-grouse are a landscape species and conservation is scale-dependent to the extent that conservation actions are implemented within seasonal habitats to benefit populations. The four orders of habitat selection (Johnson 1980) used in this monitoring framework are described by Connelly et al. (2003) and were applied specifically to the scales of sage-grouse habitat selection by Stiver et al. (*in press*) as first order (broad scale), second order (mid scale), third order (fine scale), and fourth order (site scale). Habitat selection and habitat use by sage-grouse occur at multiple scales and are driven by multiple environmental and behavioral factors. Managing and monitoring sage-grouse habitats are complicated by the differences in habitat selection across the range and habitat use by individual birds within a given season. Therefore, the tendency to look at a single indicator of habitat suitability or only one scale limits managers' ability to identify the threats to sage-grouse



and to respond at the appropriate scale. For descriptions of these habitat suitability indicators for each scale, see “Sage-Grouse Habitat Assessment Framework: Multiscale Habitat Assessment Tool” (HAF; Stiver et al. *in press*).

Monitoring methods and indicators in this monitoring framework are derived from the current peer-reviewed science. Rangewide, best available datasets for broad- and mid-scale monitoring will be acquired. If these existing datasets are not readily available or are inadequate, but they are necessary to inform the indicators of sagebrush availability, anthropogenic disturbance levels, and sagebrush conditions, the BLM and the USFS will strive to develop datasets or obtain information to fill these data gaps. Datasets that are not readily available to inform the fine- and site-scale indicators will be developed. These data will be used to generate monitoring reports at the appropriate and applicable geographic scales, boundaries, and analysis units: across the range of sage-grouse as defined by Schroeder et al. (2004), and clipped by Western Association of Fish and Wildlife Agencies (WAFWA) Management Zone (MZ) (Stiver et al. 2006) boundaries and other areas as appropriate for size (e.g., populations based on Connelly et al. 2004). (See Figure 1, Map of Greater Sage-Grouse range, populations, subpopulations, and Priority Areas for Conservation as of 2013.) This broad- and mid-scale monitoring data and analysis will provide context for RMP/LMP areas; states; GRSG Priority Habitat, General Habitat, and other sage-grouse designated management areas; and Priority Areas for Conservation (PACs), as defined in “Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report” (Conservation Objectives Team [COT] 2013). Hereafter, all of these areas will be referred to as “sage-grouse areas.”



**Figure 1.** Map of Greater Sage-Grouse range, populations, subpopulations, and Priority Areas for Conservation as of 2013.

This monitoring framework is divided into two sections. The broad- and mid-scale methods, described in Section I, provide a consistent approach across the range of the species to monitor implementation decisions and actions, mid-scale habitat attributes (e.g., sagebrush availability and habitat degradation), and population changes to determine the effectiveness of the planning strategy and management decisions. (See Table 1, Indicators for monitoring implementation of the national planning strategy, RMP/LMP decisions, sage-grouse habitat, and sage-grouse populations at the broad and mid scales.) For sage-grouse habitat at the fine and site scales, described in Section II, this monitoring framework describes a consistent approach (e.g., indicators and methods) for monitoring sage-grouse seasonal habitats. Funding, support, and dedicated personnel for broad- and mid-scale monitoring will be renewed annually through the normal budget process. For an overview of BLM and USFS multiscale monitoring commitments, see Attachment A.

**Table 1.** Indicators for monitoring implementation of the national planning strategy, RMP/LMP decisions, sage-grouse habitat, and sage-grouse populations at the broad and mid scales.

Implementation		Habitat		Population (State Wildlife Agencies)
<i>Geographic Scales</i>		Availability	Degradation	Demographics
Broad Scale: From the range of sage-grouse to WAFWA Management Zones	BLM/USFS National planning strategy goal and objectives	Distribution and amount of sagebrush within the range	Distribution and amount of energy, mining, and infrastructure facilities	WAFWA Management Zone population trend
Mid Scale: From WAFWA Management Zone to populations; PACs	RMP/LMP decisions	Mid-scale habitat indicators (HAF; Table 2 herein, e.g., percent of sagebrush per unit area)	Distribution and amount of energy, mining, and infrastructure facilities (Table 2 herein)	Individual population trend

## I. BROAD AND MID SCALES

First-order habitat selection, the broad scale, describes the physical or geographical range of a species. The first-order habitat of the sage-grouse is defined by populations of sage-grouse associated with sagebrush landscapes, based on Schroeder et al. 2004, and Connelly et al. 2004, and on population or habitat surveys since 2004. An intermediate scale between the broad and mid scales was delineated by WAFWA from floristic provinces within which similar environmental factors influence vegetation communities. This scale is referred to as the WAFWA Sage-Grouse Management Zones (MZs). Although no indicators are specific to this scale, these MZs are biologically meaningful as reporting units.

Second-order habitat selection, the mid-scale, includes sage-grouse populations and PACs. The second order includes at least 40 discrete populations and subpopulations (Connelly et al. 2004). Populations range in area from 150 to 60,000 mi<sup>2</sup> and are nested within MZs. PACs range from 20 to 20,400 mi<sup>2</sup> and are nested within population areas.

Other mid-scale landscape indicators, such as patch size and number, patch connectivity, linkage areas, and landscape matrix and edge effects (Stiver et al. *in press*) will also be assessed. The methods used to calculate these metrics will be derived from existing literature (Knick et al. 2011, Leu and Hanser 2011, Knick and Hanser 2011).

### A. Implementation (Decision) Monitoring

Implementation monitoring is the process of tracking and documenting the implementation (or the progress toward implementation) of RMP/LMP decisions. The BLM and the USFS will monitor implementation of project-level and/or site-specific actions and authorizations, with their associated conditions of approval/stipulations for sage-grouse, spatially (as appropriate) within Priority Habitat, General Habitat, and other sage-grouse designated management areas, at a minimum, for the planning area. These actions and authorizations, as well as progress toward completing and implementing activity-level plans, will be monitored consistently across all planning units and will be reported to BLM and USFS headquarters annually, with a summary report every 5 years, for the planning area. A national-level GRSG Land Use Plan Decision Monitoring and Reporting Tool is being developed to describe how the BLM and the USFS will consistently and systematically monitor and report implementation-level activity plans and implementation actions for all plans within the range of sage-grouse. A description of this tool for collection and reporting of tabular and spatially explicit data will be included in the Record of Decision or approved plan. The BLM and the USFS will provide data that can be integrated with other conservation efforts conducted by state and federal partners.

## **B. Habitat Monitoring**

The U.S. Fish and Wildlife Service (USFWS), in its 2010 listing decision for the sage-grouse, identified 18 threats contributing to the destruction, modification, or curtailment of sage-grouse habitat or range (75 FR 13910 2010). The BLM and the USFS will, therefore, monitor the relative extent of these threats that remove sagebrush, both spatially and temporally, on all lands within an analysis area, and will report on amount, pattern, and condition at the appropriate and applicable geographic scales and boundaries. These 18 threats have been aggregated into three broad- and mid-scale measures to account for whether the threat predominantly removes sagebrush or degrades habitat. (See Table 2, Relationship between the 18 threats and the three habitat disturbance measures for monitoring.) The three measures are:

Measure 1: Sagebrush Availability (percent of sagebrush per unit area)

Measure 2: Habitat Degradation (percent of human activity per unit area)

Measure 3: Energy and Mining Density (facilities and locations per unit area)

These three habitat disturbance measures will evaluate disturbance on all lands, regardless of land ownership. The direct area of influence will be assessed with the goal of accounting for actual removal of sagebrush on which sage-grouse depend (Connelly et al. 2000) and for habitat degradation as a surrogate for human activity. Measure 1 (sagebrush availability) examines where disturbances have removed plant communities that support sagebrush (or have broadly removed sagebrush from the landscape). Measure 1, therefore, monitors the change in sagebrush availability—or, specifically, where and how much of the sagebrush community is available within the range of sage-grouse. The sagebrush community is defined as the ecological systems that have the capability of supporting sagebrush vegetation and seasonal sage-grouse habitats within the range of sage-grouse (see Section I.B.1., Sagebrush Availability). Measure 2 (see Section I.B.2., Habitat Degradation Monitoring) and Measure 3 (see Section I.B.3., Energy and Mining Density) focus on where habitat degradation is occurring by using the footprint/area of direct disturbance and the number of facilities at the mid scale to identify the relative amount of degradation per geographic area of interest and in areas that have the capability of supporting sagebrush and seasonal sage-grouse use. Measure 2 (habitat degradation) not only quantifies footprint/area of direct disturbance but also establishes a surrogate for those threats most likely to have ongoing activity. Because energy development and mining activities are typically the most intensive activities in sagebrush habitat, Measure 3 (the density of active energy development, production, and mining sites) will help identify areas of particular concern for such factors as noise, dust, traffic, etc. that degrade sage-grouse habitat.

**Table 2.** Relationship between the 18 threats and the three habitat disturbance measures for monitoring.

Note: Data availability may preclude specific analysis of individual layers. See the detailed methodology for more information.

<b>USFWS Listing Decision Threat</b>	<b>Sagebrush Availability</b>	<b>Habitat Degradation</b>	<b>Energy and Mining Density</b>
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X		
Invasive Species	X		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and saleable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights-of-way		X	

The methods to monitor disturbance found herein differ slightly from methods used in Manier et al. 2013, which provided a baseline environmental report (BER) of datasets of disturbance across jurisdictions. One difference is that, for some threats, the BER data were for federal lands only. In addition, threats were assessed individually, using different assumptions from those in this monitoring framework about how to quantify the location and magnitude of threats. The methodology herein builds on the BER methodology and identifies datasets and procedures to use the best available data across the range of the sage-grouse and to formulate a consistent approach to quantify impact of the threats through time. This methodology also describes an approach to combine the threats and calculate each of the three habitat disturbance measures.

### **B.1. Sagebrush Availability (Measure 1)**

Sage-grouse populations have been found to be more resilient where a percentage of the landscape is maintained in sagebrush (Knick and Connelly 2011), which will be determined by sagebrush availability. Measure 1 has been divided into two submeasures to describe sagebrush availability on the landscape:

Measure 1a: the current amount of sagebrush on the geographic area of interest, and

Measure 1b: the amount of sagebrush on the geographic area of interest compared with the amount of sagebrush the landscape of interest could ecologically support.

Measure 1a (the current amount of sagebrush on the landscape) will be calculated using this formula: [the existing updated sagebrush layer] divided by [the geographic area of interest]. The appropriate geographic areas of interest for sagebrush availability include the species' range, WAFWA MZs, populations, and PACs. In some cases these sage-grouse areas will need to be aggregated to provide an estimate of sagebrush availability with an acceptable level of accuracy.

Measure 1b (the amount of sagebrush for context within the geographic area of interest) will be calculated using this formula: [existing sagebrush divided by [pre-EuroAmerican settlement geographic extent of lands that could have supported sagebrush]]. This measure will provide information to set the context for a given geographic area of interest during evaluations of monitoring data. The information could also be used to inform management options for restoration or mitigation and to inform effectiveness monitoring.

The sagebrush base layer for Measure 1 will be based on geospatial vegetation data adjusted for the threats listed in Table 2. The following subsections of this monitoring framework describe the methodology for determining both the current availability of sagebrush on the landscape and the context of the amount of sagebrush on the landscape at the broad and mid scales.

### a. Establishing the Sagebrush Base Layer

The current geographic extent of sagebrush vegetation within the rangewide distribution of sage-grouse populations will be ascertained using the most recent version of the Existing Vegetation Type (EVT) layer in LANDFIRE (2013). LANDFIRE EVT was selected to serve as the sagebrush base layer for five reasons: 1) it is the only nationally consistent vegetation layer that has been updated multiple times since 2001; 2) the ecological systems classification within LANDFIRE EVT includes multiple sagebrush type classes that, when aggregated, provide a more accurate (compared with individual classes) and seamless sagebrush base layer across jurisdictional boundaries; 3) LANDFIRE performed a rigorous accuracy assessment from which to derive the rangewide uncertainty of the sagebrush base layer; 4) LANDFIRE is consistently used in several recent analyses of sagebrush habitats (Knick et al. 2011, Leu and Hanser 2011, Knick and Hanser 2011); and 5) LANDFIRE EVT can be compared against the geographic extent of lands that are believed to have had the capability of supporting sagebrush vegetation pre-EuroAmerican settlement [LANDFIRE Biophysical Setting (BpS)]. This fifth reason provides a reference point for understanding how much sagebrush currently remains in a defined geographic area of interest compared with how much sagebrush existed historically (Measure 1b). Therefore, the BLM and the USFS have determined that LANDFIRE provides the best available data at broad and mid scales to serve as a sagebrush base layer for monitoring changes in the geographic extent of sagebrush. The BLM and the USFS, in addition to aggregating the sagebrush types into the sagebrush base layer, will aggregate the accuracy assessment reports from LANDFIRE to document the cumulative accuracy for the sagebrush base layer. The BLM—through its Assessment, Inventory, and Monitoring (AIM) program and, specifically, the BLM’s landscape monitoring framework (Taylor et al. 2014)—will provide field data to the LANDFIRE program to support continuous quality improvements of the LANDFIRE EVT layer. The sagebrush layer based on LANDFIRE EVT will allow for the mid-scale estimation of the existing percent of sagebrush across a variety of reporting units. This sagebrush base layer will be adjusted by changes in land cover and successful restoration for future calculations of sagebrush availability (Measures 1a and 1b).

This layer will also be used to determine the trend in other landscape indicators, such as patch size and number, patch connectivity, linkage areas, and landscape matrix and edge effects (Stiver et al. *in press*). In the future, changes in sagebrush availability, generated annually, will be included in the sagebrush base layer. The landscape metrics will be recalculated to examine changes in pattern and abundance of sagebrush at the various geographic boundaries. This information will be included in effectiveness monitoring (See Section I.D., Effectiveness Monitoring).

Within the USFS and the BLM, forest-wide and field office–wide existing vegetation classification mapping and inventories are available that provide a much finer level of data than what is provided through LANDFIRE. Where available, these finer-scale products will be useful for additional and complementary mid-scale indicators and local-scale analyses (see Section II,



Fine and Site Scales). The fact that these products are not available everywhere limits their utility for monitoring at the broad and mid scale, where consistency of data products is necessary across broader geographies.

### ***Data Sources for Establishing and Monitoring Sagebrush Availability***

There were three criteria for selecting the datasets for establishing and monitoring the change in sagebrush availability (Measure 1):

- Nationally consistent dataset available across the range
- Known level of confidence or accuracy in the dataset
- Continual maintenance of dataset and known update interval

Datasets meeting these criteria are listed in Table 3, Datasets for establishing and monitoring changes in sagebrush availability.

### ***LANDFIRE Existing Vegetation Type (EVT) Version 1.2***

LANDFIRE EVT represents existing vegetation types on the landscape derived from remote sensing data. Initial mapping was conducted using imagery collected in approximately 2001. Since the initial mapping there have been two update efforts: version 1.1 represents changes before 2008, and version 1.2 reflects changes on the landscape before 2010. Version 1.2 will be used as the starting point to develop the sagebrush base layer.

Sage-grouse subject matter experts determined which of the ecological systems from the LANDFIRE EVT to use in the sagebrush base layer by identifying the ecological systems that have the capability of supporting sagebrush vegetation and that could provide suitable seasonal habitat for the sage-grouse. (See Table 4, Ecological systems in BpS and EVT capable of supporting sagebrush vegetation and capable of providing suitable seasonal habitat for Greater Sage-Grouse.) Two additional vegetation types that are not ecological systems were added to the EVT: *Artemisia tridentata* ssp. *vaseyana* Shrubland Alliance and *Quercus gambelii* Shrubland Alliance. These alliances have species composition directly related to the Rocky Mountain Lower Montane-Foothill Shrubland ecological system and the Rocky Mountain Gambel Oak-Mixed Montane Shrubland ecological system, both of which are ecological systems in LANDFIRE BpS. In LANDFIRE EVT, however, in some map zones, the Rocky Mountain Lower Montane-Foothill Shrubland ecological system and the Rocky Mountain Gambel Oak-Mixed Montane Shrubland ecological system were named *Artemisia tridentata* ssp. *vaseyana* Shrubland Alliance and *Quercus gambelii* Shrubland Alliance, respectively.

**Table 3.** Datasets for establishing and monitoring changes in sagebrush availability.

Dataset	Source	Update Interval	Most Recent Version Year	Use
BioPhysical Setting v1.1	LANDFIRE	Static	2008	Denominator for sagebrush availability
Existing Vegetation Type v1.2	LANDFIRE	Static	2010	Numerator for sagebrush availability
Cropland Data Layer	National Agricultural Statistics Service	Annual	2012	Agricultural updates; removes existing sagebrush from numerator of sagebrush availability
National Land Cover Dataset Percent Imperviousness	Multi-Resolution Land Characteristics Consortium (MRLC)	5-Year	2011 (next available in 2016)	Urban area updates; removes existing sagebrush from numerator of sagebrush availability
Fire Perimeters	GeoMac	Annual	2013	< 1,000-acre fire updates; removes existing sagebrush from numerator of sagebrush availability
Burn Severity	Monitoring Trends in Burn Severity	Annual	2012 (2-year delay in data availability)	> 1,000-acre fire updates; removes existing sagebrush from numerator of sagebrush availability except for unburned sagebrush islands

**Table 4.** Ecological systems in BpS and EVT capable of supporting sagebrush vegetation and capable of providing suitable seasonal habitat for Greater Sage-Grouse.

Ecological System	Sagebrush Vegetation that the Ecological System has the Capability of Producing
Colorado Plateau Mixed Low Sagebrush Shrubland	<i>Artemisia arbuscula</i> ssp. <i>longiloba</i> <i>Artemisia bigelovii</i> <i>Artemisia nova</i> <i>Artemisia frigida</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i>
Columbia Plateau Low Sagebrush Steppe	<i>Artemisia arbuscula</i> <i>Artemisia arbuscula</i> ssp. <i>longiloba</i> <i>Artemisia nova</i>

Columbia Plateau Scabland Shrubland	<i>Artemisia rigida</i>
Columbia Plateau Steppe and Grassland	<i>Artemisia</i> spp.
Great Basin Xeric Mixed Sagebrush Shrubland	<i>Artemisia arbuscula</i> ssp. <i>longicaulis</i> <i>Artemisia arbuscula</i> ssp. <i>longiloba</i> <i>Artemisia nova</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i>
Inter-Mountain Basins Big Sagebrush Shrubland	<i>Artemisia tridentata</i> ssp. <i>tridentata</i> <i>Artemisia tridentata</i> ssp. <i>xericensis</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i>
Inter-Mountain Basins Big Sagebrush Steppe	<i>Artemisia cana</i> ssp. <i>cana</i> <i>Artemisia tridentata</i> ssp. <i>tridentata</i> <i>Artemisia tridentata</i> ssp. <i>xericensis</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia tripartita</i> ssp. <i>tripartita</i> <i>Artemisia frigida</i>
Inter-Mountain Basins Curl-Leaf Mountain Mahogany Woodland and Shrubland	<i>Artemisia tridentata</i> ssp. <i>vaseyana</i> <i>Artemisia arbuscula</i> <i>Artemisia tridentata</i>
Inter-Mountain Basins Mixed Salt Desert Scrub	<i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia spinescens</i>
Inter-Mountain Basins Montane Sagebrush Steppe	<i>Artemisia tridentata</i> ssp. <i>vaseyana</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia nova</i> <i>Artemisia arbuscula</i> <i>Artemisia tridentata</i> ssp. <i>spiciformis</i>
Inter-Mountain Basins Semi-Desert Shrub-Steppe	<i>Artemisia tridentata</i> <i>Artemisia bigelovii</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i>
Northwestern Great Plains Mixed Grass Prairie	<i>Artemisia cana</i> ssp. <i>cana</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i> <i>Artemisia frigida</i>
Northwestern Great Plains Shrubland	<i>Artemisia cana</i> ssp. <i>cana</i> <i>Artemisia tridentata</i> ssp. <i>tridentata</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i>
Rocky Mountain Gambel Oak-Mixed Montane Shrubland	<i>Artemisia tridentata</i>
Rocky Mountain Lower Montane-Foothill Shrubland	<i>Artemisia nova</i> <i>Artemisia tridentata</i> <i>Artemisia frigida</i>
Western Great Plains Floodplain Systems	<i>Artemisia cana</i> ssp. <i>cana</i>
Western Great Plains Sand Prairie	<i>Artemisia cana</i> ssp. <i>cana</i>
Wyoming Basins Dwarf Sagebrush Shrubland and Steppe	<i>Artemisia arbuscula</i> ssp. <i>longiloba</i> <i>Artemisia nova</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia tripartita</i> ssp. <i>rupicola</i>
<i>Artemisia tridentata</i> ssp. <i>vaseyana</i> Shrubland Alliance (EVT only)	<i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
<i>Quercus gambelii</i> Shrubland Alliance (EVT only)	<i>Artemisia tridentata</i>

### ***Accuracy and Appropriate Use of LANDFIRE Datasets***

Because of concerns over the thematic accuracy of individual classes mapped by LANDFIRE, all ecological systems listed in Table 4 will be merged into one value that represents the sagebrush base layer. With all ecological systems aggregated, the combined accuracy of the sagebrush base layer (EVT) will be much greater than if all categories were treated separately.

LANDFIRE performed the original accuracy assessment of its EVT product on a map zone basis. There are 20 LANDFIRE map zones that cover the historical range of sage-grouse as defined by Schroeder (2004). (See Attachment B, User and Producer Accuracies for Aggregated Ecological Systems within LANDFIRE Map Zones.) The aggregated sagebrush base layer for monitoring had user accuracies ranging from 57.1% to 85.7% and producer accuracies ranging from 56.7% to 100%.

*LANDFIRE EVT data are not designed to be used at a local level.* In reports of the percent sagebrush statistic for the various reporting units (Measure 1a), the uncertainty of the percent sagebrush will increase as the size of the reporting unit gets smaller. LANDFIRE data should never be used at the 30m pixel level (900m<sup>2</sup> resolution of raster data) for any reporting. The smallest geographic extent for using the data to determine percent sagebrush is at the PAC level; for the smallest PACs, the initial percent sagebrush estimate will have greater uncertainties compared with the much larger PACs.

### ***Agricultural Adjustments for the Sagebrush Base Layer***

The dataset for the geographic extent of agricultural lands will come from the National Agricultural Statistics Service (NASS) Cropland Data Layer (CDL) (<http://www.nass.usda.gov/research/Cropland/Release/index.htm>). CDL data are generated annually, with estimated producer accuracies for “large area row crops ranging from the mid 80% to mid-90%,” depending on the state ([http://www.nass.usda.gov/research/Cropland/sarsfaqs2.htm#Section3\\_18.0](http://www.nass.usda.gov/research/Cropland/sarsfaqs2.htm#Section3_18.0)). Specific information on accuracy may be found on the NASS metadata website (<http://www.nass.usda.gov/research/Cropland/metadata/meta.htm>). CDL provided the only dataset that matches the three criteria (nationally consistent, known level of accuracy, and periodically updated) for use in this monitoring framework and represents the best available agricultural lands mapping product.

The CDL data contain both agricultural classes and nonagricultural classes. For this effort, and in the baseline environmental report (Manier et al. 2013), nonagricultural classes were removed from the original dataset. The excluded classes are:

Barren (65 & 131), Deciduous Forest (141), Developed/High Intensity (124), Developed/Low Intensity (122), Developed/Med Intensity (123), Developed/Open Space (121), Evergreen Forest (142), Grassland Herbaceous (171), Herbaceous Wetlands (195), Mixed Forest (143), Open

Water (83 & 111), Other Hay/Non Alfalfa (37), Pasture/Hay (181), Pasture/Grass (62), Perennial Ice/Snow (112), Shrubland (64 & 152), Woody Wetlands (190).

The rule set for adjusting the sagebrush base layer for agricultural lands (and for updating the base layer for agricultural lands in the future) is that once an area is classified as agriculture in any year of the CDL, those pixels will remain out of the sagebrush base layer even if a new version of the CDL classifies that pixel as one of the nonagricultural classes listed above. The assumption is that even though individual pixels may be classified as a nonagricultural class in any given year, the pixel has not necessarily been restored to a natural sagebrush community that would be included in Table 4. A further assumption is that once an area has moved into agricultural use, it is unlikely that the area would be restored to sagebrush. Should that occur, however, the method and criteria for adding pixels back into the sagebrush base layer would follow those found in the sagebrush restoration monitoring section of this monitoring framework (see Section I.B.1.b., Monitoring Sagebrush Availability).

### ***Urban Adjustments for the Sagebrush Base Layer***

The National Land Cover Database (NLCD) (Fry et al. 2011) includes a percent imperviousness dataset that was selected as the best available dataset to be used for urban adjustments and monitoring. These data are generated on a 5-year cycle and are specifically designed to support monitoring efforts. Other datasets were evaluated and lacked the spatial specificity that was captured in the NLCD product. Any new impervious pixel in NLCD will be removed from the sagebrush base layer through the monitoring process. Although the impervious surface layer includes a number of impervious pixels outside of urban areas, this is acceptable for the adjustment and monitoring for two reasons. First, an evaluation of national urban area datasets did not reveal a layer that could be confidently used in conjunction with the NLCD product to screen impervious pixels outside of urban zones. This is because unincorporated urban areas were not being included, thus leaving large chunks of urban pixels unaccounted for in this rule set. Second, experimentation with setting a threshold on the percent imperviousness layer that would isolate rural features proved to be unsuccessful. No combination of values could be identified that would result in the consistent ability to limit impervious pixels outside urban areas. Therefore, to ensure consistency in the monitoring estimates, all impervious pixels will be used.

### ***Fire Adjustments for the Sagebrush Base Layer***

Two datasets were selected for performing fire adjustments and updates: GeoMac fire perimeters and Monitoring Trends in Burn Severity (MTBS). An existing data standard in the BLM requires that all fires of more than 10 acres are to be reported to GeoMac; therefore, there will be many small fires of less than 10 acres that will not be accounted for in the adjustment and monitoring attributable to fire. Using fire perimeters from GeoMac, all sagebrush pixels falling

within the perimeter of fires less than 1,000 acres will be used to adjust and monitor the sagebrush base layer.

For fires greater than 1,000 acres, MTBS was selected as a means to account for unburned sagebrush islands during the update process of the sagebrush base layer. The MTBS program (<http://www.mtbs.gov>) is an ongoing, multiyear project to map fire severity and fire perimeters consistently across the United States. One of the burn severity classes within MTBS is an unburned to low-severity class. This burn severity class will be used to represent unburned islands of sagebrush within the fire perimeter for the sagebrush base layer. Areas within the other severity classes within the fire perimeter will be removed from the base sagebrush layer during the update process. Not all wildfires, however, have the same impacts on the recovery of sagebrush habitat, depending largely on soil moisture and temperature regimes. For example, cooler, moister sagebrush habitat has a higher potential for recovery or, if needed, restoration than does the warmer, dryer sagebrush habitat. These cooler, moister areas will likely be detected as sagebrush in future updates to LANDFIRE.

### ***Conifer Encroachment Adjustment for the Sagebrush Base Layer***

Conifer encroachment into sagebrush vegetation reduces the spatial extent of sage-grouse habitat (Davies et al. 2011, Baruch-Mordo et al. 2013). Conifer species that show propensity for encroaching into sagebrush vegetation resulting in sage-grouse habitat loss include various juniper species, such as Utah juniper (*Juniperus osteosperma*), western juniper (*Juniperus occidentalis*), Rocky Mountain juniper (*Juniperus scopulorum*), pinyon species, including singleleaf pinyon (*Pinus monophylla*) and pinyon pine (*Pinus edulis*), ponderosa pine (*Pinus ponderosa*), lodgepole pine (*Pinus contorta*), and Douglas fir (*Pseudotsuga menziesii*) (Gruell et al. 1986, Grove et al. 2005, Davies et al. 2011).

A rule set for conifer encroachment was developed to adjust the sagebrush base layer. To capture the geographic extent of sagebrush that is likely to experience conifer encroachment, ecological systems within LANDFIRE EVT version 1.2 (NatureServe 2011) were identified if they had the capability of supporting both the conifer species (listed above) and sagebrush vegetation. Those ecological systems were deemed to be the plant communities with conifers most likely to encroach into sagebrush vegetation. (See Table 5, Ecological systems with conifers most likely to encroach into sagebrush vegetation.) Sagebrush vegetation was defined as including sagebrush species or subspecies that provide habitat for the Greater Sage-Grouse and that are included in the HAF. (See Attachment C, Sagebrush Species and Subspecies Included in the Selection Criteria for Building the EVT and BpS Layers.) An adjacency analysis was conducted to identify all sagebrush pixels that were directly adjacent to these conifer ecological systems, and these pixels were removed from the sagebrush base layer.

**Table 5.** Ecological systems with conifers most likely to encroach into sagebrush vegetation.

EVT Ecological Systems	Coniferous Species and Sagebrush Vegetation that the Ecological System has the Capability of Producing
Colorado Plateau Pinyon-Juniper Woodland	<i>Pinus edulis</i> <i>Juniperus osteosperma</i> <i>Artemisia tridentata</i> <i>Artemisia arbuscula</i> <i>Artemisia nova</i> <i>Artemisia tridentata</i> ssp. <i>tridentata</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i> <i>Artemisia bigelovii</i> <i>Artemisia pygmaea</i>
Columbia Plateau Western Juniper Woodland and Savanna	<i>Juniperus occidentalis</i> <i>Pinus ponderosa</i> <i>Artemisia tridentata</i> <i>Artemisia arbuscula</i> <i>Artemisia rigida</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
East Cascades Oak-Ponderosa Pine Forest and Woodland	<i>Pinus ponderosa</i> <i>Pseudotsuga menziesii</i> <i>Artemisia tridentata</i> <i>Artemisia nova</i>
Great Basin Pinyon-Juniper Woodland	<i>Pinus monophylla</i> <i>Juniperus osteosperma</i> <i>Artemisia arbuscula</i> <i>Artemisia nova</i> <i>Artemisia tridentata</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
Northern Rocky Mountain Ponderosa Pine Woodland and Savanna	<i>Pinus ponderosa</i> <i>Artemisia tridentata</i> <i>Artemisia arbuscula</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
Rocky Mountain Foothill Limber Pine-Juniper Woodland	<i>Juniperus osteosperma</i> <i>Juniperus scopulorum</i> <i>Artemisia nova</i> <i>Artemisia tridentata</i>
Rocky Mountain Poor-Site Lodgepole Pine Forest	<i>Pinus contorta</i> <i>Pseudotsuga menziesii</i> <i>Pinus ponderosa</i> <i>Artemisia tridentata</i>
Southern Rocky Mountain Pinyon-Juniper Woodland	<i>Pinus edulis</i> <i>Juniperus monosperma</i> <i>Artemisia bigelovii</i> <i>Artemisia tridentata</i> <i>Artemisia tridentata</i> ssp. <i>wyomingensis</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
Southern Rocky Mountain Ponderosa Pine Woodland	<i>Pinus ponderosa</i> <i>Pseudotsuga menziesii</i>

	<i>Pinus edulis</i> <i>Pinus contorta</i> <i>Juniperus</i> spp. <i>Artemisia nova</i> <i>Artemisia tridentata</i> <i>Artemisia arbuscula</i> <i>Artemisia tridentata</i> ssp. <i>vaseyana</i>
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### ***Invasive Annual Grasses Adjustments for the Sagebrush Base Layer***

There are no invasive species datasets from 2010 to the present (beyond the LANDFIRE data) that meet the three criteria (nationally consistent, known level of accuracy, and periodically updated) for use in the determination of the sagebrush base layer. For a description of how invasive species land cover will be incorporated in the sagebrush base layer in the future, see Section I.B.1.b., Monitoring Sagebrush Availability.

### ***Sagebrush Restoration Adjustments for the Sagebrush Base Layer***

There are no datasets from 2010 to the present that could provide additions to the sagebrush base layer from restoration treatments that meet the three criteria (nationally consistent, known level of accuracy, and periodically updated); therefore, no adjustments were made to the sagebrush base layer calculated from the LANDFIRE EVT (version 1.2) attributable to restoration activities since 2010. Successful restoration treatments before 2010 are assumed to have been captured in the LANDFIRE refresh.

## **b. Monitoring Sagebrush Availability**

### ***Monitoring Sagebrush Availability***

Sagebrush availability will be updated annually by incorporating changes to the sagebrush base layer attributable to agriculture, urbanization, and wildfire. The monitoring schedule for the existing sagebrush base layer updates is as follows:

***2010 Existing Sagebrush Base Layer*** = [Sagebrush EVT] minus [2006 Imperviousness Layer] minus [2009 and 2010 CDL] minus [2009/10 GeoMac Fires that are less than 1,000 acres] minus [2009/10 MTBS Fires that are greater than 1,000 acres, excluding unburned sagebrush islands within the perimeter] minus [Conifer Encroachment Layer]

***2012 Existing Sagebrush Update*** = [2010 Existing Sagebrush Base Layer] minus [2011 Imperviousness Layer] minus [2011 and 2012 CDL] minus [2011/12 GeoMac Fires < 1,000 acres] minus [2011/12 MTBS Fires that are greater than 1,000 acres, excluding unburned sagebrush islands within the perimeter]

***Monitoring Existing Sagebrush post 2012*** = [Previous Existing Sagebrush Update Layer] minus [Imperviousness Layer (if new data are available)] minus [Next 2 years of CDL] minus [Next 2 years of GeoMac Fires < 1,000 acres] minus [Next 2 years of MTBS Fires that are greater than



1,000 acres, excluding unburned sagebrush islands within the perimeter] plus  
[restoration/monitoring data provided by the field]

### ***Monitoring Sagebrush Restoration***

Restoration after fire, after agricultural conversion, after seedings of introduced grasses, or after treatments of pinyon pine and/or juniper are examples of updates to the sagebrush base layer that can add sagebrush vegetation back into sagebrush availability in the landscape. When restoration has been determined to be successful through rangewide, consistent, interagency fine- and site-scale monitoring, the polygonal data will be used to add sagebrush pixels back into the broad- and mid-scale sagebrush base layer.

### ***Measure 1b: Context for Monitoring the Amount of Sagebrush in a Geographic Area of Interest***

Measure 1b describes the amount of sagebrush on the landscape of interest compared with the amount of sagebrush the landscape of interest could ecologically support. Areas with the potential to support sagebrush were derived from the BpS data layer that describes sagebrush pre-EuroAmerican settlement (v1.2 of LANDFIRE).

The identification and spatial locations of natural plant communities (vegetation) that are believed to have existed on the landscape (BpS) were constructed based on an approximation of the historical (pre-EuroAmerican settlement) disturbance regime and how the historical disturbance regime operated on the current biophysical environment. BpS is composed of map units that are based on NatureServe (2011) terrestrial ecological systems classification.

The ecological systems within BpS used for this monitoring framework are those ecological systems that are capable of supporting sagebrush vegetation and of providing seasonal habitat for sage-grouse (Table 4). Ecological systems selected included sagebrush species or subspecies that are included in the HAF and listed in Attachment C.

The BpS layer does not have an associated accuracy assessment, given the lack of any reference data. Visual inspection of the BpS data, however, reveals inconsistencies in the labeling of pixels among LANDFIRE map zones. The reason for these inconsistencies is that the rule sets used to map a given ecological system will vary among map zones based on different physical, biological, disturbance, and atmospheric regimes of the region. These variances can result in artificial edges in the map. Metrics will be calculated, however, at broad spatial scales using BpS potential vegetation type, not small groupings or individual pixels. Therefore, the magnitude of these observable errors in the BpS layer will be minor compared with the size of the reporting units. Since BpS will be used to identify broad landscape patterns of dominant vegetation, these inconsistencies will have only a minor impact on the percent sagebrush availability calculation. *As with the LANDFIRE EVT, LANDFIRE BpS data are not designed to be used at a local level. LANDFIRE data should never be used at the 30m pixel level for reporting.*

In conclusion, sagebrush availability data will be used to inform effectiveness monitoring and initiate adaptive management actions as necessary. The 2010 estimate of sagebrush availability will serve as the base year, and an updated estimate for 2012 will be reported in 2014 after all datasets become available. The 2012 estimate will capture changes attributable to wildfire, agriculture, and urban development. Subsequent updates will always include new fire and agricultural data and new urban data when available. Restoration data that meet the criteria for adding sagebrush areas back into the sagebrush base layer will be factored in as data allow. Given data availability, there will be a 2-year lag (approximately) between when the estimate is generated and when the data used for the estimate become available (e.g., the 2014 sagebrush availability will be included in the 2016 estimate).

### ***Future Plans***

Geospatial data used to generate the sagebrush base layer will be available through the BLM's EGIS web portal and geospatial gateway or through the authoritative data source. Legacy datasets will be preserved so that trends may be calculated. Additionally, accuracy assessment data for all source datasets will be provided on the portal either spatially, where applicable, or through the metadata. Accuracy assessment information was deemed vital to help users understand the limitation of the sagebrush estimates; it will be summarized spatially by map zone and will be included in the portal.

LANDFIRE plans to begin a remapping effort in 2015. This remapping has the potential to improve the overall quality of data products greatly, primarily through the use of higher-quality remote sensing datasets. Additionally, the BLM and the Multi-Resolution Land Characteristics Consortium (MRLC) are working to improve the accuracy of vegetation map products for broad- and mid-scale analyses through the Grass/Shrub mapping effort. The Grass/Shrub mapping effort applies the Wyoming multiscale sagebrush habitat methodology (Homer et al. 2009) to depict spatially the fractional percent cover estimates for five components rangewide and West-wide. These five components are percent cover of sagebrush vegetation, percent bare ground, percent herbaceous vegetation (grass and forbs combined), annual vegetation, and percent shrubs. A benefit of the design of these fractional cover maps is that they facilitate monitoring "within" class variation (e.g., examination of declining trend in sagebrush cover for individual pixels). This "within" class variation can serve as one indicator of sagebrush quality that cannot be derived from LANDFIRE's EVT information. The Grass/Shrub mapping effort is not a substitute for fine-scale monitoring but will leverage fine-scale data to support the validation of the mapping products. An evaluation will be conducted to determine if either dataset is of great enough quality to warrant replacing the existing sagebrush layers. At the earliest, this evaluation will occur in 2018 or 2019, depending on data availability.

## **B.2. Habitat Degradation Monitoring (Measure 2)**

The measure of habitat degradation will be calculated by combining the footprints of threats identified in Table 2. The footprint is defined as the direct area of influence of “active” energy and infrastructure; it is used as a surrogate for human activity. Although these analyses will try to summarize results at the aforementioned meaningful geographic areas of interest, some may be too small to report the metrics appropriately and may be combined (smaller populations, PACs within a population, etc.). Data sources for each threat are found in Table 6, Geospatial data sources for habitat degradation. Specific assumptions (inclusion criteria for data, width/area assumptions for point and line features, etc.) and methodology for each threat, and the combined measure, are detailed below. All datasets will be updated annually to monitor broad- and mid-scale year-to-year changes and to calculate trends in habitat degradation to inform adaptive management. A 5-year summary report will be provided to the USFWS.

### **a. Habitat Degradation Datasets and Assumptions**

#### ***Energy (oil and gas wells and development facilities)***

This dataset will compile information from three oil and gas databases: the proprietary IHS Enerdeq database, the BLM Automated Fluid Minerals Support System (AFMSS) database, and the proprietary Platts (a McGraw-Hill Financial Company) GIS Custom Data (hereafter, Platts) database of power plants. Point data from wells active within the last 10 years from IHS and producing wells from AFMSS will be considered as a 5-acre (2.0ha) direct area of influence centered on the well point, as recommended by the BLM WO-300 (Minerals and Realty Management). Plugged and abandoned wells will be removed if the date of well abandonment was before the first day of the reporting year (i.e., for the 2015 reporting year, a well must have been plugged and abandoned by 12/31/2014 to be removed). Platts oil and gas power plants data (subset to operational power plants) will also be included as a 5-acre (2.0ha) direct area of influence.

***Additional Measure: Reclaimed Energy-related Degradation.*** This dataset will include those wells that have been plugged and abandoned. This measure thereby attempts to measure energy-related degradation that has been reclaimed but not necessarily fully restored to sage-grouse habitat. This measure will establish a baseline by using wells that have been plugged and abandoned within the last 10 years from the IHS and AFMSS datasets. Time lags for lek attendance in response to infrastructure have been documented to be delayed 2–10 years from energy development activities (Harju et al. 2010). Reclamation actions may require 2 or more years from the Final Abandonment Notice. Sagebrush seedling establishment may take 6 or more years from the point of seeding, depending on such variables as annual precipitation, annual temperature, and soil type and depth (Pyke 2011). This 10-year period is conservative and assumes some level of habitat improvement 10 years after plugging. Research by Hemstrom et al. (2002), however,

proposes an even longer period—more than 100 years—for recovery of sagebrush habitats, even with active restoration approaches. Direct area of influence will be considered 3 acres (1.2ha) (J. Perry, personal communication, February 12, 2014). This additional layer/measure could be used at the broad and mid scale to identify areas where sagebrush habitat and/or potential sagebrush habitat is likely still degraded. This layer/measure could also be used where further investigation at the fine or site scale would be warranted to: 1) quantify the level of reclamation already conducted, and 2) evaluate the amount of restoration still required for sagebrush habitat recovery. At a particular level (e.g., population, PACs), these areas and the reclamation efforts/success could be used to inform reclamation standards associated with future developments. Once these areas have transitioned from reclamation standards to meeting *restoration* standards, they can be added back into the sagebrush availability layer using the same methodology as described for adding restoration treatment areas lost to wildfire and agriculture conversion (see Monitoring Sagebrush Restoration in Section I.B.1.b., Monitoring Sagebrush Availability). This dataset will be updated annually from the IHS dataset.

### ***Energy (coal mines)***

Currently, there is no comprehensive dataset available that identifies the footprint of active coal mining across all jurisdictions. Therefore, point and polygon datasets will be used each year to identify coal mining locations. Data sources will be identified and evaluated annually and will include at a minimum: BLM coal lease polygons, U.S. Energy Information Administration mine occurrence points, U.S. Office of Surface Mining Reclamation and Enforcement coal mining permit polygons (as available), and U.S. Geological Survey (USGS) Mineral Resources Data System mine occurrence points. These data will inform where active coal mining may be occurring. Additionally, coal power plant data from Platts power plants database (subset to operational power plants) will be included. Aerial imagery will then be used to digitize manually the active coal mining and coal power plants surface disturbance in or near these known occurrence areas. While the date of aerial imagery varies by scale, the most current data available from Esri and/or Google will be used to locate (generally at 1:50,000 and below) and digitize (generally at 1:10,000 and below) active coal mine and power plant direct area of influence. Coal mine location data source and imagery date will be documented for each digitized coal polygon at the time of creation. Subsurface facility locations (polygon or point location as available) will also be collected if available, included in density calculations, and added to the active surface activity layer as appropriate (if an actual direct area of influence can be located).

### ***Energy (wind energy facilities)***

This dataset will be a subset of the Federal Aviation Administration (FAA) Digital Obstacles point file. Points where “Type\_” = “WINDMILL” will be included. Direct area of influence of these point features will be measured by converting to a polygon dataset as a direct area of

influence of 3 acres (1.2ha) centered on each tower point. See the BLM’s “Wind Energy Development Programmatic Environmental Impact Statement” (BLM 2005). Additionally, Platts power plants database will be used for transformer stations associated with wind energy sites (subset to operational power plants), also with a 3-acre (1.2ha) direct area of influence.

***Energy (solar energy facilities)***

This dataset will include solar plants as compiled with the Platts power plants database (subset to operational power plants). This database includes an attribute that indicates the operational capacity of each solar power plant. Total capacity at the power plant was based on ratings of the in-service unit(s), in megawatts. Direct area of influence polygons will be centered over each point feature representing 7.3ac (3.0ha) per megawatt of the stated operational capacity, per the report of the National Renewable Energy Laboratory (NREL), “Land-Use Requirements for Solar Power Plants in the United States” (Ong et al. 2013).

***Energy (geothermal energy facilities)***

This dataset will include geothermal wells in existence or under construction as compiled with the IHS wells database and power plants as compiled with the Platts database (subset to operational power plants). Direct area of influence of these point features will be measured by converting to a polygon dataset of 3 acres (1.2ha) centered on each well or power plant point.

***Mining (active developments; locatable, leasable, saleable)***

This dataset will include active locatable mining locations as compiled with the proprietary InfoMine database. Aerial imagery will then be used to digitize manually the active mining surface disturbance in or near these known occurrence areas. While the date of aerial imagery varies by scale, the most current data available from Esri and/or Google will be used to locate (generally at 1:50,000 and below) and digitize (generally at 1:10,000 and below) active mine direct area of influence. Mine location data source and imagery date will be documented for each digitized polygon at the time of creation. Currently, there are no known compressive databases available for leasable or saleable mining sites beyond coal mines. Other data sources will be evaluated and used as they are identified or as they become available. Point data may be converted to polygons to represent direct area of influence unless actual surface disturbance is available.

***Infrastructure (roads)***

This dataset will be compiled from the proprietary Esri StreetMap Premium for ArcGIS. Dataset features that will be used are: Interstate Highways, Major Roads, and Surface Streets to capture most paved and “crowned and ditched” roads while not including “two-track” and 4-wheel-drive routes. These minor roads, while not included in the broad- and mid-scale monitoring, may support a volume of traffic that can have deleterious effects on sage-grouse leks. It may be

appropriate to consider the frequency and type of use of roads in a NEPA analysis for a proposed project. This fine- and site-scale analysis will require more site-specific data than is identified in this monitoring framework. The direct area of influence for roads will be represented by 240.2ft, 84.0ft, and 40.7ft (73.2m, 25.6m, and 12.4m) total widths centered on the line feature for Interstate Highways, Major Roads, and Surface Streets, respectively (Knick et al. 2011). The most current dataset will be used for each monitoring update. *Note: This is a related but different dataset than what was used in BER (Manier et al. 2013). Individual BLM/USFS planning units may use different road layers for fine- and site-scale monitoring.*

### ***Infrastructure (railroads)***

This dataset will be a compilation from the Federal Railroad Administration Rail Lines of the USA dataset. Non-abandoned rail lines will be used; abandoned rail lines will not be used. The direct are of influence for railroads will be represented by a 30.8ft (9.4m) total width (Knick et al. 2011) centered on the non-abandoned railroad line feature.

### ***Infrastructure (power lines)***

This line dataset will be derived from the proprietary Platts transmission lines database. Linear features in the dataset attributed as “buried” will be removed from the disturbance calculation. Only “In Service” lines will be used; “Proposed” lines will not be used. Direct area of influence will be determined by the kV designation: 1–199 kV (100ft/30.5m), 200–399 kV (150ft/45.7m), 400–699 kV (200ft/61.0m), and 700-or greater kV (250ft/76.2m) based on average right-of-way and structure widths, according to BLM WO-300 (Minerals and Realty Management).

### ***Infrastructure (communication towers)***

This point dataset will be compiled from the Federal Communications Commission (FCC) communication towers point file; all duplicate points will be removed. It will be converted to a polygon dataset by using a direct area of influence of 2.5 acres (1.0ha) centered on each communication tower point (Knick et al. 2011).

### ***Infrastructure (other vertical structures)***

This point dataset will be compiled from the FAA’s Digital Obstacles point file. Points where “Type\_” = “WINDMILL” will be removed. Duplicate points from the FCC communication towers point file will be removed. Remaining features will be converted to a polygon dataset using a direct area of influence of 2.5 acres (1.0ha) centered on each vertical structure point (Knick et al. 2011).

### ***Other Developed Rights-of-Way***

Currently, no additional data sources for other rights-of-way have been identified; roads, power lines, railroads, pipelines, and other known linear features are represented in the categories

described above. The newly purchased IHS data do contain pipeline information; however, this database does not currently distinguish between above-ground and underground pipelines. If additional features representing human activities are identified, they will be added to monitoring reports using similar assumptions to those used with the threats described above.

#### **b. Habitat Degradation Threat Combination and Calculation**

The threats targeted for measuring human activity (Table 2) will be converted to direct area of influence polygons as described for each threat above. These threat polygon layers will be combined and features dissolved to create one overall polygon layer representing footprints of active human activity in the range of sage-grouse. Individual datasets, however, will be preserved to indicate which types of threats may be contributing to overall habitat degradation.

This measure has been divided into three submeasures to describe habitat degradation on the landscape. Percentages will be calculated as follows:

Measure 2a. Footprint by geographic area of interest: Divide area of the active/direct footprint by the total area of the geographic area of interest (% disturbance in geographic area of interest).

Measure 2b. Active/direct footprint by historical sagebrush potential: Divide area of the active footprint that coincides with areas with historical sagebrush potential (BpS calculation from habitat availability) within a given geographic area of interest by the total area with sagebrush potential within the geographic area of interest (% disturbance on potential historical sagebrush in geographic area of interest).

Measure 2c. Active/direct footprint by current sagebrush: Divide area of the active footprint that coincides with areas of existing sagebrush (EVT calculation from habitat availability) within a given geographic area of interest by the total area that is current sagebrush within the geographic area of interest (% disturbance on current sagebrush in geographic area of interest).

### **B.3. Energy and Mining Density (Measure 3)**

The measure of density of energy and mining will be calculated by combining the locations of energy and mining threats identified in Table 2. This measure will provide an estimate of the intensity of human activity or the intensity of habitat degradation. The number of energy facilities and mining locations will be summed and divided by the area of meaningful geographic areas of interest to calculate density of these activities. Data sources for each threat are found in Table 6. Specific assumptions (inclusion criteria for data, width/area assumptions for point and line features, etc.) and methodology for each threat, and the combined measure, are detailed

below. All datasets will be updated annually to monitor broad- and mid-scale year-to-year changes and 5-year (or longer) trends in habitat degradation.

**Table 6.** Geospatial data sources for habitat degradation (Measure 2).

<b>Degradation Type</b>	<b>Subcategory</b>	<b>Data Source</b>	<b>Direct Area of Influence</b>	<b>Area Source</b>
<b>Energy (oil &amp; gas)</b>	Wells	IHS; BLM (AFMSS)	5.0ac (2.0ha)	BLM WO-300
	Power Plants	Platts (power plants)	5.0ac (2.0ha)	BLM WO-300
<b>Energy (coal)</b>	Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resources Data System	Polygon area (digitized)	Esri/Google Imagery
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Energy (wind)</b>	Wind Turbines	Federal Aviation Administration	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	3.0ac (1.2ha)	BLM WO-300
<b>Energy (solar)</b>	Fields/Power Plants	Platts (power plants)	7.3ac (3.0ha)/MW	NREL
<b>Energy (geothermal)</b>	Wells	IHS	3.0ac (1.2ha)	BLM WO-300
	Power Plants	Platts (power plants)	Polygon area (digitized)	Esri Imagery
<b>Mining</b>	Locatable Developments	InfoMine	Polygon area (digitized)	Esri Imagery
<b>Infrastructure (roads)</b>	Surface Streets (Minor Roads)	Esri StreetMap Premium	40.7ft (12.4m)	USGS
	Major Roads	Esri StreetMap Premium	84.0ft (25.6m)	USGS
	Interstate Highways	Esri StreetMap Premium	240.2ft (73.2m)	USGS
<b>Infrastructure (railroads)</b>	Active Lines	Federal Railroad Administration	30.8ft (9.4m)	USGS
<b>Infrastructure (power lines)</b>	1-199kV Lines	Platts (transmission lines)	100ft (30.5m)	BLM WO-300
	200-399 kV Lines	Platts (transmission lines)	150ft (45.7m)	BLM WO-300
	400-699kV Lines	Platts (transmission lines)	200ft (61.0m)	BLM WO-300
	700+kV Lines	Platts (transmission lines)	250ft (76.2m)	BLM WO-300
<b>Infrastructure (communication)</b>	Towers	Federal Communications Commission	2.5ac (1.0ha)	BLM WO-300



### **a. Energy and Mining Density Datasets and Assumptions**

#### ***Energy (oil and gas wells and development facilities)***

(See Section I.B.2., Habitat Degradation Monitoring.)

#### ***Energy (coal mines)***

(See Section I.B.2., Habitat Degradation Monitoring.)

#### ***Energy (wind energy facilities)***

(See Section I.B.2., Habitat Degradation Monitoring.)

#### ***Energy (solar energy facilities)***

(See Section I.B.2., Habitat Degradation Monitoring.)

#### ***Energy (geothermal energy facilities)***

(See Section I.B.2., Habitat Degradation Monitoring.)

#### ***Mining (active developments; locatable, leasable, saleable)***

(See Section I.B.2., Habitat Degradation Monitoring.)

### **b. Energy and Mining Density Threat Combination and Calculation**

Datasets for energy and mining will be collected in two primary forms: point locations (e.g., wells) and polygon areas (e.g., surface coal mining). The following rule set will be used to calculate density for meaningful geographic areas of interest including standard grids and per polygon:

- 1) Point locations will be preserved; no additional points will be removed beyond the methodology described above. Energy facilities in close proximity (an oil well close to a wind tower) will be retained.
- 2) Polygons will not be merged, or features further dissolved. Thus, overlapping facilities will be retained, such that each individual threat will be a separate polygon data input for the density calculation.
- 3) The analysis unit (polygon or 640-acre section in a grid) will be the basis for counting the number of mining or energy facilities per unit area. Within the analysis unit, all point features will be summed, and any individual polygons will be counted as one (e.g., a coal mine will be counted as one facility within population). Where polygon features overlap multiple units (polygons or pixels), the facility will be counted as one in each unit where the polygon occurs (e.g., a polygon crossing multiple 640-acre

- sections would be counted as one in each 640-acre section for a density per 640-acre-section calculation).
- 4) In methodologies with different-sized units (e.g., MZs, populations, etc.) raw facility counts will be converted to densities by dividing the raw facility counts by the total area of the unit. Typically this will be measured as facilities per 640 acres.
  - 5) For uniform grids, raw facility counts will be reported. Typically this number will also be converted to facilities per 640 acres.
  - 6) Reporting may include summaries beyond the simple ones above. Zonal statistics may be used to smooth smaller grids to help display and convey information about areas within meaningful geographic areas of interest that have high levels of energy and/or mining activity.
  - 7) Additional statistics for each defined unit may also include adjusting the area to include only the area with the historical potential for sagebrush (BpS) or areas currently sagebrush (EVT).

Individual datasets and threat combination datasets for habitat degradation will be available through the BLM's EGIS web portal and geospatial gateway. Legacy datasets will be preserved so that trends may be calculated.

### **C. Population (Demographics) Monitoring**

State wildlife management agencies are responsible for monitoring sage-grouse populations within their respective states. WAFWA will coordinate this collection of annual population data by state agencies. These data will be made available to the BLM according to the terms of the forthcoming Greater Sage-Grouse Population Monitoring Memorandum of Understanding (MOU) (2014) between WAFWA and the BLM. The MOU outlines a process, timeline, and responsibilities for regular data sharing of sage-grouse population and/or habitat information for the purposes of implementing sage-grouse LUPs/amendments and subsequent effectiveness monitoring. Population areas were refined from the "Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report" (COT 2013) by individual state wildlife agencies to create a consistent naming nomenclature for future data analyses. These population data will be used for analysis at the applicable scale to supplement habitat effectiveness monitoring of management actions and to inform the adaptive management responses.

### **D. Effectiveness Monitoring**

Effectiveness monitoring will provide the data needed to evaluate BLM and USFS actions toward reaching the objective of the national planning strategy (BLM IM 2012-044)—to conserve sage-grouse populations and their habitat—and the objectives for the land use planning

area. Effectiveness monitoring methods described here will encompass multiple larger scales, from areas as large as the WAFWA MZ to the scale of this LUP. Effectiveness data used for these larger-scale evaluations will include all lands in the area of interest, regardless of surface ownership/management, and will help inform where finer-scale evaluations are needed, such as population areas smaller than an LUP or PACs within an LUP (described in Section II, Fine and Site Scales). Data will also include the trend of disturbance within these areas of interest to inform the need to initiate adaptive management responses as described in the land use plan.

Effectiveness monitoring reported for these larger areas provides the context to conduct effectiveness monitoring at finer scales. This approach also helps focus scarce resources to areas experiencing habitat loss, degradation, or population declines, without excluding the possibility of concurrent, finer-scale evaluations as needed where habitat or population anomalies have been identified through some other means.

To determine the effectiveness of the sage-grouse national planning strategy, the BLM and the USFS will evaluate the answers to the following questions and prepare a broad- and mid-scale effectiveness report:

- 1) Sagebrush Availability and Condition:
  - a. What is the amount of sagebrush availability and the change in the amount and condition of sagebrush?
  - b. What is the existing amount of sagebrush on the landscape and the change in the amount relative to the pre-EuroAmerican historical distribution of sagebrush (BpS)?
  - c. What is the trend and condition of the indicators describing sagebrush characteristics important to sage-grouse?
- 2) Habitat Degradation and Intensity of Activities:
  - a. What is the amount of habitat degradation and the change in that amount?
  - b. What is the intensity of activities and the change in the intensity?
  - c. What is the amount of reclaimed energy-related degradation and the change in the amount?
- 3) What is the population estimation of sage-grouse and the change in the population estimation?
- 4) How are the BLM and the USFS contributing to changes in the amount of sagebrush?
- 5) How are the BLM and the USFS contributing to disturbance?

The compilation of broad- and mid-scale data (and population trends as available) into an effectiveness monitoring report will occur on a 5-year reporting schedule (see Attachment A), which may be accelerated to respond to critical emerging issues (in consultation with the USFWS and state wildlife agencies). In addition, effectiveness monitoring results will be used to identify emerging issues and research needs and inform the BLM and the USFS adaptive

management strategy (see the adaptive management section of this Environmental Impact Statement).

To determine the effectiveness of the sage-grouse objectives of the land use plan, the BLM and the USFS will evaluate the answers to the following questions and prepare a plan effectiveness report:

- 1) Is this plan meeting the sage-grouse habitat objectives?
- 2) Are sage-grouse areas within the LUP meeting, or making progress toward meeting, land health standards, including the Special Status Species/wildlife habitat standard?
- 3) Is the plan meeting the disturbance objective(s) within sage-grouse areas?
- 4) Are the sage-grouse populations within this plan boundary and within the sage-grouse areas increasing, stable, or declining?

The effectiveness monitoring report for this LUP will occur on a 5-year reporting schedule (see Attachment A) or more often if habitat or population anomalies indicate the need for an evaluation to facilitate adaptive management or respond to critical emerging issues. Data will be made available through the BLM's EGIS web portal and the geospatial gateway.

### ***Methods***

At the broad and mid scales (PACs and above) the BLM and the USFS will summarize the vegetation, disturbance, and (when available) population data. Although the analysis will try to summarize results for PACs within each sage-grouse population, some populations may be too small to report the metrics appropriately and may need to be combined to provide an estimate with an acceptable level of accuracy. Otherwise, they will be flagged for more intensive monitoring by the appropriate landowner or agency. The BLM and the USFS will then analyze monitoring data to detect the trend in the amount of sagebrush; the condition of the vegetation in the sage-grouse areas (MacKinnon et al. 2011); the trend in the amount of disturbance; the change in disturbed areas owing to successful restoration; and the amount of new disturbance the BLM and/or the USFS has permitted. These data could be supplemented with population data (when available) to inform an understanding of the correlation between habitat and PACs within a population. This overall effectiveness evaluation must consider the lag effect response of populations to habitat changes (Garton et al. 2011).

*Calculating Question 1, National Planning Strategy Effectiveness:* The amount of sagebrush available in the large area of interest will use the information from Measure 1a (I.B.1., Sagebrush Availability) and calculate the change from the 2012 baseline to the end date of the reporting period. To calculate the change in the amount of sagebrush on the landscape to compare with the historical areas with potential to support sagebrush, the information from Measure 1b (I.B.1., Sagebrush Availability) will be used. To calculate the trend in the condition of sagebrush at the mid scale, three sources of data will be used: the BLM's Grass/Shrub mapping effort (Future Plans in Section I.B.1., Sagebrush Availability); the results from the calculation of the landscape

indicators, such as patch size (described below); and the BLM's Landscape Monitoring Framework (LMF) and sage-grouse intensification effort (also described below). The LMF and sage-grouse intensification effort data are collected in a statistical sampling framework that allows calculation of indicator values at multiple scales.

Beyond the importance of sagebrush availability to sage-grouse, the mix of sagebrush patches on the landscape at the broad and mid scale provides the life requisite of space for sage-grouse dispersal needs (see the HAF). The configuration of sagebrush habitat patches and the land cover or land use between the habitat patches at the broad and mid scales also defines suitability. There are three significant habitat indicators that influence habitat use, dispersal, and movement across populations: the size and number of habitat patches, the connectivity of habitat patches (linkage areas), and habitat fragmentation (scope of unsuitable and non-habitats between habitat patches). The most appropriate commercial software to measure patch dynamics, connectivity, and fragmentation at the broad and mid scales will be used, along with the same data layers derived for sagebrush availability.

The BLM initiated the LMF in 2011 in cooperation with the Natural Resources Conservation Service (NRCS). The objective of the LMF effort is to provide unbiased estimates of vegetation and soil condition and trend using a statistically balanced sample design across BLM lands. Recognizing that sage-grouse populations are more resilient where the sagebrush plant community has certain characteristics unique to a particular life stage of sage-grouse (Knick and Connelly 2011, Stiver et al. *in press*), a group of sage-grouse habitat and sagebrush plant community subject matter experts identified those vegetation indicators collected at LMF sampling points that inform sage-grouse habitat needs. The experts represented the Agricultural Research Service, BLM, NRCS, USFWS, WAFWA, state wildlife agencies, and academia. The common indicators identified include: species composition, foliar cover, height of the tallest sagebrush and herbaceous plant, intercanopy gap, percent of invasive species, sagebrush shape, and bare ground. To increase the precision of estimates of sagebrush conditions within the range of sage-grouse, additional plot locations in occupied sage-grouse habitat (Sage-Grouse Intensification) were added in 2013. The common indicators are also collected on sampling locations in the NRCS National Resources Inventory Rangeland Resource Assessment (<http://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/nri/?&cid=stelprdb1041620>).

The sage-grouse intensification baseline data will be collected over a 5-year period, and an annual sage-grouse intensification report will be prepared describing the status of the indicators. Beginning in year 6, the annual status report will be accompanied with a trend report, which will be available on an annual basis thereafter, contingent on continuation of the current monitoring budget. This information, in combination with the Grass/Shrub mapping information, the mid-scale habitat suitability indicator measures, and the sagebrush availability information will be used to answer Question 1 of the National Planning Strategy Effectiveness Report.

*Calculating Question 2, National Planning Strategy Effectiveness:* Evaluations of the amount of habitat degradation and the intensity of the activities in the area of interest will use the information from Measure 2 (Section I.B.2., Habitat Degradation Monitoring) and Measure 3 (Section I.B.3., Energy and Mining Density). The field office will collect data on the amount of reclaimed energy-related degradation on plugged and abandoned and oil/gas well sites. The data are expected to demonstrate that the reclaimed sites have yet to meet the habitat restoration objectives for sage-grouse habitat. This information, in combination with the amount of habitat degradation, will be used to answer Question 2 of the National Planning Strategy Effectiveness Report.

*Calculating Question 3, National Planning Strategy Effectiveness:* The change in sage-grouse estimated populations will be calculated from data provided by the state wildlife agencies, when available. This population data (Section I.C., Population [Demographics] Monitoring) will be used to answer Question 3 of the National Planning Strategy Effectiveness Report.

*Calculating Question 4, National Planning Strategy Effectiveness:* The estimated contribution by the BLM or the USFS to the change in the amount of sagebrush in the area of interest will use the information from Measure 1a (Section I.B.1., Sagebrush Availability). This measure is derived from the national datasets that remove sagebrush (Table 3). To determine the relative contribution of BLM and USFS management, the current Surface Management Agency geospatial data layer will be used to differentiate the amount of change for each management agency for this measure in the geographic areas of interest. This information will be used to answer Question 4 of the National Planning Strategy Effectiveness Report.

*Calculating Question 5, National Planning Strategy Effectiveness:* The estimated contribution by the BLM or the USFS to the change in the amount of disturbance in the area of interest will use the information from Measure 2a (Section I.B.2., Monitoring Habitat Degradation) and Measure 3 (Section I.B.3., Energy and Mining Density). These measures are all derived from the national disturbance datasets that degrade habitat (Table 6). To determine the relative contribution of BLM and USFS management, the current Surface Management Agency geospatial data layer will be used to differentiate the amount of change for each management agency for these two measures in the geographic areas of interest. This information will be used to answer Question 5 of the National Planning Strategy Effectiveness Report.

Answers to the five questions for determining the effectiveness of the national planning strategy will identify areas that appear to be meeting the objectives of the strategy and will facilitate identification of population areas for more detailed analysis. Conceptually, if the broad-scale monitoring identifies increasing sagebrush availability and improving vegetation conditions, decreasing disturbance, and a stable or increasing population for the area of interest, there is evidence that the objectives of the national planning strategy to maintain populations and their habitats have been met. Conversely, where information indicates that sagebrush is decreasing and vegetation conditions are degrading, disturbance in sage-grouse areas is increasing, and/or

populations are declining relative to the baseline, there is evidence that the objectives of the national planning strategy are not being achieved. Such a determination would likely result in a more detailed analysis and could be the basis for implementing more restrictive adaptive management measures.

With respect to the land use plan area, the BLM and the USFS will summarize the vegetation, disturbance, and population data to determine if the LUP is meeting the plan objectives. Effectiveness information used for these evaluations includes BLM/USFS surface management areas and will help inform where finer-scale evaluations are needed, such as seasonal habitats, corridors, or linkage areas. Data will also include the trend of disturbance within the sage-grouse areas, which will inform the need to initiate adaptive management responses as described in the land use plan.

*Calculating Question 1, Land Use Plan Effectiveness:* The condition of vegetation and the allotments meeting land health standards (as articulated in “BLM Handbook 4180-1, Rangeland Health Standards”) in sage-grouse areas will be used to determine the LUP’s effectiveness in meeting the vegetation objectives for sage-grouse habitat set forth in the plan. The field office/ranger district will be responsible for collecting this data. In order for this data to be consistent and comparable, common indicators, consistent methods, and an unbiased sampling framework will be implemented following the principles in the BLM’s AIM strategy (Taylor et al. 2014; Toevs et al. 2011; MacKinnon et al. 2011), in the BLM’s Technical Reference “Interpreting Indicators of Rangeland Health” (Pellant et al. 2005), and in the HAF (Stiver et al. *in press*) or other approved WAFWA MZ-consistent guidance to measure and monitor sage-grouse habitats. This information will be used to answer Question 1 of the Land Use Plan Effectiveness Report.

*Calculating Question 2, Land Use Plan Effectiveness:* Sage-grouse areas within the LUP that are achieving land health stands (or, if trend data are available, that are making progress toward achieving them)—particularly the Special Status Species/wildlife habitat land health standard—will be used to determine the LUP’s effectiveness in achieving the habitat objectives set forth in the plan. Field offices will follow directions in “BLM Handbook 4180-1, Rangeland Health Standards,” to ascertain if sage-grouse areas are achieving or making progress toward achieving land health standards. One of the recommended criteria for evaluating this land health standard is the HAF indicators.

*Calculating Question 3, Land Use Plan Effectiveness:* The amount of habitat disturbance in sage-grouse areas identified in this LUP will be used to determine the LUP’s effectiveness in meeting the plan’s disturbance objectives. National datasets can be used to calculate the amount of disturbance, but field office data will likely increase the accuracy of this estimate. This information will be used to answer Question 3 of the Land Use Plan Effectiveness Report.

*Calculating Question 4, Land Use Plan Effectiveness:* The change in estimated sage-grouse populations will be calculated from data provided by the state wildlife agencies, when available, and will be used to determine LUP effectiveness. This population data (Section I.C., Population [Demographics] Monitoring) will be used to answer Question 4 of the Land Use Plan Effectiveness Report.

Results of the effectiveness monitoring process for the LUP will be used to inform the need for finer-scale investigations, initiate adaptive management actions as described in the land use plan, initiate causation determination, and/or determine if changes to management decisions are warranted. The measures used at the broad and mid scales will provide a suite of characteristics for evaluating the effectiveness of the adaptive management strategy.

## **II. FINE AND SITE SCALES**

Fine-scale (third-order) habitat selected by sage-grouse is described as the physical and geographic area within home ranges during breeding, summer, and winter periods. At this level, habitat suitability monitoring should address factors that affect sage-grouse use of, and movements between, seasonal use areas. The habitat monitoring at the fine and site scale (fourth order) should focus on indicators to describe seasonal home ranges for sage-grouse associated with a lek or lek group within a population or subpopulation area. Fine- and site-scale monitoring will inform LUP effectiveness monitoring (see Section I.D., Effectiveness Monitoring) and the hard and soft triggers identified in the LUP's adaptive management section.

Site-scale habitat selected by sage-grouse is described as the more detailed vegetation characteristics of seasonal habitats. Habitat suitability characteristics include canopy cover and height of sagebrush and the associated understory vegetation. They also include vegetation associated with riparian areas, wet meadows, and other mesic habitats adjacent to sagebrush that may support sage-grouse habitat needs during different stages in their annual cycle.

As described in the Conclusion (Section III), details and application of monitoring at the fine and site scales will be described in the implementation-level monitoring plan for the land use plan. The need for fine- and site-scale-specific habitat monitoring will vary by area, depending on proposed projects, existing conditions, habitat variability, threats, and land health. Examples of fine- and site-scale monitoring include: habitat vegetation monitoring to assess current habitat conditions; monitoring and evaluation of the success of projects targeting sage-grouse habitat enhancement and/or restoration; and habitat disturbance monitoring to provide localized disturbance measures to inform proposed project review and potential mitigation for project impacts. Monitoring plans should incorporate the principles outlined in the BLM's AIM strategy (Toevs et al. 2011) and in "AIM-Monitoring: A Component of the Assessment, Inventory, and Monitoring Strategy" (Taylor et al. 2014). Approved monitoring methods are:



- “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011);
- The BLM’s Technical Reference “Interpreting Indicators of Rangeland Health” (Pellant et al. 2005); and,
- “Sage-Grouse Habitat Assessment Framework: Multiscale Assessment Tool” (Stiver et al. *in press*).

Other state-specific disturbance tracking models include: the BLM’s Wyoming Density and Disturbance Calculation Tool (<http://ddct.wygisc.org/>) and the BLM’s White River Data Management System in development with the USGS. Population monitoring data (in cooperation with state wildlife agencies) should be included during evaluation of the effectiveness of actions taken at the fine and site scales.

Fine- and site-scale sage-grouse habitat suitability indicators for seasonal habitats are identified in the HAF. The HAF has incorporated the Connelly et al. (2000) sage-grouse guidelines as well as many of the core indicators in the AIM strategy (Toevs et al. 2011). There may be a need to develop adjustments to height and cover or other site suitability values described in the HAF; any such adjustments should be ecologically defensible. To foster consistency, however, adjustments to site suitability values at the local scale should be avoided unless there is strong, scientific justification for making those adjustments. That justification should be provided. WAFWA MZ adjustments must be supported by regional plant productivity and habitat data for the floristic province. If adjustments are made to the site-scale indicators, they must be made using data from the appropriate seasonal habitat designation (breeding/nesting, brood-rearing, winter) collected from sage-grouse studies found in the relevant area and peer-reviewed by the appropriate wildlife management agency(ies) and researchers.

When conducting land health assessments, the BLM should follow, at a minimum, “Interpreting Indicators of Rangeland Health” (Pellant et al. 2005) and the “BLM Core Terrestrial Indicators and Methods” (MacKinnon et al. 2011). For assessments being conducted in sage-grouse designated management areas, the BLM should collect additional data to inform the HAF indicators that have not been collected using the above methods. Implementation of the principles outlined in the AIM strategy will allow the data to be used to generate unbiased estimates of condition across the area of interest; facilitate consistent data collection and rollup analysis among management units; help provide consistent data to inform the classification and interpretation of imagery; and provide condition and trend of the indicators describing sagebrush characteristics important to sage-grouse habitat (see Section I.D., Effectiveness Monitoring).

### III. CONCLUSION

This Greater Sage-Grouse Monitoring Framework was developed for all of the Final Environmental Impact Statements involved in the sage-grouse planning effort. As such, it describes the monitoring activities at the broad and mid scales and provides a guide for the BLM and the USFS to collaborate with partners/other agencies to develop the land use plan- specific monitoring plan.

### IV. THE GREATER SAGE-GROUSE DISTURBANCE AND MONITORING SUBTEAM MEMBERSHIP

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**Attachment A. An Overview of Monitoring Commitments**

	Broad and Mid Scales					Fine and Site Scales
	Implementation	Sagebrush Availability	Habitat Degradation	Population	Effectiveness	
<b>How will the data be used?</b>	Track and document implementation of land use plan decisions and inform adaptive management	Track changes in land cover (sagebrush) and inform adaptive management	Track changes in disturbance (threats) to sage-grouse habitat and inform adaptive management	Track trends in sage-grouse populations (and/or leks; as determined by state wildlife agencies) and inform adaptive management	Characterize the relationship among disturbance, implementation actions, and sagebrush metrics and inform adaptive management	Measure seasonal habitat, connectivity at the fine scale, and habitat conditions at the site scale, calculate disturbance, and inform adaptive management
<b>Who is collecting the data?</b>	BLM FO and USFS Forest	NOC and NIFC	National datasets (NOC), BLM FOs, and USFS Forests as applicable	State wildlife agencies through WAFWA	Comes from other broad- and mid-scale monitoring types, analyzed by the NOC	BLM FO and SO, USFS Forests and RO (with partners)
<b>How often are the data collected, reported, and made available to USFWS?</b>	Collected and reported annually; summary report every 5 years	Updated and changes reported annually; summary report every 5 years	Collected and changes reported annually; summary report every 5 years	State data reported annually per WAFWA MOU; summary report every 5 years	Collected and reported every 5 years (coincident with LUP evaluations)	Collection and trend analysis ongoing, reported every 5 years or as needed to inform adaptive management
<b>What is the spatial scale?</b>	Summarized by LUP with flexibility for reporting by other units	Summarized by PACs (size dependent) with flexibility for reporting by other units	Summarized by PACs (size dependent) with flexibility for reporting by other units	Summarized by PACs (size dependent) with flexibility for reporting by other units	Summarized by MZ and LUP with flexibility for reporting by other units (e.g., PAC)	Variable (e.g., projects and seasonal habitats)
<b>What are the potential personnel and budget impacts?</b>	Additional capacity or re-prioritization of ongoing monitoring work and budget realignment	At a minimum, current skills and capacity must be maintained; data management costs are TBD	At a minimum, current skills and capacity must be maintained; data layer purchase cost are TBD	No additional personnel or budget impacts for the BLM or the USFS	Additional capacity or re-prioritization of ongoing monitoring work and budget realignment	Additional capacity or re-prioritization of ongoing monitoring work and budget realignment



<b>Who has primary and secondary responsibilities for reporting?</b>	1) BLM FO & SO; USFS Forest & RO 2) BLM & USFS Planning	1) NOC 2) WO	1) NOC 2) BLM SO, USFS RO, & appropriate programs	1) WAFWA & state wildlife agencies 2) BLM SO, USFS RO, NOC	1) Broad and mid scale at the NOC, LUP at BLM SO, USFS RO	1) BLM FO & USFS Forests 2) BLM SO & USFS RO
<b>What new processes/tools are needed?</b>	National implementation datasets and analysis tools	Updates to national land cover data	Data standards and rollup methods for these data	Standards in population monitoring (WAFWA)	Reporting methodologies	Data standards data storage; and reporting

FO (field office); NIFC (National Interagency Fire Center); NOC (National Operations Center); RO (regional office); SO (state office); TBD (to be determined); WO (Washington Office)

**Attachment B.** User and Producer Accuracies for Aggregated Ecological Systems within LANDFIRE Map Zones

<b>LANDFIRE Map Zone Name</b>	<b>User Accuracy</b>	<b>Producer Accuracy</b>	<b>% of Map Zone within Historical Schroeder</b>
Wyoming Basin	76.9%	90.9%	98.5%
Snake River Plain	68.8%	85.2%	98.4%
Missouri River Plateau	57.7%	100.0%	91.3%
Grand Coulee Basin of the Columbia Plateau	80.0%	80.0%	89.3%
Wyoming Highlands	75.3%	85.9%	88.1%
Western Great Basin	69.3%	75.4%	72.9%
Blue Mountain Region of the Columbia Plateau	85.7%	88.7%	72.7%
Eastern Great Basin	62.7%	80.0%	62.8%
Northwestern Great Plains	76.5%	92.9%	46.3%
Northern Rocky Mountains	72.5%	89.2%	42.5%
Utah High Plateaus	81.8%	78.3%	41.5%
Colorado Plateau	65.3%	76.2%	28.8%
Middle Rocky Mountains	78.6%	73.3%	26.4%
Cascade Mountain Range	57.1%	88.9%	17.3%
Sierra Nevada Mountain Range	0.0%	0.0%	12.3%
Northwestern Rocky Mountains	66.7%	60.0%	7.3%
Southern Rocky Mountains	58.6%	56.7%	7.0%
Northern Cascades	75.0%	75.0%	2.6%
Mogollon Rim	66.7%	100.0%	1.7%
Death Valley Basin	0.0%	0.0%	1.2%

There are two anomalous map zones with 0% user and producer accuracies, attributable to no available reference data for the ecological systems of interest.

**User accuracy** is a map-based accuracy that is computed by looking at the reference data for a class and determining the percentage of correct predictions for these samples. For example, if I select any sagebrush pixel on the classified map, what is the probability that I'll be standing in a sagebrush stand when I visit that pixel location in the field? **Commission Error** equates to including a pixel in a class when it should have been excluded (i.e., commission error =  $1 - \text{user's accuracy}$ ).

**Producer accuracy** is a reference-based accuracy that is computed by looking at the predictions produced for a class and determining the percentage of correct predictions. In other words, if I know that a particular area is sagebrush (I've been out on the ground to check), what is the probability that the digital map will correctly identify that pixel as sagebrush? **Omission Error** equates to excluding a pixel that should have been included in the class (i.e., omission error =  $1 - \text{producer's accuracy}$ ).

**Attachment C.** Sagebrush Species and Subspecies Included in the Selection Criteria for Building the EVT and BpS Layers

- *Artemisia arbuscula* subspecies *longicaulis*
- *Artemisia arbuscula* subspecies *longiloba*
- *Artemisia bigelovii*
- *Artemisia nova*
- *Artemisia papposa*
- *Artemisia pygmaea*
- *Artemisia rigida*
- *Artemisia spinescens*
- *Artemisia tripartita* subspecies *rupicola*
- *Artemisia tripartita* subspecies *tripartita*
- *Tanacetum nuttallii*
- *Artemisia cana* subspecies *bolanderi*
- *Artemisia cana* subspecies *cana*
- *Artemisia cana* subspecies *viscidula*
- *Artemisia tridentata* subspecies *wyomingensis*
- *Artemisia tridentata* subspecies *tridentata*
- *Artemisia tridentata* subspecies *vaseyana*
- *Artemisia tridentata* subspecies *spiciformis*
- *Artemisia tridentata* subspecies *xericensis*
- *Artemisia tridentata* variety *pauciflora*
- *Artemisia frigida*
- *Artemisia pedatifida*

## Appendix F – Idaho Key Habitat Map Update Process and Provisions for Addressing GRSG documented in New Areas Outside Priority, Important and General Habitat Management Areas

### Modifications to Priority, Important and General Habitat Management Areas:

The BLM and FS have worked closely with the State of Idaho and USFWS in using the best available science to delineate GRSG occupancy in Idaho to the extent possible, as reflected in the boundaries of the Priority, Important and General Habitat Management Areas (PHMA, IHMA, GHMA) identified in this Plan. These management areas will be reviewed and updated approximately every 5 years. Prior to a specific 5-year update, however, it is possible that due to progress toward conservation and habitat restoration, vegetation succession or new information arising from scientific studies or targeted surveys, additional areas of occupied GRSG habitat may be identified, occurring outside the three management areas. Such new areas of occupancy must be based on sound science (e.g., telemetry, formal habitat assessments documenting GRSG usage etc.) and represent an occupied seasonal habitat. They must not be based solely on random or occasional observations of GRSG. In these areas GRSG habitat on BLM and/or FS lands will be managed in accordance with Required Design Features, seasonal restrictions and/or BMPs deemed appropriate by BLM or FS for that area. During the 5-year map update, formal designation of these new areas as PHMA, IHMA or GHMA will be considered by BLM/FS in coordination with the State of Idaho and USFWS along with other recommendations for modification to existing PHMA, IHMA or GHMA areas.

### Modifications to the Key Habitat Map:

The Idaho GRSG Key habitat map displays several broad vegetation classes relevant to GRSG conservation and habitat restoration, that underlie and help inform the Priority, Important and General Habitat Management Areas. These vegetation classes include Key habitat, perennial grasslands, annual grasslands and conifer encroachment areas, and have been utilized in GRSG conservation in Idaho since 2000.

As directed in IM ID-2013-010, Idaho BLM annually updates the Key Habitat map. The purpose of this Instruction Memorandum (IM) is to request updates to the Idaho Sage-grouse Habitat Planning Map. The update is needed to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. This update is also intended to capture additional edits recommended by the field offices, sage-grouse Local Working Groups (LWG), or agency partners in sage-grouse conservation.

**Factors to Consider During Edits:** The following factors are applicable to land of any ownership status for which the Bureau of Land Management (BLM) data are available, or for which data or other information are provided by non-BLM partners. If such new data are unavailable, or not provided by partners, retain the existing spatial data in the dataset:

1. Wildfires that have occurred in the most recent calendar year fire season on land administered by the BLM and on land not administered by the BLM.
2. Vegetation management projects that have been completed within key habitat or potential restoration areas of sage-grouse planning areas. This includes activities

such as burned area rehabilitation seeding projects, sagebrush thinning/reduction, conifer thinning/reduction, restoration of annual grasslands, new fuel breaks, etc. However, only consider those treatment areas completed and where a change in habitat classification has occurred (e.g., from annual grassland to perennial grassland; perennial grassland to key habitat, etc.). Areas planned for treatment or in the process of treatment (e.g., cheatgrass chemical treatment is completed, but seeding is pending) should not be included until an observed change in habitat category is achieved.

3. Changes in habitat status resulting from vegetation succession, such as perennial grasslands that have transitioned to key habitat due to increased sagebrush cover.
4. Habitat mapping errors or omissions that have been identified in the existing Idaho Sage-grouse Habitat Planning Map and other edits recommended by sage-grouse conservation partners, as appropriate. For this item, it is crucial that BLM field office biologists or an alternate staff specialist coordinate closely with their agency partners, especially the UFSFS and the Idaho Department of Fish and Game (IDFG), to actively solicit and resolve additional suggested edits that we may not be aware of. Those edits must also be incorporated into the respective BLM office's update submission. This is vital to ensure that the update is completed efficiently and as collaboratively as possible.
5. Since the Idaho Sage-grouse Habitat Planning Map is intended for use by all conservation partners in Idaho, it is important that we maintain a seamless coverage across land ownerships. In that regard, when editing, do not clip out BLM (or non-BLM land) on the basis of land ownership. Rather, make edits based on vegetation boundaries only, using the best available information and professional judgment. If you have uncertainties about accuracies for certain areas, document that in the metadata as appropriate.
6. Based on discussions during map updates in recent years, we will again use a 10.0 acre minimum polygon size for wildfires since data are readily available to that scale. For vegetation treatments, we will also use a minimum area of 10 acres. For sagebrush or other vegetation patches (e.g., key habitat, perennial grassland, annual grassland, conifer encroachment), delineate habitat to the extent you have data, recognizing that some offices may have more recent, finer resolution data than others.
7. Areas that have recently burned, for which the field has little or no information as to habitat status, should be classified as "recent burn." Efforts to document the general habitat status in these areas should be made the following field season if possible, in preparation for the next map update. The field may also attribute 2013 fires as perennial grassland or annual grassland, as appropriate.

8. Sage-grouse habitat polygon descriptions relevant to this IM include key habitat, perennial grassland, annual grassland, and conifer encroachment potential restoration areas.
  - o Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year.
  - o Perennial grassland can be reclassified as key habitat once average sagebrush canopy cover is at least 10 percent.
  - o Annual grassland areas may be reclassified as perennial grassland once a restoration, fuels treatment or related project, such as an Emergency Stabilization and Rehabilitation (ES&R) seeding, is considered successful (i.e., seeded perennial species have successfully established).
  - o Conifer encroachment areas may be reclassified as key habitat following treatment of conifers if sagebrush cover is at least 10 percent and there is a perennial understory. They can also be reclassified as perennial grasslands if native perennial herbaceous species are dominant or if an associated restoration seeding is successful.
9. Field offices must ensure that original project-level data utilized in this update, including Global Positioning System data files, spatial, tabular and metadata associated with specific vegetation treatments, restoration projects, ES&R projects, etc., are archived at the field level and readily accessible in the event of future data calls.

## Appendix G – Anthropogenic Disturbance and Adaptive Management

### Part I – Baseline Map and Description of Development

The **biologically significant units (BSUs)** are geographical/spatial areas within Greater Sage-grouse habitat that contains relevant and important habitats which is used as the basis for comparative calculations to support evaluation of changes to habitat. The BSUs include all land ownerships for evaluation, although application of the anthropogenic disturbance cap is specific only to BLM and Forest Service lands. The BSUs are used in the evaluation of anthropogenic disturbance and in the adaptive management habitat trigger.

For the Idaho and Southwestern Montana Greater Sage-Grouse Plan Amendment EIS the biologically significant units are defined as:

*Idaho: All of the modeled nesting<sup>1</sup> and delineated winter habitat, which is based on 2011 data, occurring within Priority and/or Important Habitat Management Areas within individual Conservation Areas<sup>2</sup>*

*Montana: All of the Priority Habitat Management Area*

These BSUs form the geographic basis for the calculation of anthropogenic disturbance and in the soft and hard adaptive management habitat triggers.

While the BSUs define the geographic extent and scale of the Subregion's landscape that will be considered in evaluating anthropogenic disturbance and the adaptive management habitat triggers, how disturbance and habitat triggers are calculated differ since anthropogenic disturbance and habitat loss affect Greater Sage-grouse differently (Knick et al. 2013).

The BSU is the total area (acreage) of nesting and wintering habitat within Priority or Important Habitat Management Areas, separately, by each Conservation Area. For Idaho this results in 8 BSUs, 2 each within the Idaho Conservation Areas – 1 in Priority Habitat Management Areas and 1 in Important Habitat Management Areas. There is 1 BSU in southwest Montana and 1 BSU for the Utah portion of the Sawtooth National Forest (Raft River BSU). There are a total of 10 BSUs within the Idaho and Southwestern Montana Subregion as shown in Map-G-1.

In developing these BSUs it was determined at the subregional level that data from these units must be compatible with aggregation to the PAC and WAFWA Management Zone levels, in order to meet FWS needs. In addition, BSUs must be edge matched/aligned with neighboring states. All sub-regions acknowledge there may be locally important biologically significant units smaller than PACs which may or may not be rolled up to PAC level. The Subregions also acknowledge that assessing disturbance at larger scales such as certain PACs, or via rollup of data, provides a baseline metric for future comparison, but dilution may likely mask disturbance concerns occurring at more local scales.

<sup>1</sup> Modeled nesting habitat is defined as those areas of Priority or Important Habitat Management Areas within 6.2 miles of 2011 active leks.

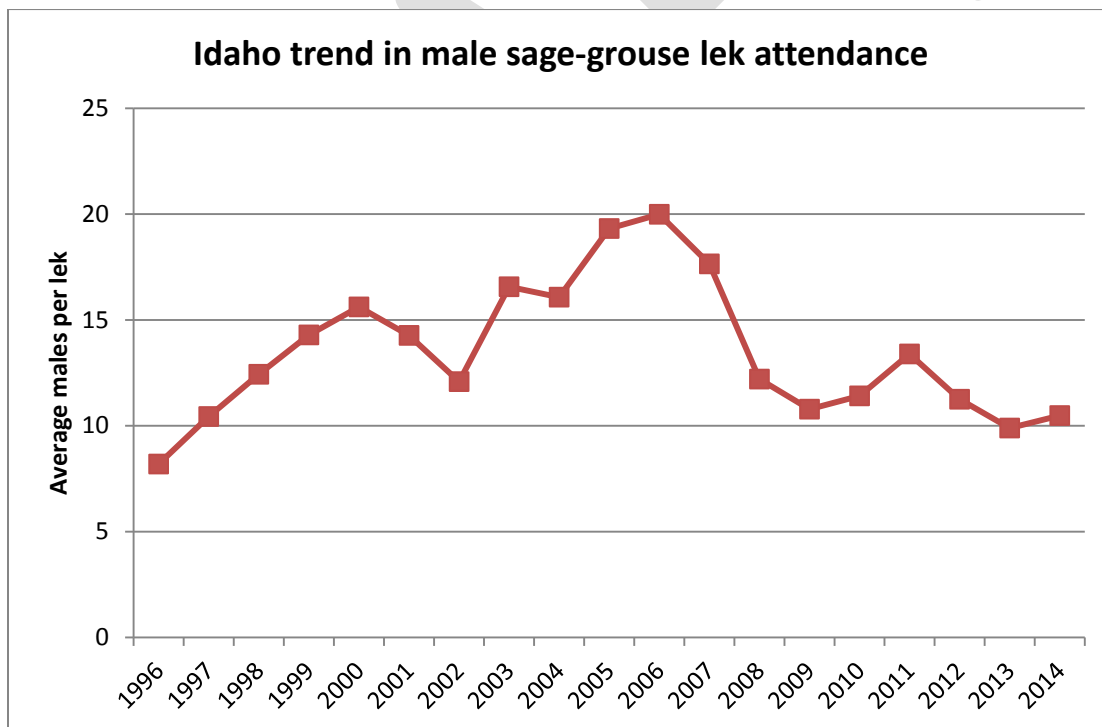
<sup>2</sup> The Utah portion of the Sawtooth National Forest is calculated separately for the Southern Conservation area.



The application of these calculations requires certain assumptions and associated baseline values which set an appropriate benchmark for future comparison.

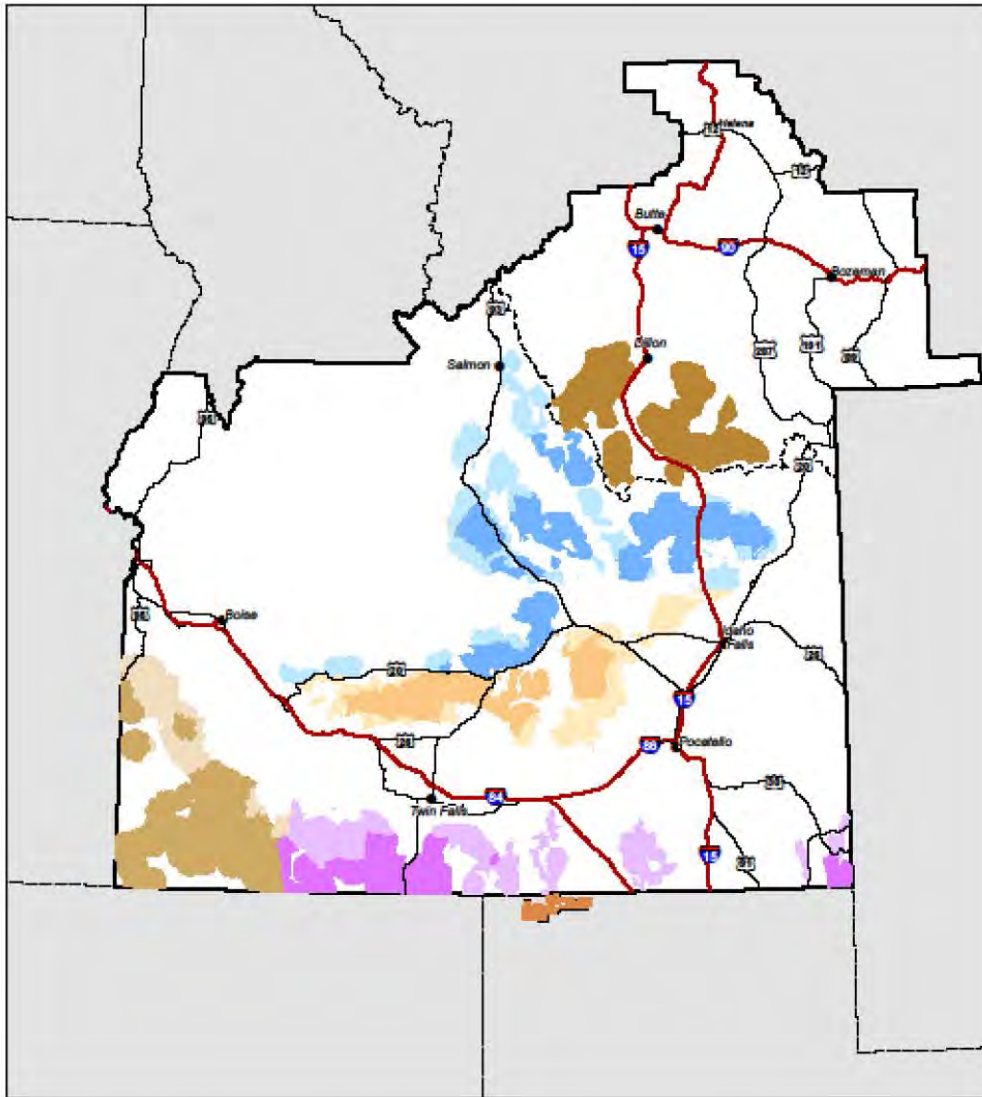
For the adaptive management evaluation in Idaho the baseline year for comparison of both the population and habitat values is set at 2011. Sage-grouse have been monitored by counting males on leks since the 1950's (IDFG files). Average male lek attendance (statewide average) reached a low point in 1996 (IDFG in file). A more consistent and intensified survey of leks began with the annual monitoring of all 78 lek routes across southern Idaho in 1996. Average male lek attendance has fluctuated since 1996 (Figure G-1) in response to favorable or unfavorable conditions (e.g. weather, habitat improvements or loss, and West Nile virus). Peaks were in 2000, 2006, and 2011 with low points in 2002 and 2009. The increase in male lek attendance after previous declines indicates that sage-grouse populations can rebound over a relatively short time frame (e.g. 5 years) given desirable conditions. The baseline was set at the 2011 average number of males because this level is approximately the medium (8 higher and 7 lower years) of the counts between 1996-2011. At the statewide scale, the 2011 baseline allows 10% and 20% population triggers to be above the second lowest point in 2009. Application of the trigger at a smaller (Conservation Area) scale is a more conservative approach that will indicate potential trends sooner than if applied at the state-wide scale.

Figure G-1. Idaho Trend in Male Sage-grouse Lek Attendance.



Map-G-1

**Biologically Significant Unit**



- |  |   |
|--|---|
| Idaho Desert Conservation Area - Core                | Idaho West Owyhee Conservation Area - Core      |
| Idaho Desert Conservation Area - Important           | Idaho West Owyhee Conservation Area - Important |
| Idaho Mountain Valleys Conservation Area - Core      | Raft River - Core                               |
| Idaho Mountain Valleys Conservation Area - Important | SW Montana Conservation Area - Core             |
| Idaho Southern Conservation Area - Core              | Analysis Boundary                               |
| Idaho Southern Conservation Area - Important         |   |

## Part II – Anthropogenic Disturbance Calculation

The specific formula for the percent of anthropogenic disturbance is defined by:

### *Disturbance Percentage*

$$= \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}}{\text{Acres within the BSU} * \left( \frac{\text{Acres of Effective Habitat within the BSU}}{\text{Acres within the BSU}} + 0.3 \right)} \right) \times 100$$

The BSU in the denominator represents the total area (acreage) of the applicable area of analysis. Each BSU is tracked and evaluated separately within each of the 10 BSUs, and reaching the 3% disturbance cap in any one BSU has specific management implications both within and beyond that specific BSU as described in the Proposed Plan.

All sub-regions within the Great Basin Region will use the same types of disturbances for fine/site scale monitoring as were used for broad and mid-scale analysis and would use local data and/or more current satellite imagery if available.

Anthropogenic Disturbance included in the numerator is shown in Table G-1.

Table G-1. Anthropogenic Disturbances and Areas of Impact

Datasets as Described in the Monitoring Framework <sup>3</sup>	Source	Spatial Extent
Oil and Gas Wells and Development Facilities	HIS; BLM (AFMSS)	5.0 ac
Coal Mines	BLM; USFS; Office of Surface Mining Reclamation and Enforcement; USGS Mineral Resource Data System	Polygon Area
Wind Towers	Federal Aviation Administration	3.0 ac
Solar Fields	Platts (power plants)	7.3 ac
Geothermal Development Facilities	IHS	3.0 ac or Polygon Area
Mining (Active Locatable, Leasable and Saleable Developments)	InfoMine	5.0 ac or Polygon Area
Roads <sup>4</sup>	ESRI StreetMap Premium	40.7 ft. (surface streets) 84.0 ft. (major roads) 240.2 ft. (Interstate Hwys.)
Railroads <sup>5</sup>	Federal Railroad Administration	30.8 ft.
Powerlines <sup>6</sup>	Platts	100 ft. (1-199kV)

<sup>3</sup> Taken from Table 6 – GRSG Monitoring Framework.

<sup>4</sup> Values described for line features – roads; railroads; powerlines – represent associated widths centered on the line feature.

<sup>5</sup> See previous note.

<sup>6</sup> See previous note.

Datasets as Described in the Monitoring Framework <sup>3</sup>	Source	Spatial Extent
		150 ft. (200-399kV) 200 ft. (400-699kV) 250 ft. (700+kV)
Communication Towers	Federal Communications Commission	2.5 ac
Other Vertical Structures	Federal Aviation Administration	2.5 ac
Additional Local Datasets (need definitions)		
Underground Pipelines		
Coal Bed Methane Ponds		
Meteorological Towers	BLM; Federal Communications Commission	2.5 ac
Nuclear Energy Facilities	As Available	Polygon Area
Airports	Federal Aviation Administration	Polygon Area
Military Ranges (ground based?)		
Hydropower plants		
Recreation Areas (Developed)	BLM data	Polygon Area

The following data sets would *not* be used to calculate anthropogenic disturbance, but would be used in the habitat baseline to estimate habitat availability or the amount of sagebrush on the landscape within biologically significant units.

1. Habitat treatments
2. Wildfire
3. Invasive plants
4. Conifer encroachment
5. Agriculture
6. Urbanization, Ex-urban and rural development

### ***Travel and Transportation Disturbance in Sage-Grouse Habitat***

The following would count as disturbance (see Part V for definitions):

Linear transportation features identified as roads that have a maintenance intensity of 3 or 5

Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a functional classification and a maintenance intensity of level 3 or 5

### **Non-Disturbance**

The following items would not count as disturbance:

Linear transportation features identified as trails.

Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a maintenance intensity of either level 0 or 1.

Linear transportation features identified as primitive routes.

Linear disturbances.

### *Derivation of the Disturbance Formula -*

There is no definitive and scientifically proven formula to determine impact to GRSG from disturbance described in current research. However, Knick et al. (2013) did describe certain relationships between GRSG and anthropogenic disturbance that have been used, in conjunction with specific assumptions to describe a mathematical relationship between human disturbance footprint, effective GRSG habitat and effects to GRSG.

The variables in the equation are defined as:

- Acres of a Biologically Significant Unit (BSU)
- Acres of Anthropogenic Development within the BSU
- Acres of Effective GRSG Habitat (sagebrush) within the BSU

Knick et al. (2013) defined their unit of comparison (analogous to a biologically significant unit) as an area within 5 km of the lek. Within this area they also found that 79% of this area contained sagebrush (analogous to effective GRSG habitat). Results of the study show that “Ninety-nine percent of active leks were in landscapes with <3% developed”. This shows that when areas within 5 km of a lek containing 79% sagebrush were 3% developed there was a measurable effect on the presence of GRSG – this defines a disturbance threshold of 3% at which point GRSG are affected. Knick et al. developed a habitat similarity relationship between the proportion of leks and percent of sagebrush which shows the highest proportion of leks when sagebrush percentage is between 70-90% (Knick et al. 2013, Figure 5, Connelly et al. 2000, Wisdom ???). Above 90% and below 70% the proportion of leks is reduced. This helps define the optimum range for sagebrush at between 70-90% and also indicates that the disturbance threshold of 3% is also dependent upon and varies with the percent of sagebrush present (effective habitat).

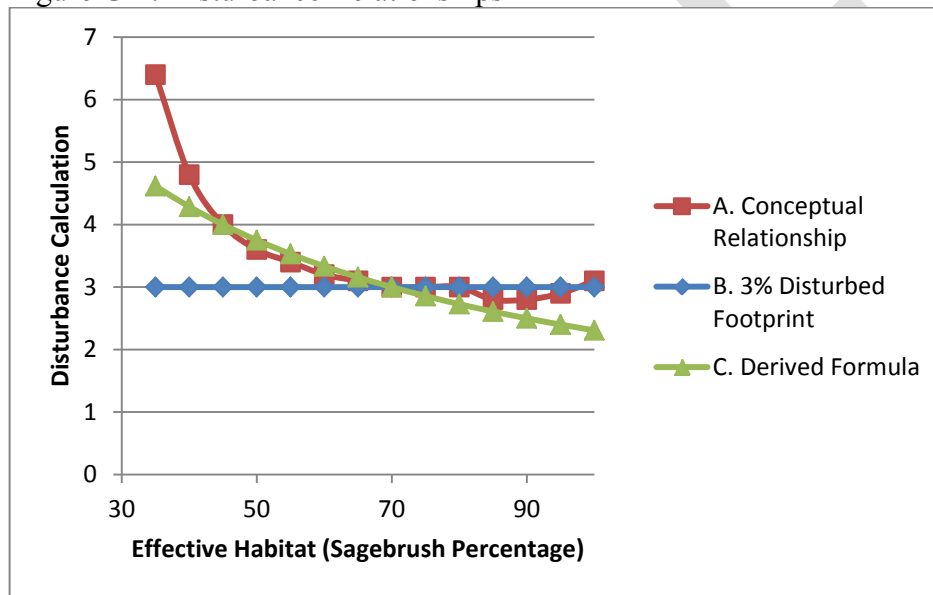
These findings from Knick et al. (2013) help define some mathematical parameters to define a modeled relationship between disturbance, effective habitat and effects to GRSG. Figure G-2 illustrates three different ‘disturbance curves’ that reflect the relationship between disturbance (y-axis) and effective habitat (sagebrush percentage) (x-axis) when the footprint disturbed is equivalent to 3% of the area. The red boxes (A) represent the conceptual relationship between disturbance and effective habitat as described and interpreted from Knick et al. (2013). The blue diamonds (B) represent a simple calculation based only on disturbance footprint, without regard to effective habitat. The green triangles (C) represent the derived formula to model the relationship.

The ‘A’ disturbance curve shows that when the disturbance footprint is 3% of the area and the sagebrush percentage is between 70-90% the disturbance calculation would be 3. When sagebrush percent falls below 70% or rises above 90%, the change in habitat, even without a change in disturbed footprint would begin to affect the presence of GRSG. As the amount of sagebrush declines while disturbance remains the same there would be an increasing effect to GRSG presence. This disturbance curve is conceptual and Knick et al. (2013) does not explicitly define this relationship, although this relationship does reflect numerical the observations described in Knick et al. (2013).

The 'B' disturbance curve is a straight calculation based only on disturbed footprint over a specified area. It does not account for variability of sagebrush percentage, and the only variable is the acres of disturbance. For an area that is 3% disturbed the relationship 'curve' is a flat line at 3, regardless of sagebrush percentage. This 'curve' or calculation would match the conceptual curve when sagebrush percentage is between 70 and 90%. This calculation would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation.

The 'C' disturbance curve models and approximates the conceptual relationship described in Knick et al. (2013). It accounts for changes in effective habitat that would translate into variable effects to GRSG based on loss or gain of habitat. It includes the ability to consider habitat loss such as from fire and to consider habitat gain such as from rehabilitation efforts including conifer removal. The model matched the conceptual relationship in the range of 70% sagebrush and approximates the conceptual relationship in areas with more or less sagebrush cover. The conceptual relationship assumes a more exponential relationship to GRSG effects from loss of habitat, while the derived formula assumes a more linear relationship. There are no available scientific studies that more clearly define the nature of the relationship. The derived formula and the conceptual relationship are substantially similar from 35-90% sagebrush percentage to validate the derived formula's relative approximation of the relationship.

Figure G-2. Disturbance Relationships



#### *Development of the Modeled Formula:*

In order to manage and apply a defined disturbance cap it is necessary to take the findings of the appropriate scientific research and utilize them as appropriately as possible to develop management strategies and evaluation techniques consistent with the management objective. Most scientific research is not completed with the intent to develop specific management objectives or approaches; however, it is through the management approaches that the scientific findings utilized to inform management.

Development of the modeled formula began by describing the simplest relationship of disturbance across a defined area by defining the disturbance percentage as:

$$\% \text{ Disturbance} = \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance}}{\text{Acres within Area of Concern}} \right) * 100$$

This accounts for disturbance, but does not account for changes in effective habitat or sagebrush percentage as described in Knick et al. (2013). To account for effective habitat the formula needs to include a term that adjusts the resulting calculation with regard to effective habitat. This should be reflected as an adjustment to the denominator (acres within area of concern). The denominator would be weighted based on the amount of effective habitat. In mathematical terms this would give a denominator of:

$$(\text{Acres within Area of Concern}) * (\text{Adjustment Based on Effective Habitat})$$

The adjustment term must equal 1.0 when the effective habitat is somewhere between 70-90% as described in Knick et al. (2013). Assuming the adjustment term is related to the relative percentage of sagebrush or effective habitat then the *Adjustment Based on Effective Habitat* could be expressed as:

$$\frac{\text{Acres of Effective Habitat within the Area of Concern}}{\text{Acres within the Area of Concern}}$$

However, this term does not equal 1.0 when effective habitat is less than 100%. In order to meet the requirement of equaling 1.0 a constant must be added. This constant, when added to the percentage calculated in the previous term must equal 1.0 when the *Acres of Effective Habitat within the Area of Concern* is somewhere between 70-90%. In the Idaho and Southwestern Montana Subregional Plan an objective of 70% effective habitat has been defined, which is consistent with Knick et al. (2013). If the objective is 70% then the constant that must be added to this term is 0.3 in order to meet the requirement of equaling 1.0 at 70% effective habitat. This defines the following derived formula that approximates the conceptual relationship described in Knick et al. (2013).

*Disturbance Percentage*

$$= \left( \frac{\text{Footprint Acres from Anthropogenic Disturbance within Area of Concern}}{\text{Acres within the Area of Concern} * \left( \frac{\text{Acres of Effective Habitat within the Area of Concern}}{\text{Acres within the Area of Concern}} + 0.3 \right)} \right) * 100$$

**Scale:**

The particular scale for which this formula is calculated is defined by the Area of Concern. The Knick et al. (2013) used a study area defined by the area within 5 km of an individual lek. The disturbance relationships described previously are applicable at this scale and begin to break down or lose their integrity at greater distances from the lek (18 km). This concern, coupled with limited availability of consistent data across broader areas undermines the reliability and accuracy of the calculation when including areas more distant from the lek.

From a management perspective there is a need to address concerns at the broader scale to help manage those threats before they become a concern at the site specific scale. In Idaho, nesting location data collected by Idaho Department of Fish and Game (IDFG), shows that most nesting habitat occurs

within 6.2 miles (10 km) of the lek. IDFG has also collected telemetry data on GRSG movements and used this data to help define wintering areas. Nesting and wintering areas are the most limited and seasonal habitats in Idaho and additional disturbance in those areas could have impacts to GRSG presence. For these reasons the Area of Concern, referred to as the Biologically Significant Unit have been delineated to include nesting and wintering habitats. This results in areas that include more acres than just those associated within a 5 km area of an individual lek as described by Knick et al. (2013), but that are associated (within 6.2 miles or 10 km) with leks. While the Knick et al. (2013) study did not include winter habitat, because of their relative importance they have also been included as part of the BSU since conceivably disturbances that would cause lek abandonment would also likely cause abandonment or avoidance of other seasonal habitat areas. Using other administratively defined areas not delineated or based on specific GRSG use may undermine the utility and integrity of the disturbance relationship and calculation.

This approach, built upon the findings in Knick et al. (2013), uses those findings to help inform management at a broader scale that would help determine management actions based on disturbance evaluations. Using the BSU as the Area of Concern is a scale larger than described in Knick et al. (2013), but still within the predictive bounds described in that study. The formula can be used to calculate disturbance at the BSU scale to help inform a disturbance cap, and it can also be used at the site or project scale to help inform specific project activities.



### Example 1 – Anthropogenic Disturbance

In the Southern Conservation Area the Priority BSU was delineated to include 784,958 acres and the Important BSU was delineated to include 1,036,455 acres, which represent the acres of the Biologically Significant Unit to be used in the denominator. The acres of Effective Habitat in the Priority BSU are 424,656 and in the Important BSU are 447,497. This sets up two equations – one for Priority Habitat Management Areas and one for Important Habitat Management Areas.

The existing footprint acres of disturbance within the Priority BSU are 17,661 acres and the footprint acres of disturbance within the Important BSU are 12,748 acres.

This gives the following two equations to define the baseline disturbance condition in the BSUs:

$$Priority = \frac{17661}{(784958 * (\frac{424656}{784958}) + 0.3)} * 100$$

$$Or \left( \frac{17661}{784958 * (0.54) + 0.3} \right) * 100$$

$$Or \left( \frac{17661}{784958 * (0.84)} \right) * 100$$

Yielding a percent disturbance in the Priority BSU of 2.68%

$$Important = \frac{12748}{(1036455 * (\frac{447497}{1036455}) + 0.3)} * 100$$

Yielding the percent disturbance in the Important BSU of 1.68%

If by 2015 we project additional development within the Priority BSU to be 2120 acres (a 12% increase) and development within the Important BSU to be 4000 acres (a 30% increase) then the Priority footprint acres becomes 20,161 acres and the Important footprint acres becomes 16,748 acres. The resulting evaluation for this cumulative disturbance is calculated by:

$$Priority = \frac{19781}{(784958 * (\frac{424656}{784958}) + 0.3)} * 100 \quad Important = \frac{16748}{(1036455 * (\frac{447497}{1036455}) + 0.3)} * 100$$

Yielding the percent disturbance as: Priority = 3.00% and Important = 2.21%

In the examples, given the existing disturbance footprint it would require development of an additional 2,120 acres in the Priority BSU and an additional 10,005 acres in the Important BSU before the 3% cap would be engaged.

### Part III - Adaptive Management

#### Adaptive Management Habitat Trigger-

The specific formula for the change in habitat for the habitat trigger is defined by:

Within Idaho and Utah all factors are measured within the modeled nesting and wintering habitat within Priority or Important Habitat Management Areas (calculated separately) by Conservation Area; in Southwest Montana all factors are measured within the Priority Habitat Management Area.

In simple description the adaptive management habitat trigger calculation is the percentage of Effective Habitat (defined as areas of generally intact sagebrush that provide Greater sage-grouse habitat during some portion of the year) within modeled nesting and wintering areas within Priority or Important Habitat Management Areas by Conservation Area within a particular year when compared to the Effective Habitat within modeled nesting and wintering areas within Priority or Important Habitat Management Areas by Conservation Area as of the 2011 baseline. Using Effective Habitat as the metric of comparison removes non-habitat acres from the calculation. The calculation is evaluated within both Priority and Important Habitat Management Areas separately within each of the 10 BSUs.

For purposes of evaluating the adaptive management habitat triggers, Effective Habitat in Idaho is tracked using the Key Habitat Map which is updated annually by BLM in coordination with IDFG, Forest Service, US FWS and Local Working Groups and tracks the areas of generally intact sagebrush providing Greater sage-grouse habitat during some portion of the year. Effective habitat equates to areas described as Key Habitat on the Key Habitat Map. Appendix F contains a description of the Key Habitat Map maintenance and update process including the inclusion of disturbances from fire and temporary disturbances and habitat restoration/rehabilitation. **For Montana and Utah Effective Habitat is based on...**

Factors: EHP(Y) – where Y is the year and EHC is the acres of Effective Habitat for that year within the baseline 2011 nesting and wintering areas within the Priority Habitat Management Area by Conservation Area

EHI(Y) - where Y is the year and EHI is the acres of Effective Habitat for that year within the baseline 2011 nesting and wintering areas within the Important Habitat Management Area by Conservation Area

ADP(Y) – where Y is the year and AD is the acres of anthropogenic disturbance within Effective Habitat for that year within the 2011 nesting and wintering areas within the Priority Habitat Management Area by Conservation Area

ADI(Y) – where Y is the year and AD is the acres of anthropogenic disturbance within Effective Habitat for that year (Y) within the baseline 2011 nesting and wintering areas within the Important Habitat Management Area by Conservation Area

EHP(2011) – the Effective Habitat within the baseline 2011 nesting and wintering areas within the Priority Habitat Management Area by Conservation Area

EHI(2011) - the Effective Habitat within the baseline 2011 nesting and wintering areas within the Important Habitat Management Area by Conservation Area

ADP(2011) – the acres of anthropogenic disturbance within Effective Habitat within the baseline 2011 nesting and wintering areas within the Priority Habitat Management Area by Conservation Area

ADI(2011) – the acres of anthropogenic disturbance within Effective Habitat within the baseline 2011 nesting and wintering areas within the Important Habitat Management Area by Conservation Area

Formulas:

$$\text{Priority Habitat Management Area} = 100 - \left( \frac{EHP(Y) - ADP(Y)}{EHP(2011) - ADP(2011)} \right) * 100$$

$$\text{Important Habitat Management Area} = 100 - \left( \frac{EHI(Y) - ADI(Y)}{EHI(2011) - ADI(2011)} \right) * 100$$

When this calculation equals or exceeds 10 then an adaptive trigger has been engaged as per AM-7 & AM-8.

Tables 2-7 describe the acreages associated with the BSUs by Conservation Area for the Idaho and Southwestern Montana Subregion. The tables contain values for the entire BSU (Priority and Important), including all ownerships, acres of effective habitat within the BSUs and acres of anthropogenic disturbance within the BSUs.

These values will be used to provide several examples applying the anthropogenic disturbance and adaptive management habitat trigger evaluations. These are for illustrative purposes and do not represent an actual evaluation of ground conditions.

### **Example 2 – Adaptive Management – Habitat**

In the Southern Conservation Area the Priority BSU was delineated to include 784,958 acres, of which 424,656 acres were Effective habitat; therefore EHP(2011) is equal to 424,656 acres. Development within the Effective Habitat in 2011 was measured at 10,074 acres; therefore ADP(2011) is equal to 10,074 acres.

If in 2015 we project a cumulative loss of 42,000 Effective habitat acres due to wildfire (10% loss) and an additional 1000 acres of anthropogenic development (10% increase), then

EHP(2015) is equal to 424,656 – 42,000 or 382,656 and ADP(2015) is equal to 10,074+1000 or 11,074. The evaluation for the adaptive management trigger is calculated by:

$$100 - \left( \frac{382656 - 11074}{424656 - 10074} \right) * 100$$

This simplifies to:  $100 - \left( \frac{371582}{414582} \right) * 100$

Or  $100 - (0.896 * 100)$

Or  $100 - 89.6$

Or  $10.4 - \text{equivalent to } 10.4\%$

This evaluation shows a loss of greater than 10 percent and less than 20 percent which would engage the soft habitat trigger as described in AM-8 and not the hard habitat trigger described in AM-7.

### Soft Trigger Considerations and Implementation Actions

The Sage-Grouse Implementation Task Force, in coordination with BLM and Forest Service would utilize monitoring information to assess when triggers have been tripped. When information indicates that the soft habitat or population trigger may have been tripped, a Sage-Grouse Implementation Task Force, in coordination with BLM and Forest Service - aided by the technical expertise of IDF&G - would assess the factor(s) leading to the decline and identify potential management actions. The Sage-Grouse Implementation Task Force may consider and recommend to BLM possible changes in management to the PHMA. As to the IHMA, the Sage-Grouse Implementation Team may review the causes for decline and potential management changes only to the extent those factors significantly impair the state's ability to meet the overall management objective. It is anticipated IDF&G will collect data annually and will make recommendations to the Implementation Team by August 31st for population triggers and January 15th for habitat triggers.

Only where the monitoring information indicates the cause(s) of the decline is not a primary threat will the Sage-Grouse Implementation Task Force analyze the secondary threats to the species and determine whether further management actions are needed.

### Potential Implementation Level Actions to Consider in the Event Soft Trigger Criteria are Met

- ✓ Increase monitoring and evaluation of sage-grouse populations in Priority Habitat Management Area (area of concern).
- ✓ Implement Priority Habitat Management Area management strategy in corresponding Important Habitat Management Area of the same Conservation Area.
- ✓ Implement Priority Habitat Management Area RDFs in corresponding Important Habitat Management Area of the same Conservation Area.

- ✓ Not allow any new (large) infrastructure development within the Priority Habitat Management Area (no exceptions allowed).
- ✓ Reallocate resources to focus on primary threats in the Priority Habitat Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Reallocate resources to focus on secondary threats in the Priority Habitat Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Apply Priority Habitat Management Area criteria for all primary threats, and/or all secondary threats to the Important Habitat Management Area.
- ✓ Reallocate resources to focus on primary threats in the Important Habitat Management Area (e.g. direct resources from other parts of the state to the area of concern).
- ✓ Reallocate resources to focus on secondary threats in the Important Habitat Management Area (e.g. direct resources from other parts of the state to the area of concern).

**If Livestock Grazing is determined to be a Causal Factor Consider the Following Measures:**

1. Employ grazing management systems that ensure adequate nesting and early brood rearing habitat within the breeding landscape.
2. When use-pattern mapping or monitoring demonstrates an opportunity to adjust livestock distribution to benefit occupied sage-grouse breeding habitat, include as appropriate herding, salting, and water-source management (e.g., turning troughs/pipelines on/off, extending pipelines/moving troughs) in grazing programs.
3. If available and feasible, utilize exotic perennial grass seedings and/or annual grasslands to avoid breeding season of use of occupied sage-grouse habitat.
4. Modify authorized seasons of use within grazing permits to provide greater flexibility in managing livestock for the benefit of sage-grouse.
5. Where appropriate, maintain residual herbaceous vegetation at the end of the growing/grazing season to contribute to nesting and brood-rearing habitat during the coming nesting season. Table 5.
6. Insure that permittees are informed of management and movement requirements related to avoidance of recent burns, rehabilitation seedings or other restoration sites.
7. Manage grazing of riparian areas, meadows, springs, and seeps in a manner that promotes vegetative structure and composition appropriate to the site. In some cases enclosure fencing may be a viable option. However, recognize the availability and quality of desired herbaceous species may be improved by periodic grazing use of the enclosure.
8. Implement management actions (grazing decisions, allotment management plan/conservation plan development, or other agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements. Employ proper grazing management by providing flexibility in scheduling the intensity, timing, duration and frequency of grazing use over time that best promotes management objectives. During drought periods, prioritize evaluating effects of drought in the CMA relative to grouse needs for food and cover. Ensure that post-drought management allows for vegetation recovery that meets sage-grouse needs in priority sage-grouse habitat areas.
9. When using salt or mineral supplements: a) place them in existing disturbed sites, areas with reduced sagebrush cover—e.g., seedings or cheatgrass sites—to reduce impacts to sage-grouse breeding habitat, b) where feasible use salts or mineral supplements to improve management of livestock for the benefit of sage-grouse habitat.

10. In general, avoid constructing new fences within 2 km of occupied leks. Where feasible, place new, taller structures, such as corrals, loading facilities, water-storage tanks, windmills, etc., at least 2 km from occupied leks to reduce opportunities for perching raptors. Careful consideration, based on local conditions, should also be given to the placement of new fences or structures near other important seasonal habitats (winter-use areas, movement corridors etc.) to reduce potential impacts.
11. New spring developments in sage-grouse habitat should be designed to maintain or enhance the free-flowing characteristics of springs and wet meadows. Analyze developed springs, seeps and associated pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within priority sage-grouse habitat. Make modifications where necessary, considering impacts to other water users when such considerations are neutral or beneficial to sage-grouse.
12. Ensure that new and existing livestock troughs and open water storage tanks are fitted with ramps to facilitate the use of and escape from troughs by sage-grouse and other wildlife. Do not use floating boards or similar objects, as these are too unstable and are ineffective. Use BMPs to mitigate potential impacts from West Nile virus.
13. When placing new water developments in sage-grouse breeding habitat, choose sites and designs that will provide the greatest enhancement for sage-grouse and sage-grouse habitat.
14. Avoid new water developments in higher quality native breeding/early brood habitats that have not had significant prior grazing use except in situations in which water developments may aid in better livestock distribution across the allotment and will not adversely impact the species.
15. Identify and when feasible, establish strategically located forage reserves focusing on areas unsuitable for sage-grouse habitat restoration or lower priority habitat restoration areas.
16. Monitor for, and treat invasive species associated with, existing range improvements.
17. Consider initiating vegetative manipulation projects where sagebrush canopy cover exceeds optimal characteristics to promote grass and forb understory growth. These projects should only be undertaken where it can be achieved without negatively impacting the species.

### **Adaptive Grazing Management Response**

BLM will individually analyze those allotments and pastures within the relevant Conservation Area. Given limited agency resources, prioritization will be given to areas that have the potential to provide the greatest benefit to sage-grouse. Allocation of resources should be concentrated on allotments within the CMA that have declining sage-grouse populations. Following those permits within the CMA, resources will be further prioritized to allotments within the IMA with breeding habitats that have decreasing lek counts. Sage-grouse populations that are stable or trending upward will be a lower priority for permit renewal and the adaptive assessment process. The assessment/determination process for sage-grouse pursuant to Standard 8 will consider published characteristics of sage-grouse habitat and the Ecological Site Descriptions, existing vegetation, habitat inventories/assessments (Stiver et al. 2010), and where available, state and transition models that describe vegetation and other physical attributes for sage-grouse. The related characteristics within the categories shown below will also be included. These characteristics indicate the ability of a given area to provide sage-grouse habitat.

Category 1: The grazing allotment (or any pasture/significant area therein) has the existing vegetation and existing ecological condition (seral state) to provide sage-grouse habitat

Category 2: The grazing allotment (or any pasture/significant area therein) has the ecological potential to provide sage-grouse habitat.

Where an allotment or pasture meets one of these Categories above, the GRSG Habitat Management Objectives will be incorporated into relevant resource management plans as the desired conditions with the understanding that these desired conditions may not be achievable:

- (a) due to the existing ecological condition, ecological potential or the existing vegetation; or
- (b) due to causal events unrelated to existing livestock grazing.

Allotments will only be managed for the primary seasonal habitat that it has the potential to support. Based on these habitat characteristics, BLM will conduct fine and site scale-habitat assessments to help inform grazing management. Where necessary, a determination of factors causing any failure to achieve the habitat characteristics GRSG HMOs will be conducted at a resolution sufficient to document the habitat condition. This determination will include consideration of local spatial and inter-annual variability. A determination of issues attributable to livestock grazing management shall not result from one year of data at a specific location within an allotment. If the process and conditions outlined above demonstrate that livestock grazing is limiting achievement of the habitat characteristics GRSG HMOs, renewed permits will include measures to achieve desired habitat conditions. These measures must be tailored to address the specific management issues associated with seasonal habitat limitations identified in the fine-scale assessments.

## Part IV – Anthropogenic Disturbance and Adaptive Management 2011 Baseline Indices

### Table G-2 – Desert Conservation Area Baseline Indices

	BLM & FS Acres	Total Acres	Effective Habitat	Existing Anthropogenic Disturbance	
				Within BSU	Within Effective Habitat
<b>Desert Conservation Area</b>					
Priority BSU (nesting and wintering)					
Important BSU (nesting and wintering)					

### Table G-3 – Mountain Valleys Conservation Area Baseline Indices

	BLM & FS Acres	Total Acres	Effective Habitat	Existing Anthropogenic Disturbance	
				Within BSU	Within Effective Habitat
<b>Mountain Valleys Conservation Area</b>					
Priority BSU (nesting and wintering)					
Important BSU (nesting and wintering)					

### Table G-4 – Southern Conservation Area Baseline Indices

	BLM & FS Acres	Total Acres	Effective Habitat	Existing Anthropogenic Disturbance	
				Within BSU	Within Effective Habitat
<b>Southern Conservation Area</b>					
Priority BSU (nesting and wintering)	560,985	784,958	424,656	17,661	10,074
Important BSU (nesting and wintering)	798,691	1,036,455	447,497	12,748	6,289

### Table G-5 – West Owyhee Conservation Area Baseline Indices

	BLM & FS Acres	Total Acres	Effective Habitat	Existing Anthropogenic Disturbance	
				Within BSU	Within Effective Habitat
<b>West Owyhee Conservation Area</b>					
Priority BSU (nesting and wintering)					
Important BSU (nesting and wintering)					



**Table G-6 – Southwest Montana Conservation Area Baseline Indices**

				Existing Anthropogenic Disturbance	
<b>Southwest Montana Conservation Area</b>	BLM & FS Acres	Total Acres	Effective Habitat	Within BSU	Within Effective Habitat
Priority BSU (nesting and wintering)					

**Table G-7 – Raft River (Utah Portion of Sawtooth National Forest)**

				Existing Anthropogenic Disturbance	
<b>Utah portion of Sawtooth National Forest</b>	BLM & FS Acres	Total Acres	Effective Habitat	Within BSU	Within Effective Habitat
Priority BSU (nesting and wintering)					

## Part V - Travel and Transportation Management Definitions for Use in Anthropogenic Disturbance Calculation

**Roads** are linear routes managed for use by low clearance vehicles having four or more wheels, and are maintained for regular and continuous use.

**Primitive Roads** are linear routes managed for use by four-wheel drive or high-clearance vehicles. They do not normally meet any design standards.

**Trails** are linear routes managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

**Linear Disturbances** are human-made linear features that are not part of the designated transportation network are identified as "Transportation Linear Disturbances." These may include engineered (planned) as well as unplanned single and two-track linear features that are not part of the BLM's transportation system.

**Primitive Routes** are any transportation linear feature located within a WSA or lands with wilderness characteristics designated for protection by a land use plan and not meeting the wilderness inventory road definition.

**Temporary routes** are short-term overland roads, primitive roads or trails which are authorized or acquired for the development, construction or staging of a project or event that has a finite lifespan. Temporary routes are not intended to be part of the permanent or designated transportation network and must be reclaimed when their intended purpose(s) has been fulfilled. Temporary routes should be constructed to minimum standards necessary to accommodate the intended use; the intent is that the project proponent (or their representative) will reclaim the route once the original project purpose or need has been completed. Temporary routes are considered emergency, single use or permitted activity access. Unless they are specifically intended to accommodate public use, they should not be made available for that use. A temporary route will be authorized or acquired for the specific time period and duration specified in the written authorization (permit, ROW, lease, contract etc.) and will be scheduled and budgeted for reclamation to prevent further vehicle use and soil erosion from occurring by providing adequate drainage and re-vegetation.

**Administrative routes** are those that are limited to authorized users (typically motorized access). These are existing routes that lead to developments that have an administrative purpose, where the agency or permitted user must have access for regular maintenance or operation. These authorized developments could include such items as power lines, cabins, weather stations, communication sites, spring

### *Maintenance Intensities*

#### **Level 0**

##### Maintenance Description:

Existing routes that will no longer be maintained and no longer be declared a route. Routes identified as Level 0 are identified for removal from the Transportation System entirely.

**Maintenance Objectives:**

- No planned annual maintenance.
- Meet identified environmental needs.
- No preventative maintenance or planned annual maintenance activities.

**Level 1****Maintenance Description:**

Routes where minimum (low intensity) maintenance is required to protect adjacent lands and resource values. These roads may be impassable for extended periods of time.

**Maintenance Objectives:**

- Low (Minimal) maintenance intensity.
- Emphasis is given to maintaining drainage and runoff patterns as needed to protect adjacent lands. Grading, brushing, or slide removal is not performed unless route bed drainage is being adversely affected, causing erosion.
- Meet identified resource management objectives.
- Perform maintenance as necessary to protect adjacent lands and resource values.
- No preventative maintenance.
- Planned maintenance activities limited to environmental and resource protection.
- Route surface and other physical features are not maintained for regular traffic.

**Level 3****Maintenance Description:**

Routes requiring moderate maintenance due to low volume use (for example, seasonally or year-round for commercial, recreational, or administrative access). Maintenance Intensities may not provide year-round access but are intended to generally provide resources appropriate to keep the route in use for the majority of the year.

**Maintenance Objectives:**

- Medium (Moderate) maintenance intensity.
- Drainage structures will be maintained as needed. Surface maintenance will be conducted to provide a reasonable level of riding comfort at prudent speeds for the route conditions and intended use. Brushing is conducted as needed to improve sight distance when appropriate for management uses. Landslides adversely affecting drainage receive high priority for removal; otherwise, they will be removed on a scheduled basis.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

**Level 5**

## Maintenance Description:

Route for high (maximum) maintenance due to year-round needs, high volume of traffic, or significant use. Also may include route identified through management objectives as requiring high intensities of maintenance or to be maintained open on a year-round basis.

## Maintenance Objectives:

- High (Maximum) maintenance intensity.
- The entire route will be maintained at least annually. Problems will be repaired as discovered. These routes may be closed or have limited access due to weather conditions but are generally intended for year-round use.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

## Appendix H – Anthropogenic Disturbance

### Disturbance Density Calculation

#### GRSG Local/Site Disturbance Calculation

- **All sub-regions:** Agreed to use the same types of disturbances for fine/site scale monitoring as were used for broad and mid-scale analysis. Would use local data and/or more current satellite imagery if available. Recognize that site specific data, where available, provide a more accurate measure of land cover, disturbance and conifer encroachment than Landfire. In the long-term, ensure fine/site scale monitoring provides results that can be used across the GRSG range and “rolled up” for reporting purposes. In the short term (<5 years), locally derived vegetation data may not be available or easily rolled up, so use of seamless land cover data such as Sagestitch is recommended.

Great Basin sub-regions agreed to use the same type of data sets as used for broad and mid-scale to monitor local/site level conditions. Supplement with local data where available and/or more accurate. The following data layers or local surrogate would be used.

1. Energy (oil and gas wells and development facilities) Based on local info, actual footprint; see NOC language for certain exceptions.
2. Energy (coal mines) Actual footprint
3. Energy (wind towers) Based on local info, actual footprint
4. Energy (solar fields) Based on local info, actual footprint
5. Energy (geothermal) Based on local info, actual footprint
6. Mining (active developments; locatable, leasable, saleable) Based on local info, actual footprint
7. Infrastructure (roads) actual footprint; see road attachment for specific guidance
8. Infrastructure (railroads) abandoned railroads are NOT a disturbance
9. Infrastructure (power lines) Using NOC guidance, apply these widths:
  - <100 kV: use ROW width
  - 100-199kV: 100 ft
  - 200-399kV: 150 ft
  - 400-699kV: 200 ft
  - 700-799kV: 250 ft
10. Infrastructure (communication towers, fire lookouts, met towers) Based on local info, actual footprint
11. Other developed rights-of-ways

The National Monitoring Framework lists the data sets by threat. These are:

<b>FWS Listing Decision Threat</b>	<b>Sagebrush Habitat Availability</b>	<b>Habitat Degradation (Human Activities)</b>	<b>Density of Energy and Mining Facilities</b>
Agriculture	X		
Urbanization	X		
Wildfire	X		
Conifer encroachment	X		
Treatments	X*		
Invasive Species	X*		
Energy (oil and gas wells and development facilities)		X	X
Energy (coal mines)		X	X
Energy (wind towers)		X	X
Energy (solar fields)		X	X
Energy (geothermal)		X	X
Mining (active locatable, leasable, and salable developments)		X	X
Infrastructure (roads)		X	
Infrastructure (railroads)		X	
Infrastructure (power lines)		X	
Infrastructure (communication towers)		X	
Infrastructure (other vertical structures)		X	
Other developed rights of ways		X*	

The following data sets would *not* be used to calculate anthropogenic disturbance, but would be used in the habitat baseline to estimate habitat availability or the amount of sagebrush on the landscape within biologically significant units. Use best available data, where Landfire or Sagestitch could be used for biophysical setting (bps), compared to existing vegetation type.

1. Habitat treatments
2. Wildfire
3. Invasive plants
4. Conifer encroachment
5. Agriculture
6. Urbanization, Ex-urban and rural development

#### **Biologically Significant Unit:**

- Idaho proposes use of Priority and Important Habitat Management Areas that generally match PACs, but also anticipates assessing disturbance at other scales including nesting and winter habitat, 5 km lek neighborhood, Conservation Areas and/or at the project-scale, depending on need.
- For all subregions, data from these units would be rolled up to the PAC and WAFWA Management Zone, to meet FWS needs. In addition, units must be edge matched/aligned with neighboring states. All sub-regions acknowledge there may be locally important biologically significant units smaller than PACs which may or may not be rolled up to PAC level. The Subregions also acknowledge that assessing disturbance at larger scales such as certain PACs, or via rollup of data, provides a baseline metric for future comparison, but dilution may likely mask disturbance concerns occurring at more local scales.

#### ***Travel and Transportation Disturbance in Sage-Grouse Habitat***

The following would count as disturbance:

- Linear transportation features identified as roads that have a maintenance intensity of 3 or 5
- Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a functional classification and a maintenance intensity of level 3 or 5

#### **Non-Disturbance**

The following items would not count as disturbance:

- Linear transportation features identified as trails.
- Linear transportation features identified as primitive roads, temporary routes, or administrative routes that have a maintenance intensity of either level 0 or 1.

Linear transportation features identified as primitive routes.  
Linear disturbances.

DRAFT



### *Travel and Transportation Management Definitions*

**Roads** are linear routes managed for use by low clearance vehicles having four or more wheels, and are maintained for regular and continuous use.

**Primitive Roads** are linear routes managed for use by four-wheel drive or high-clearance vehicles. They do not normally meet any design standards.

**Trails** are linear routes managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

**Linear Disturbances** are human-made linear features that are not part of the designated transportation network are identified as "Transportation Linear Disturbances." These may include engineered (planned) as well as unplanned single and two-track linear features that are not part of the BLM's transportation system.

**Primitive Routes** are any transportation linear feature located within a WSA or lands with wilderness characteristics designated for protection by a land use plan and not meeting the wilderness inventory road definition.

**Temporary routes** are short-term overland roads, primitive roads or trails which are authorized or acquired for the development, construction or staging of a project or event that has a finite lifespan. Temporary routes are not intended to be part of the permanent or designated transportation network and must be reclaimed when their intended purpose(s) has been fulfilled. Temporary routes should be constructed to minimum standards necessary to accommodate the intended use; the intent is that the project proponent (or their representative) will reclaim the route once the original project purpose or need has been completed. Temporary routes are considered emergency, single use or permitted activity access. Unless they are specifically intended to accommodate public use, they should not be made available for that use. A temporary route will be authorized or acquired for the specific time period and duration specified in the written authorization (permit, ROW, lease, contract etc.) and will be scheduled and budgeted for reclamation to prevent further vehicle use and soil erosion from occurring by providing adequate drainage and re-vegetation.

**Administrative routes** are those that are limited to authorized users (typically motorized access). These are existing routes that lead to developments that have an administrative purpose, where the agency or permitted user must have access for regular maintenance or operation. These authorized developments could include such items as power lines, cabins, weather stations, communication sites, spring

### *Maintenance Intensities*

#### **Level 0**

##### Maintenance Description:

Existing routes that will no longer be maintained and no longer be declared a route. Routes identified as Level 0 are identified for removal from the Transportation System entirely.

##### Maintenance Objectives:

- No planned annual maintenance.
- Meet identified environmental needs.
- No preventative maintenance or planned annual maintenance activities.

### **Level 1**

#### Maintenance Description:

Routes where minimum (low intensity) maintenance is required to protect adjacent lands and resource values. These roads may be impassable for extended periods of time.

#### Maintenance Objectives:

- Low (Minimal) maintenance intensity.
- Emphasis is given to maintaining drainage and runoff patterns as needed to protect adjacent lands. Grading, brushing, or slide removal is not performed unless route bed drainage is being adversely affected, causing erosion.
- Meet identified resource management objectives.
- Perform maintenance as necessary to protect adjacent lands and resource values.
- No preventative maintenance.
- Planned maintenance activities limited to environmental and resource protection.
- Route surface and other physical features are not maintained for regular traffic.

### **Level 3**

#### Maintenance Description:

Routes requiring moderate maintenance due to low volume use (for example, seasonally or year-round for commercial, recreational, or administrative access). Maintenance Intensities may not provide year-round access but are intended to generally provide resources appropriate to keep the route in use for the majority of the year.

#### Maintenance Objectives:

- Medium (Moderate) maintenance intensity.
- Drainage structures will be maintained as needed. Surface maintenance will be conducted to provide a reasonable level of riding comfort at prudent speeds for the route conditions and intended use. Brushing is conducted as needed to improve sight distance when appropriate for management uses. Landslides adversely affecting drainage receive high priority for removal; otherwise, they will be removed on a scheduled basis.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

### **Level 5**

#### Maintenance Description:

Route for high (maximum) maintenance due to year-round needs, high volume of traffic, or significant use. Also may include route identified through management objectives as requiring high intensities of maintenance or to be maintained open on a year-round basis.

Maintenance Objectives:

- High (Maximum) maintenance intensity.
- The entire route will be maintained at least annually. Problems will be repaired as discovered. These routes may be closed or have limited access due to weather conditions but are generally intended for year-round use.
- Meet identified environmental needs.
- Generally maintained for year-round traffic.
- Perform annual maintenance necessary to protect adjacent lands and resource values.
- Perform preventative maintenance as required to generally keep the route in acceptable condition.
- Planned maintenance activities should include environmental and resource protection efforts, annual route surface.
- Route surface and other physical features are maintained for regular traffic.

## Appendix J – Mitigation

### Part I – Regional Mitigation Strategy

The BLM/USFS will achieve no net unmitigated loss for authorized land uses within greater sage-grouse priority and general habitat. No net unmitigated loss means that impacts from authorized land uses will be fully offset to benefit the species. Mitigation will follow the regulations from the White House Council on Environmental Quality (CEQ) (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy. If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures (i.e. residual impacts), then compensatory mitigation projects will be used to fully offset those residual impacts in order to achieve the no net unmitigated loss standard. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation (see glossary).

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy that will inform the NEPA decision making process including the application of the mitigation hierarchy to address impacts within that Zone. A robust and transparent Regional Mitigation Strategy will contribute to greater sage-grouse habitat conservation by reducing, eliminating, or minimizing threats and compensating for residual impacts to greater sage-grouse and its habitat.

The BLM's Regional Mitigation Manual MS-1794 serves as a framework for developing and implementing a Regional Mitigation Strategy. The following sections provide additional guidance specific to the development and implementation of a WAFWA Management Zone Regional Mitigation Strategy.

#### Developing a WAFWA Management Zone Regional Mitigation Strategy

The BLM/USFS, via the WAFWA Management Zone Greater Sage-Grouse Conservation Team, will develop a WAFWA Management Zone Regional Mitigation Strategy to guide the application of the mitigation hierarchy to address impacts within that Zone. The Strategy should consider any State-level greater sage-grouse mitigation guidance that is consistent with the requirements identified in this Appendix. The Regional Mitigation Strategy should be developed in a transparent manner, based on the best science available and standardized metrics.

As described in Chapter 2, the BLM/USFS will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team (hereafter, Team) to help guide the conservation of greater sage-grouse, within 90 days of the issuance of the Record of Decision. The Strategy will be developed within one year of the issuance of the Record of Decision.

The Regional Mitigation Strategy should include mitigation guidance on avoidance, minimization, and compensation, as follows:

- Avoidance

- Include avoidance areas (e.g. right-of-way avoidance/exclusion areas, no surface occupancy areas) already included in laws, regulations, policies, and/or land use plans (e.g. Resource Management Plans, Forest Plans, State Plans); and,
- Include any potential, additional avoidance actions (e.g. additional avoidance best management practices) with regard to greater sage-grouse conservation.
- Minimization
  - Include minimization actions (e.g. required design features, best management practices) already included in laws, regulations, policies, land use plans, and/or land-use authorizations; and,
  - Include any potential, additional minimization actions (e.g. additional minimization best management practices) with regard to greater sage-grouse conservation.
- Compensation
  - Include discussion of impact/project valuation, compensatory mitigation options, siting, compensatory project types and costs, monitoring, reporting, and program administration. Each of these topics is discussed in more detail below.
    - Residual Impact and Compensatory Mitigation Project Valuation Guidance
      - A common standardized method should be identified for estimating the value of the residual impacts and value of the compensatory mitigation projects.
      - This method should consider the quality of habitat, scarcity of the habitat, and the size of the impact/project.
      - For compensatory mitigation projects, consideration of durability (see glossary), timeliness (see glossary), and the potential for failure may require an upward adjustment of the valuation.
      - The resultant compensatory mitigation project will, after application of the above guidance, result in proactive conservation measures for Greater Sage-grouse (consistent with BLM Manual 6840 – Special Status Species Management, section .02).
    - Compensatory Mitigation Options
      - Options for implementing compensatory mitigation should be identified, such as:
        - Utilizing certified mitigation/conservation bank or credit exchanges.
        - Contributing to an existing mitigation/conservation fund.
        - Authorized-user conducted mitigation projects.
      - For any compensatory mitigation project, the investment must be additional (i.e. additionality: the conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project).
    - Compensatory Mitigation Siting
      - Sites should be in areas that have the potential to yield the greatest conservation benefit to the greater sage-grouse, regardless of land ownership.
      - Sites should be durable (see glossary).
      - Sites identified by existing plans and strategies (e.g. fire restoration plans, invasive species strategies, healthy land focal areas) should be

considered, if those sites have the potential to yield the greatest benefit to greater sage-grouse and are durable.

- Compensatory Mitigation Project Types and Costs
  - Project types should be identified that help reduce threats to greater sage-grouse (e.g. protection, conservation, and restoration projects).
  - Each project type should have a goal and measurable objectives.
  - Each project type should have associated monitoring and maintenance requirements, for the duration of the impact.
  - To inform contributions to a mitigation/conservation fund, expected costs for these project types (and their monitoring and maintenance), within the WAFWA Management Zone, should be identified.
- Compensatory Mitigation Compliance and Monitoring
  - Mitigation projects should be inspected to ensure they are implemented as designed, and if not, there should be methods to enforce compliance.
  - Mitigation projects should be monitored to ensure that the goals and objectives are met and that the benefits are effective for the duration of the impact.
- Compensatory Mitigation Reporting
  - Standardized, transparent, scalable, and scientifically-defensible reporting requirements should be identified for mitigation projects.
  - Reports should be compiled, summarized, and reviewed in the WAFWA Management Zone in order to determine if greater sage-grouse conservation has been achieved and/or to support adaptive management recommendations.
- Compensatory Mitigation Program Implementation Guidelines
  - Guidelines for implementing the State-level compensatory mitigation program should include holding and applying compensatory mitigation funds, operating a transparent and credible accounting system, certifying mitigation credits, and managing reporting requirements.

### Incorporating the Regional Mitigation Strategy into Land Use Authorization Analyses

The BLM/USFS will include the avoidance, minimization, and compensatory recommendations from the Regional Mitigation Strategy in one or more of the NEPA analysis' alternatives for authorized land uses that may impact greater sage-grouse or its habitat.

### Implementing a Compensatory Mitigation Program

The BLM/USFS need to ensure that compensatory mitigation is strategically implemented to achieve the greatest conservation benefit, as identified in the Regional Mitigation Strategy. In order to align with existing compensatory mitigation efforts, this compensatory mitigation program will be managed at a State-level (as opposed to a WAFWA Management Zone, a Field Office, or a Forest), in collaboration with our partners (e.g. Federal, Tribal, and State agencies).

To ensure transparent and effective management of the compensatory mitigation funds, the BLM/USFS will enter into a contract or agreement with a third-party to help manage the State-level compensatory mitigation funds, within one year of the issuance of the Record of Decision. The selection of the third-party compensatory mitigation administrator will conform to all relevant laws, regulations, and policies. The BLM/USFS will remain responsible for making decisions that affect Federal lands.

## Glossary Terms

**Additionality:** The conservation benefits of compensatory mitigation are demonstrably new and would not have resulted without the compensatory mitigation project. (BLM Manual Section 1794).

**Avoidance mitigation:** Avoiding the impact altogether by not taking a certain action or parts of an action. (40 CFR 1508.20(a)) (e.g. may also include avoiding the impact by moving the proposed action to a different time or location.)

**Compensatory mitigation:** Compensating for the (residual) impact by replacing or providing substitute resources or environments. (40 CFR 1508.20)

**Compensatory mitigation projects:** Specific, on-the-ground actions to improve and/or protect habitats (e.g. chemical vegetation treatments, land acquisitions, conservation easements).

**Compensatory mitigation sites:** The durable areas where compensatory mitigation projects will occur.

**Durability (protective and ecological):** The administrative, legal, and financial assurances that secure and protect the conservation status of a compensatory mitigation site, and the ecological benefits of a compensatory mitigation project, for at least as long as the associated impacts persist. (BLM Manual Section 1794).

**Minimization mitigation:** Minimizing impacts by limiting the degree or magnitude of the action and its implementation. (40 CFR 1508.20 (b))

**Residual impacts:** Impacts from an authorized land use that remain after applying avoidance and minimization mitigation; also referred to as unavoidable impacts.

**Timeliness:** The conservation benefits from compensatory mitigation accruing as early as possible or before impacts have begun. (BLM Manual Section 1794).

## Part II – Idaho Mitigation Framework

### FRAMEWORK FOR MITIGATION OF IMPACTS FROM INFRASTRUCTURE PROJECTS ON SAGE-GROUSE AND THEIR HABITATS

Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse State Advisory Committee<sup>1</sup>  
December 6, 2010

#### INTRODUCTION

The Conservation Plan for Greater Sage-grouse in Idaho (Idaho Sage-Grouse Advisory Committee 2006; as amended in 2009) calls for the development of a “proposal for a mitigation and crediting program for sagebrush steppe habitats in Idaho and recommendations for policy consideration” (Measure 6.2.4). In early 2010, the Idaho Sage-grouse Advisory Committee (SAC) established the Mitigation Subcommittee to complete this task.<sup>1</sup> The Mitigation Subcommittee met several times from the late spring, through the fall of 2010 and found broad areas of agreement among its diverse participants.

This report presents the Mitigation Subcommittee’s consensus recommendations for the creation of an Idaho-based program to compensate for the impacts of infrastructure projects on sagegrouse and their habitats. This program – called the Mitigation Framework – would serve as a science-based “mitigation module” that project developers and government regulators could use to achieve compensatory mitigation objectives called for in project plans and permits. While compensatory mitigation may help offset certain impacts arising from infrastructure projects, mitigation should not be considered a substitute for first avoiding and then minimizing impacts.

In addition, it is important to recognize that federal and state regulatory or land-management agencies, and county or local governments may also require additional stipulations, conditions of approval or other requirements as well as on-site mitigation, in accordance with applicable law, regulation or policy.

This document proposes a general outline or “skeleton” of policies and procedures for such a program. The Mitigation Framework is designed to be transparent, inclusive, and accountable to defined objectives. The Subcommittee’s purpose is to describe the program in enough detail to foster a dialogue among SAC members, spot important issues and points of agreement, and assess the level of support for developing a functioning mitigation program for Idaho sagegrouse and their habitats.

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<sup>1</sup> Subcommittee participants: John Robison and Lara Rozzelle, Idaho Conservation League; Brett Dumas, Idaho Power Company; Paul Makela and Tom Rinkes, BLM; Don Kemner, Idaho Department of Fish and Game; Will Whelan and Trish Klahr, The Nature Conservancy; Rich Rayhill, Ridgeline Energy, LLC; Lisa LaBolle and Kirsten Sikes, Idaho Office of Energy Resources; Nate Fisher, Idaho Office of Species Conservation; John Romero, Citizen at Large.



## EXECUTIVE SUMMARY

The state of Idaho is seeing an increasing number of infrastructure projects, such as transmission lines and wind energy facilities, proposed in the state's sagebrush steppe ecosystems. Where federal permits are required, the environmental review process for these projects will analyze how these projects affect sage-grouse and will consider a range of potential mitigation measures to avoid, minimize, or offset any impacts. It is likely that the environmental review process will lead at least some developers and agencies to implement compensatory mitigation.

Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For sage-grouse, this would include, among other things, protecting and restoring sagebrush habitats to offset habitat losses and other effects of infrastructure projects.

This framework describes the general outline for a sage-grouse compensatory mitigation program in Idaho. This program would employ an "in-lieu fee" approach to compensatory mitigation through which a project developer would pay funds into an account managed by the mitigation program for performance of mitigation actions that provide measureable benefits for sage-grouse and their habitats within Idaho.

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, it offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions. It should be emphasized that this program would not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts through appropriate project siting, design and implementation.

Although the initial focus is on sage-grouse, the Mitigation Framework can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associated species. The suitability of the Framework for other species and natural features has not been evaluated.

The objectives of the Mitigation Framework include:

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by actions that benefit the affected species and habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset the impacts of project development and operation on sage-grouse and sage-grouse habitat, and provide a consistent mechanism to offset impacts to the species that can be evaluated in future reviews of the species' status; and
- Evaluate issues based on best available scientific information, while acknowledging and responding to scientific uncertainty.

The Mitigation Framework would be established through a memorandum of agreement (MOA) among entities that have the capacity and commitment to assist in its implementation. Such parties may include land and wildlife management agencies, counties, tribes, participating private infrastructure development companies, and non-governmental organizations. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program.

The Mitigation Framework envisions a program with the following attributes: (1) a Mitigation Team and program administrator to steer the mitigation program and ensure strong oversight; (2) technically sound and transparent guidelines for estimating compensatory mitigation costs; (3) a science-based statewide strategy to guide the selection of mitigation actions that will receive funding; (4) provisions that the costs of operating the program will be borne by infrastructure developers that use the Mitigation Framework to deliver compensatory mitigation; (5) monitoring the implementation and effectiveness of mitigation actions funded by the Mitigation Framework program; (6) a system to track benefits provided by the Mitigation Framework to sage-grouse habitat in Idaho; and (7) periodic evaluation and adaptation of the Mitigation Framework program.

This framework provides only a general outline of a proposed Idaho-based compensatory mitigation program. It is intended to assess the level of support for crafting the agreements and completing the technical tasks needed to bring the Mitigation Framework into being.

## **DISCUSSION**

### **I. The Role of Compensatory Mitigation in Infrastructure Development and Sage-grouse Conservation**

#### **A. Mitigation Basics**

Broadly defined, “mitigation” refers to a wide range of measures that are taken to avoid, minimize, rectify, reduce, or compensate for the adverse impacts of actions affecting the environment. See 40 C.F.R. § 1508.20 (definition of “mitigation” in National Environmental Policy Act (NEPA) rules). In this general sense, mitigation should be an integral part of all phases of project planning and implementation.

The focus of this report is on compensatory mitigation – also known as “biodiversity offsets” or “offsite mitigation.” Compensatory mitigation consists of compensating for residual project impacts that are not avoided or minimized by providing substitute resources or habitats, often at a different location than the project area. For instance, a project developer may fund the restoration of a particular type of habitat in order to replace or “offset” similar habitat that is lost as a result of project construction.

This Framework adopts an “in-lieu fee” approach to compensatory mitigation. Under this approach, a project developer provides funding to a compensatory mitigation program administrator who then distributes the funds to the appropriate government agency, foundation or other organization for performance of mitigation actions. In an in-lieu fee program, the responsibility for actually delivering the compensatory mitigation is transferred from the developer to the program administrator once the developer provides the necessary funds to the in-lieu fee program. It is important to emphasize that compensatory mitigation

does not relieve project developers and permitting agencies of their obligation to avoid and minimize environmental impacts. This Framework endorses the principle known as the “mitigation hierarchy,” which holds that decision makers should consider the elements of environmental mitigation in the following order of priority:

1. Avoid environmental impacts through project siting and design;
2. Minimize the impacts during construction, operation, maintenance, and decommissioning by implementing appropriate conservation measures related to timing and conduct of project activities;
3. Restore areas that have been disturbed or otherwise rectify on-site project-related impacts to the greatest extent practicable; and
4. Compensate for residual impacts (direct and indirect effects that are not mitigated on-site) by providing replacement habitats or other benefits.

This means that compensatory mitigation is addressed only after efforts to avoid, minimize, and mitigate the impacts have been addressed. It also should be noted that significant impacts to habitat areas that support special functions and values for sage-grouse may simply not be replaceable through mitigation and therefore the best course may be to avoid those areas altogether.

## **B. Need for an Idaho Compensatory Mitigation Program**

In recent years, the state of Idaho has seen an increase in the number of major infrastructure projects proposed in the state’s sagebrush steppe ecosystems. Several current proposals involve high voltage transmission lines that would cross over hundreds of miles of sage-grouse habitat. Large scale energy infrastructure projects such as wind farms may also affect large areas of sagegrouse habitat. Where these projects are located at least partially on federally managed public lands they will be required by federal law to go through an extensive environmental review process under NEPA before relevant federal permits are issued. The NEPA process requires the permitting agencies to consider the projects’ environmental effects (both positive and negative), alternatives, and potential mitigation measures. Impacts on sage-grouse will be one of the topics analyzed in the NEPA process.

Even after efforts are taken to avoid and minimize impacts, it is possible that some of these infrastructure projects will degrade some sage-grouse habitat, cause direct sage-grouse mortality, or lead to indirect effects such as avoidance of previously occupied habitat. The extent to which project developers and regulators adopt compensatory mitigation as a means to offset these impacts is not fully known. However, it is likely that at least some developers and regulators will seek to implement compensatory mitigation to benefit sage-grouse and their habitats. Energy companies and other developers face daunting challenges in carrying out compensatory mitigation for sage-grouse habitat. Just identifying specific mitigation actions requires a major effort. Actually implementing sagebrush restoration and enhancement projects is even more difficult and expensive – typically involving years of effort and a significant risk of failure. Delivering this type of technically complex environmental mitigation may be well outside the core business of many infrastructure developers.

## **C. Advantages of the Mitigation Framework**

The Mitigation Framework proposes to respond to these challenges by creating a statewide program to deliver scientifically sound compensatory mitigation for multiple projects. Project developers and regulators would no longer have to design, fund and implement their own mitigation programs. Instead, they would have the option of contributing money to a central fund overseen by agencies with expertise in habitat management and non-governmental partners with similar experience. This approach to compensatory mitigation offers three major advantages. The first advantage stems from the increased efficiency of an Idaho-wide mitigation program compared with fragmented, project-by-project mitigation programs. Mitigation efforts require a significant investment in planning, administration, project oversight, and monitoring. The Mitigation Framework would consolidate these functions, thus avoiding needless duplication. The second advantage is that a state mitigation fund can be used for sage-grouse conservation more strategically and at a greater scale than project-by-project mitigation. As described in more detail below, the Mitigation Framework would fund sage-grouse habitat protection and restoration projects in accordance with a statewide strategy that uses landscape-scale analyses to identify the specific measures and habitats that will provide the greatest benefit for Idaho sagegrouse populations. This Idaho-based mitigation strategy will be integrated with other conservation strategies throughout the range of sage-grouse to ensure that actions taken in Idaho benefit the species as a whole. Third, this method can engage the capacity and competence of natural resources agencies, local governments, private companies, and non-governmental organizations. The Mitigation Framework proposes to enlist these entities in shaping Idaho's strategy, developing criteria for use of the fund, and proposing and implementing habitat protection and restoration projects. The benefits of the Mitigation Framework can be summarized as follows:

*Benefits for Project Developers:*

An efficient and reliable mechanism for meeting compensatory mitigation objectives and permit conditions; and Increased certainty regarding project costs.

*Benefits for Regulatory Agencies:*

Increased certainty that in-lieu fees will result in strategic "on-the-ground" mitigation actions that benefit sage-grouse.

*Benefits for Sage-Grouse:*

Increased certainty that scientifically sound mitigation actions that benefit sage-grouse and offset impacts and habitat losses associated with infrastructure development will be implemented.

#### **D. Ensuring Accountability**

In-lieu fee compensatory mitigation does pose one potentially significant drawback that must be acknowledged and addressed: a poorly designed program may lack accountability for delivering meaningful on-the-ground benefits for sage-grouse. Simply having a project developer contribute to an in-lieu fee mitigation account does not by itself compensate for the sage-grouse impacts caused by the project. Actual mitigation is possible only after well-

conceived habitat protection and restoration projects are planned, funded, implemented, monitored, and successful in achieving stated objectives. The Mitigation Framework seeks to ensure accountability by adopting a series of rigorous and transparent procedures. As described below, the Framework would: (1) ensure that program administration and monitoring functions are adequately funded; (2) provide technically sound guidelines for estimating the costs of delivering compensatory mitigation; (3) establish a sciencebased statewide strategy to guide the program; (4) develop project selection criteria and a request for proposals based on the strategy; (5) require monitoring of the implementation and effectiveness of mitigation actions funded by the program; (6) track benefits the Mitigation

Framework program provides to sage-grouse in Idaho; and (7) require periodic evaluation of the program. Taken together, these procedures provide a high degree of certainty that the Mitigation Framework will be able to turn in-lieu fee payments into tangible, lasting compensatory mitigation for sage-grouse. As described in greater detail in Section E, below, project developers that seek to use the Mitigation Framework will need to show two things. First, they will need to show that their projects' impacts on sage-grouse and their habitats have been evaluated using a scientifically sound process. Second, they will need to show that their contributions to the mitigation fund reflect the Mitigation Framework's compensation guidelines to ensure that funding will be adequate to offset project impacts. Having demonstrated those things, the project developers should then be able to rely on their in-lieu fee contribution to the mitigation account as satisfying their compensatory mitigation objectives or obligations.

## **II. Core Elements of Idaho Sage-Grouse Mitigation Program**

### **A. Program Objectives**

- Provide a credible, efficient, transparent, and flexible mechanism to implement compensatory mitigation;
- Ensure that sage-grouse impacts are offset by mitigation actions that benefit the sage-grouse and their habitats;
- Provide increased certainty for developers and agencies;
- Involve private and public partners in crafting solutions;
- Provide developers the opportunity to offset project impacts on sage-grouse and sage-grouse habitat, and provide a consistent mitigation mechanism that can be evaluated in future reviews of the species' status; and
- Evaluate issues based on best available scientific information while acknowledging and responding to scientific uncertainty.

### **B. Scope**

The Mitigation Framework proposes to mitigate for impacts to Idaho sage-grouse and their habitats in Idaho. The initial focus of the Mitigation Framework is on sage-grouse. However, this program can be readily adapted to provide compensatory mitigation for other sagebrush obligate and associate species, such as pygmy rabbits, if project developers and regulators call for such mitigation.

Whether this Framework is suited for mitigation of impacts to a broader suite of species or natural features has not been evaluated. It should be noted that some subcommittee members expect to advocate in other forums that compensatory mitigation should extend beyond sagegrouse. The Mitigation Framework focuses on infrastructure projects because this type of development is the most likely to give rise to compensatory mitigation under existing environmental policies. As used here, the term “infrastructure” refers to building structures that significantly disturb sage-grouse habitat, including but not limited to projects for electricity transmission, energy generation, pipeline conveyance, transportation, communications, and similar purposes. The Mitigation Framework is not intended to apply to existing projects that are not changing in scope or to the renewal of on-going activities, such as grazing permits. In addition, the Framework is not suited to projects with minor impacts because their contributions to the mitigation program would be too small to justify the effort needed to establish and administer inlieu fee payments.

### **C. Integration with Environmental Review Procedures**

The Mitigation Framework does not alter the legal standards or procedures for review and approval of infrastructure projects. Rather, the Framework offers an option that project developers and/or regulators may choose for implementing mitigation plans and agency permit conditions. The Mitigation Framework is intended to complement the environmental review process conducted pursuant to NEPA and other federal environmental laws as well as county land use planning authorities. Many energy and other infrastructure projects undergo review and approval at the county level. The issues examined and the level of environmental analysis varies widely among individual counties and individual developers. If a county or developer decides to address sage-grouse impacts, it will be able to use the Mitigation Framework as a mechanism for meeting compensatory mitigation objectives that may arise from the county permitting process.

### **D. Mitigation Strategy**

The next step focuses on the Mitigation Team’s task of developing a statewide, science-based strategy that will guide the use of the mitigation fund. The mitigation program strategy would establish priorities for the use of compensatory mitigation funding based on factors/risks identified in the U.S. Fish and Wildlife Service’s 12-Month Findings for Petitions to List Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered (USFWS 2010) and in the Conservation Plan for Greater Sage-grouse in Idaho (2006). The strategy sets mitigation priorities with a landscape view of sage-grouse needs and highlights mitigation opportunities in Idaho based on best available science. In setting priorities, the strategy considers species and community size, landscape condition, and regional context. The strategy is responsive to the threats and risks described in the sage-grouse 12-month findings. The strategy will also generally describe the types of mitigation actions, project specifications, and best practices that are likely to produce measureable benefits for sage-grouse habitat. Finally, the strategy addresses both implementation and effectiveness monitoring requirements for mitigation actions funded through the program. The Mitigation Framework’s strategy will draw heavily from the State of Idaho’s sage-grouse conservation plan but has a narrower focus. It is intended to provide the specific guidance on program priorities, accepted mitigation measures, and geographic areas of emphasis that potential mitigation project sponsors will need to know when they apply for funds. The strategy plays a crucial role in steering mitigation funding to those activities and places that can provide the most effective benefits for Idaho sage-grouse populations consistent

with strategies to increase the viability of the species throughout its range. To this end, the strategy will address one of the major policy questions that arise in the design of compensatory mitigation systems: how closely should the mitigation actions be linked to the type and location of the habitat that was originally affected by the infrastructure project. Stated in the alternative, does removal of the mitigation action from the area of impact improve the effectiveness of or benefit from the action. Some compensatory mitigation systems place a heavy emphasis on this link by favoring “in-kind” and “on-site” compensatory mitigation over “out-of-kind” and “off-site” compensatory mitigation. The subcommittee members generally favor an approach that allows funding to flow to the projects and locations within Idaho that will provide the greatest overall positive impact on sage-grouse populations. The Mitigation Framework calls for a monitoring program that would assess habitat gains provided by mitigation actions and compare them with the mitigation objectives of the participating infrastructure projects. The nature and purpose of this monitoring is described more fully in Mitigation Program Step 4, below.

Once the strategy is complete, the Mitigation Team will develop project ranking criteria and procedures that will guide the selection of the mitigation actions that will receive funding. The goal is to fund projects that provide high quality, lasting benefits based on landscape scale analyses that actually compensate for project impacts.

#### **E. Compensation Guidelines**

The Mitigation Framework Program will develop guidelines that may be used by developers and/or regulators to determine the cost of meeting their compensatory mitigation objectives. These compensatory mitigation objectives determine the extent of compensatory mitigation for each project and are generally incorporated into project plans or permits. The compensation guidelines will provide transparent, technically sound principles for determining how much it costs to deliver habitat mitigation for sage-grouse. In other words, the guidelines will represent best estimates of the true cost of implementing the mitigation actions needed to meet each project’s compensatory mitigation objectives. The guidelines may be used by the project developer and the Mitigation Framework Program Administrator to establish the in-lieu fee that the developer will contribute to the mitigation fund. Specific valuation methods will be developed at a later time and will likely draw from compensatory mitigation systems used elsewhere in the West. Although the details have yet to be worked out, the following outline illustrates the core concepts and principles (shown in bold lettering) that are likely to be employed by the MOA parties in setting the Mitigation Framework’s in-lieu fee structure.

- A common unit of measurement would be established for describing and tracking both the project impacts and the benefits of any compensatory mitigation actions. This unit of measurement can be a physical unit such as “acres impacted” or more specifically “acres of summer brood rearing habitat impacted” or “habitat units” lost.
- While the “common unit of measurement” noted above addresses the area of habitat impacted and mitigated, habitat compensation ratios are used to address the quality of the habitat affected by the infrastructure project. These ratios could specify the number of acres of mitigation required per acre of impacted habitat based on the size, habitat quality/condition and function of the impacted habitat; for more critical or important habitat, more mitigation acres might be required. Thus, habitats with higher quality and importance could have higher compensation ratios.

- Several factors are taken into account in calculating how much it will cost to actually compensate for the acres or habitat units. The recommended approach is to evaluate on the costs of implementing a conceptual portfolio of potential mitigation actions or offset activities that provide benefits for sage-grouse. This portfolio of model projects would include a balanced mix of accepted habitat protection and restoration measures reflecting the types of projects expected to be funded by the mitigation program (in accordance with the strategy discussed above). Examples of projects in this portfolio may include such actions as restoring sagebrush canopy and a native understory on recently burned land, improving riparian areas and wet meadows in early brood-rearing habitat, conservation easements to prevent habitat loss, and land management practices that improve sage-grouse habitat. Project costs include the full range of expenses needed to complete all phases of the mitigation action, including administration and monitoring. The average costs of these model mitigation actions per acre or habitat unit is the foundation of the in-lieu fee calculation.
- In addition, the in-lieu fee should also be adjusted to take into consideration the issue of lag time –the time between when habitat is lost at the impacted site relative to when habitat functions are gained at the compensation site.
- The fee also needs to account for contingencies associated with delivering compensatory mitigation, including an estimate of the risk of failure (i.e., the probability that offsite mitigation will not result in any measureable conservation outcomes) for each mitigation site or project.
- In addition to the fee calculated above, costs for establishing and operating the program, including travel, technical consultation and monitoring of program effectiveness must be included. This overhead fee could range from 5-15% depending on the size and complexity of the proposed mitigation program.

## **F. Program Structure and Oversight**

The Mitigation Framework would be established through a memorandum of agreement (MOA) among the entities that would participate in its implementation. The MOA would define the specific roles and responsibilities, procedures, and tasks needed to operate an Idaho-based compensatory mitigation program. The MOA would serve as a joint powers agreement for state and local government parties. The MOA would establish the following administrative structure for the Mitigation Framework:

1. **Core Team:** A core group would oversee the Mitigation Framework program and provide policy-level guidance for the Science Team and Fund Administrator, described below. The Core Team would be composed of three to seven representatives of diverse perspectives among the MOA signatories.
2. **Science Team:** A team of experts drawn from MOA signatories and other targeted organizations will administer the science-based and technical aspects of the program. The Science Team would consist of several individuals with expertise in relevant areas such as habitat protection and restoration, landscape ecology/spatial analysis, wildlife biology, sage-grouse ecology, project development, and mitigation policy.



The Team would focus on developing the policies and statewide strategy that will guide the program, making requests for mitigation project proposals (RFPs), ranking mitigation proposals that will receive funding, tracking monitoring reports and project benefits, and evaluating program success.

3. Program Administrator: A program administrator will be responsible for fund management and administrative tasks. The program administrator will provide administrative support for the Mitigation Team, manage the mitigation account, and administer grants, contracts, and other agreements.

4. Advisory Committee: A broader advisory committee consisting of agencies, companies and organizations with the skills and commitment that will provide useful advice to the Core Team regarding the implementation of the Mitigation Framework. The specific make up of each of these groups will be determined at a later time. Potential participants in the Mitigation Framework include but are not limited to representatives of:

***State of Idaho:***

Department of Fish and Game  
Management  
Office of Energy Resources  
Office of Species Conservation  
Idaho Department of Lands  
Service

***Energy Companies:***

Idaho Power  
Ridgeline Energy  
Conservancy  
  
Idaho Tribes  
Idaho Sage-Grouse Advisory Committee  
interests)  
Sage-Grouse Local Working Groups

***United States:***

Bureau of Land  
  
U.S. Fish and Wildlife Service  
U.S. Forest Service  
Natural Resources Cons.

***Non-Governmental Organizations:***

Idaho Conservation League  
The Nature  
  
Idaho Counties  
Public Land Users (e.g., grazing

**G. Funding the Mitigation Program**

The costs of administering the program will be sustained by the project developers that seek compensatory mitigation. Therefore, a portion of the in-lieu fee that project developers contribute to the mitigation account will be applied for program administration. As noted above, protecting and restoring sagebrush habitats are time consuming and expensive undertakings. Ensuring that these activities are conducted with strong oversight should be viewed as an exceptionally wise investment.

**III. Mitigation Program Steps**

The Mitigation Framework envisions a five-step process for developing, implementing, and monitoring compensatory mitigation.

### **A. Step 1 – Assessment of Project Impacts and Development of Mitigation Objectives**

Assessment of project impacts should be undertaken by the project developers proposing new infrastructure projects and the government agencies that conduct environmental reviews of those projects. Although the Mitigation Framework process is not responsible for this step, it is nevertheless crucial to the integrity of the mitigation program. Specifically, the Framework's success in achieving its goal of offsetting major infrastructure project impacts on sage-grouse depends on an accurate accounting of those impacts. For many projects, this analysis will be done as part of the environmental review procedures required by NEPA. As noted above, NEPA requires federal agencies to address the full range of direct, indirect and cumulative impacts of the proposed project, alternatives to the proposed action, and potential mitigation before they act on permit applications. Once impacts have been assessed and compensatory mitigation objectives set, the project developer is ready to engage the Mitigation Framework, starting with determining the developer's in-lieu fee contribution.

### **B. Step 2 – Determine the In-lieu Fee Contribution**

The goal of Step 2 is to use valuation techniques, such as the guidelines presented above, to convert the complex range of project impacts, including direct, indirect and cumulative impacts, into monetary terms that become the basis for the in-lieu fee payment. The accepted in-lieu fee compensatory mitigation plan could be a condition of the instrument approving the project (FONSI, ROD, right-of-way grant, conditional use permit, etc.) and thus legally requires the project developer comply with the approved mitigation plan.

### **C. Step 3 – Commitment of Mitigation Funds by Project Developer**

Infrastructure project developers can employ the Mitigation Framework by entering into an agreement with the program administrator with regard to a specific infrastructure project. This project agreement sets forth the parties' respective responsibilities, including the project developer's commitment to pay the in-lieu fee. Importantly, the agreement provides that the project developer's funds can only be used for the purposes set forth in the Mitigation Framework. The agreement may also include "conditions" as requested by regulatory agencies or project developers. For instance, the agreement might provide that the in lieu fee will be used to fund mitigation actions in specific geographic areas in order to meet permit requirements. The program administrator, based on consultation with the MOA parties, may decline to enter into an agreement that is inconsistent with the Mitigation Framework principles or includes conditions that are burdensome or unworkable. Once the agreement specifying the payment structure and schedule is signed, the project developer makes the required in-lieu fee deposits to an interest bearing account managed by the program administrator. After the completion of this step, the project developer is no longer engaged in the Mitigation Framework – unless it has decided to participate as a MOA party.

### **D. Step 4 – Issue Request for Proposals (RFP) and Select, Implement, and Monitor Mitigation Actions**

At least at annual intervals, the Mitigation Team will issue an RFP that invite private companies, non-governmental organizations, and agencies to submit proposals for sage-grouse habitat protection, restoration, and/or enhancement actions. The RFP will provide guidance to mitigation project sponsors on program priorities and criteria. These priorities and criteria will be drawn from the mitigation program strategy including identification of geographic areas where mitigation might provide the greatest benefits as well as identification of the threats that present the highest risk to the species or its core habitat. The Mitigation Team should also reach out to federal, state, and local agencies, non-governmental organizations and the general public in order to facilitate discussion, engage stakeholders, raise awareness of the program and generate responses to the RFP. The RFP will solicit project proposals that contain an operation or implementation plan and address at least the following elements:

- Geographic area;
- Threats addressed and how the mitigation action project will offset impacts resulting from those threats;
- An analysis of current sage-grouse conditions in the area;
- Resource goals and objectives the mitigation action project will seek to provide;
- A description of any coordination with federal, state, tribal and local resource management and regulatory authorities or other stakeholder involvement required to complete the mitigation action (e.g., requirement for NEPA compliance or county permit);
- A description of recent or proposed projects and events in the vicinity of the proposed project, if any, such as fire rehabilitation treatments, restoration or enhancement treatments or other activities that complement the effectiveness or intent of the proposed, mitigation action;
- A description of the long term protection, management, stewardship for the project being implemented, and the entity responsible for these activities; and
- A commitment to periodic evaluation and reporting on the progress of the project in meeting stated goals and objectives, including a process for adaptively redirecting the project if necessary.

When selecting projects, the Mitigation Team will estimate the biological benefits of the projects activities, the likely success of those activities, the duration of benefit expected and measure those benefits in relation to the strategy and RFP objectives. Mitigation Team and the program administrator will work together on continuing program administration and oversight including annual reporting of program activities, expenditures, and benefits. An annual program report will describe program activities, budget, and assessment of whether the mitigation strategy and associated projects are benefitting sage-grouse and at what level or scale. The Mitigation Team and/or Program Administrator should implement a monitoring program to measure and validate whether project-specific objectives have been met. Monitoring is required of all compensatory mitigation actions to determine if the project is meeting its performance standards and objectives. As mentioned above, at regular intervals, the total habitat and/or population gains provided by the programs will be compared with the habitat/population losses associated with the participating infrastructure projects. The purpose of this comparison is to evaluate the mitigation program and make

any necessary program adjustments – particularly if the monitoring shows that the mitigation benefits are not compensating for habitat losses. This comparison will not be a basis for imposing new, unexpected requirements on the infrastructure project developers.

## **CONCLUSION**

The framework of policies, principles and procedures outlined above are meant to start a dialogue among parties engaged in sage-grouse conservation and infrastructure development. If these parties agree with the Mitigation Subcommittee that there is great value in establishing an Idaho-based compensatory mitigation program, then this framework will mark the beginning of an inclusive effort to fill in the details and complete the tasks needed to bring such a program into being. We have confidence in our collective ability to create a compensatory mitigation program that will benefit infrastructure developers, agencies, conservation interests, and – not least – Idaho's sage-grouse.

DRAFT

**Part III –****IDAHO AND SOUTHWESTERN MONTANA SUBREGION-NO NET UNMITIGATED LOSS PROCESS****Introduction**

The No Net Unmitigated Loss strategy is a means of assuring that proposed anthropogenic activities, when approved and implemented will not result in long-term degradation of Greater Sage-Grouse habitat or population and will have a net conservation benefit to the species. The attached ‘flow chart’ identifies a screening process for review of proposed anthropogenic activities. The goal of the process is to provide a consistent approach regardless of the administrative location of the project and to ensure that authorization of these projects will not contribute to the decline of the species. Though the initial Steps (1-6) are done prior to initiating the NEPA process, the authorized officer must ensure that appropriate documentation regarding the rationale and conclusion for each is included in the administrative record.

The flow chart provides for a sequential screening of proposals. However, Steps 2-6 can be done concurrently. Steps 7-12 are related to project implementation.

**Step 1**

This screening process is initiated upon formal submittal of a proposal for authorization for use of federal lands (BLM or Forest Service). The actual documentation would include, at a minimum, a description of the location, scale of the project, and timing of the disturbance and would be consistent with existing protocol and procedures for the specific type of use. It is anticipated that the proposals would be submitted by a third party.

**Step 2**

This initial review would evaluate whether the proposal would be allowed as prescribed in the Greater-Sage-Grouse Land Use Plan Amendment. For example, certain activities are prohibited in suitable habitat, such as wind or solar energy development. If the proposal is an activity that is specific prohibited, the submitter would be informed that the proposal is being rejected since it would not be consistent with the Land Use Plan, regardless of the design of the project.

In addition to consistency with program allocations, the Land Use Plan identifies a limit on the amount of disturbance that is allowed within a ‘biological significant unit’ (BSU). If current disturbance within the affected unit exceeds this threshold, the project should be deferred until such time as the amount of disturbance within the area has been reduced, through restoration or other management actions.

**Step 3**

In reviewing a proposal, determine if the project will have a direct or indirect impact on population or habitat (PPH or PGH). This can be done by:

1. Reviewing Greater Sage-Grouse Habitat maps.
2. Reviewing the 'Base Line Environment Report' (USGS) which identifies the area of direct and indirect effects for various anthropogenic activities.
3. Consultation with agency, Fish and Wildlife Service, or State Agency wildlife biologist.
4. Reviewing the standard and guidelines in the plan amendments (such as buffer distances for the proposed activity).
5. Other methods

If the proposal will not have a direct or indirect impact on either the habitat or population, proceed with the appropriate process for review, decision, and implementation of the project.

#### **Step 4**

If the project could have a direct or indirect impact of sage-grouse habitat or population, evaluate whether the proposal can be relocated so as to not have the indirect or direct impact and still achieve the intent of the proposal. This Step does not consider redesign of the project as a means of not having direct or indirect impacts but rather authorization of the project in a physical location that will not impact Greater Sage-grouse. If the project can be relocated so as to not have an impact on sage-grouse and still achieve objectives of the proposal, inform applicant and proceed with the appropriate process for review, decision, and implementation of the relocated project.

#### **Step 5**

If the preliminary review of the proposal concludes that there may be impacts to sage-grouse habitat and/or population, and the project cannot be effectively relocated to eliminate these impacts; evaluate whether the agency has the authority to modified or deny the project. If the agency does NOT have the discretionary authority to modify or deny the proposal, proceed with the authorization process (NEPA) and include appropriate mitigation requirements that minimize impacts to sage-grouse habitat and populations. Mitigations could include a combination of actions such as timing of disturbance, design modifications of the proposal, site disturbance restoration, and compensatory mitigation actions.

#### **Step 6**

If the agency has the discretionary authority to deny the project and after careful screening of the proposal (Steps 1-4) has determined that direct and indirect cannot be eliminated, evaluate the proposal to determine if the adverse impacts can be mitigated. If the impacts cannot be effectively mitigated within the BSU, reject or defer the proposal. The criteria for determining this situation would include but not limited to:

- Natural disturbance within the BSU is significant and additional activities within the area would adversely impact the species.
- The current trend within the BSU is down and additional impacts, whether mitigated or not, could lead to further decline of the species or habitat.

- The proposed mitigation has proven to be ineffective or is unproven in terms of science based approach.
- The additional impacts, after applying effective mitigation, would exceed the disturbance threshold for the BSU.
- The project would impact habitat that has been determined, through monitoring, to be a limiting factor for species sustainability within the BSU.
- Other site specific criteria that determined the project would lead to a downward trend to the current species population or habitat with the BSU.

If the project can be mitigated to provide for a net conservation benefit to the species, proceed with the design of the mitigation plan and authorization (NEPA) of the Project. The authorization process could identify issues that may require additional mitigation or denial/deferring of the project based on site specific impacts to the Greater Sage-grouse.

## Appendix K – Lands No Longer Available for Disposal

The following public land parcels have been previously identified through the land use planning process as available for sale in conformance with the criteria described in the Federal Lands Policy and Management Act. These lands may be considered for exchange as described in the Proposed Plan but are no longer available for sale.

### Upper Snake Field Office

Legal Description	Acres
T 12 NR 38 E 028 NENW	40
T 11 NR 39 E 019 SENE	40
T 11 NR 39 E 019 NESE	40
T 11 NR 39 E 019 SESE	40
T 12 NR 37 E 027 NWSW	40
T 11 NR 37 E 020 NWNE	40
T 10 NR 37 E 028 SWSW	40
T 10 NR 37 E 034 NWSW	40
T 10 NR 37 E 034 NESW	40
T 10 NR 37 E 033 SENE	40
T 10 NR 37 E 034 SENE	40
T 10 NR 37 E 034 SWSW	40
T 10 NR 37 E 034 SESW	40
T 11 NR 36 E 017 SWSE	40
T 11 NR 36 E 017 SESE	40
T 11 NR 34 E 014 NENE	40
T 11 NR 35 E 014 NENE	40
T 11 NR 34 E 015 SWNE	40
T 11 NR 35 E 013 SWNW	40
T 11 NR 35 E 013 SENW	40
T 11 NR 34 E 014 SWSW	40
T 11 NR 35 E 017 SESW	40
T 11 NR 34 E 022 NWNW	40
T 11 NR 35 E 020 NENE	40
T 11 NR 36 E 020 NWNE	40
T 11 NR 36 E 020 NENE	40
T 11 NR 35 E 021 SESW	40
T 11 NR 36 E 019 SWSW	25.31
T 11 NR 36 E 030 NWNW	25.52
T 11 NR 36 E 030 SENE	40
T 11 NR 36 E 030 NWSE	40



**Upper Snake Field Office**

T 11 NR 36 E 030 NESE	40
T 11 NR 34 E 026 SESE	40
T 11 NR 36 E 030 SESE	40
T 11 NR 34 E 035 NENE	40
T 11 NR 35 E 034 NWNW	40
T 11 NR 35 E 034 NWSW	40
T 11 NR 34 E 035 SENE	40
T 11 NR 35 E 034 SWNW	40
T 11 NR 34 E 035 SWSW	40
T 11 NR 34 E 035 SESW	40
T 10 NR 36 E 005 SWNW	40
T 10 NR 35 E 003 NENW	38.86
T 10 NR 36 E 030 NWNE	40
T 10 NR 36 E 030 NENE	40
T 10 NR 36 E 006 SENE	40
T 10 NR 36 E 006 SWSW	35.22
T 10 NR 35 E 001 NESW	40
T 10 NR 35 E 029 SWSW	40
T 10 NR 36 E 029 SWSW	40
T 10 NR 36 E 030 SWNE	40
T 10 NR 35 E 031 NENE	40
T 10 NR 35 E 031 SENE	40
T 10 NR 35 E 034 SWSW	40
T 10 NR 35 E 031 NWSE	40
T 10 NR 35 E 031 NESE	40
T 10 NR 35 E 034 NWSW	40
T 10 NR 36 E 032 NESW	40
T 10 NR 36 E 035 NESW	40
T 10 NR 36 E 035 NESE	40
T 09 NR 35 E 005 SENW	40
T 09 NR 35 E 005 NENW	39.04
T 09 NR 36 E 005 NWNE	40.7
T 12 NR 33 E 017 SESW	40
T 12 NR 33 E 019 NENE	40
T 10 NR 32 E 012 SWSW	40
T 10 NR 32 E 013 NENW	40
T 01 NR 29 E 009 SENW	40
T 02 SR 29 E 019 SWNE	40
T 03 SR 29 E 004 NESW	40

**Upper Snake Field Office**

T 02 NR 40 E 012 SENE	40
T 02 NR 41 E 035 SENW	40
T 03 NR 41 E 034 SWSE	40
T 13 NR 39 E 035 SENW	40
T 13 NR 39 E 035 SWNE	40
T 12 NR 39 E 009 SENW	40
T 12 NR 39 E 009 SWSE	40
T 12 NR 38 E 019 SENE	40
T 05 NR 35 E 002 SENW	38.64
T 05 NR 35 E 002 SWNE	38.52
T 07 NR 36 E 034 NESW	40
T 05 NR 35 E 002 NESW	40
T 05 NR 35 E 002 NWSE	40
T 05 NR 35 E 002 SWSW	40
T 05 NR 35 E 002 SESW	40
T 05 NR 35 E 002 SWSE	40
T 05 NR 35 E 010 NWNE	40
T 05 NR 35 E 010 NENE	40
T 05 NR 35 E 011 NWNW	40
T 05 NR 35 E 011 NENW	40
T 05 NR 35 E 011 NWNE	40
T 05 NR 35 E 010 SENE	40
T 04 NR 36 E 009 NENE	40
T 04 NR 36 E 015 SWNW	40
T 04 NR 36 E 015 SENW	40
T 04 NR 36 E 009 NESE	40
T 04 NR 36 E 010 NWSW	40
T 04 NR 36 E 010 NESW	40
T 04 NR 36 E 010 NWSE	40
T 04 NR 36 E 010 NESE	40
T 04 NR 36 E 010 NWNW	40
T 04 NR 36 E 010 NENW	40
T 04 NR 36 E 010 NWNE	40
T 04 NR 36 E 010 NENE	40
T 04 NR 36 E 011 NWNW	40
T 04 NR 36 E 009 SENE	40
T 04 NR 36 E 010 SWNW	40
T 04 NR 36 E 010 SENW	40
T 04 NR 36 E 010 SWNE	40

**Upper Snake Field Office**

T 04 NR 36 E 010 SENE	40
T 04 NR 36 E 011 SWNW	40
T 04 NR 36 E 009 SESE	40
T 04 NR 36 E 010 SWSW	40
T 04 NR 36 E 010 SESW	40
T 04 NR 36 E 010 SWSE	40
T 04 NR 36 E 010 SESE	40
T 04 NR 36 E 015 NWNW	40
T 04 NR 36 E 015 NENW	40
T 04 NR 35 E 032 SWSW	40
T 04 NR 35 E 032 SESW	40
T 13 NR 36 E 004 SWSE	40
T 01 NR 31 E 006 SWNE	23.69
T 01 NR 31 E 006 SENE	23.15
T 01 NR 31 E 005 SWNW	22.9
T 01 NR 31 E 005 SENW	22.93
T 01 NR 31 E 005 SWNE	22.97
T 01 NR 31 E 005 SENE	23
T 01 NR 31 E 004 SWNW	22.94
T 01 NR 31 E 004 SENW	22.78
T 01 NR 31 E 004 SWNE	22.62
T 01 NR 31 E 004 SENE	22.46
T 01 NR 31 E 003 SWNW	22.47
T 01 NR 31 E 003 SENE	23.03
T 01 NR 31 E 002 SWNW	23.15
T 01 NR 31 E 002 SENW	23.21
T 01 NR 31 E 005 NWSE	40
T 01 NR 31 E 004 NWSW	40
T 01 NR 31 E 005 SWSE	40
T 01 NR 31 E 004 SWSW	40

**Challis Field Office**

<b>Legal Description</b>	<b>Acres</b>
7N 24E E2SE NE	40
7N 24E E2SE NE	41
7N 24E E2SE NE	41
7N 24E E2SE	41
7N 24E E2SE	41
7N 24E S21NENW	40
7N 24E NE	40
7N 24E NE	40
7N 24E NE	40
7N 24E NE	40
7N 24E S 17 NWNW	40
8N 21E S2 SENE	40
8N 21E S15 NENE	39
8N 23E S 25 NENE	10
8N 23E S 25 NENE	30
8N 23E S 25 SWSE	40
8N 23E S 25 SESW	40
8N 24E S31 Lot 3	19
8N 24E S31 Lot 4	19
8N 24E S31 Lot 10	19
7N 22E S3 NESE	41
7N 22E S11 NENW	40
7N 22E S11 NWNW	40
8N 21E S9 NWNE	40
7N 23E S5 NESE	39
8N 21E S9 E2NWSW	20
8N 21E S9 E2SWNW	20
8N 23E S30 Lot 6	2
7N 24E S 7 E2NW	52
7N 24E S 7 E2NW	51
7N 24E S 7 NESW	47
7N 24E S 7 Lot 2	48
7N 24E S 9 S2SW	40
7N 24E S 9 S2SW	40
7N 24E S 17 NE	40
8N 24E S31 Lot 9	19
7N 22E S3 Lot 2	41
8N 23E S26 NESE	40
8N 24E S31 Lot 7	40
8N 22E S17 NENE	40
8N 22E S13 Lot 4	40
8N 22E S13 Lot 2	40

**Challis Field Office**

8N 22E S12 Lot 6	40
7N 24E S24 SESE	40
7N 24E S25 NENE	41
7N 25E S30 Lot 1	51
7N 25E S30 Lot 2	46
9N 22E S32 SWSW	40
10N 18E S13 NWSESW	10
12N 20E S23 E2E2E2SW	8
12N 20E S23 E2E2E2SW	8
12N 20E S26 E2E2E2NW	8
12N 20E S26 E2E2E2NW	8
12N 20E S26 NESW	40
7N 25E S30 E2SW	23
7N 25E S30 SE	7
7N 25E S30 SE	41
7N 25E S30 SE	41
7N 24E S25 S2S2N2	15
7N 24E S25 S2S2N2	11
7N 24E S25 S2S2N2	8
7N 24E S25 S2S2N2	3
7N 25E S30 SE	1
8N 21E S2 SWSW	41
8N 21E S2 SESW	40
8N 22E S3 NWSW	41
8N 22E S13 N2SE	40
8N 23E S18 lot 7	7
8N 23E S18 lot 7	32
8N 23E S18 lot 7	0
8N 23E S19 SWSE	41
8N 23E S19 Lot 9	31
8N 23E S19 Lot 5	17
8N 23E S19 Lot 10	5
8N 23E S19 Lot 13	18
8N 23E S 29 Lot 2	4
7N 20E S9 SW4	40
7N 20E S17 NE4	40
8N 22E S2 Lot 8	39
8N 21 E S1 SWSW	40
7N 23E S9 SW4	40
7N 23E S9 SW4	40
7N 23E S9 SW4	40
7N 20E S17 NE4	40
7N 20E S17 NE4	40

**Challis Field Office**

7N 20E S17 NE4	40
8N 21E S11 NENW	41
8N 21E S11NESW	40
8N 21E S11 N2SE	40
8N 21E S11 N2SE	40
8N 21E 20S NWSW	40
8N 23E S 29 Lot 2	2
8N 23E S30 NWNE	11
8N 23E S30 NWNE	29
8N 22E S13 N2SE	40
8N 22E S13 SESE	40
8N 22E S12 Lot 2	41
8N 22E S11 Lot 2	40
10N 18E S12 NESENW	9
10N 18E S13 SESENWNW	3
11N 18E S12 NWNWNWNW	1
11N 18E S35 NESESW	10
12N 20E Lot 2	32
12N 20E S4 Lot 8	36
12N 20E S4 Lot 5	15
12N 20E S4 Lot 2	8
12N 20 S10 Lot 2	21
12N 20 S10 Lot 3	2
13N 20E S20 Lot 2	7
13N 20E S29 Lot 2	2
13N 20E S29 Lot 3	8
13N 20E S33 Lot 2	10
13N 23E S19 NENE	40
13N 23E S34 NENE	40
14N 22E S6 SWNE	40
14N 22E S6 E2NE	41
14N 22E S6 E2NE	40
15N 21E S13 S2SW	40
15N 21E S13 S2SW	40
15N 21E S14 S2 (Below Road)	40
15N 21E S14 S2 (Below Road)	40
15N 21E S14 S2 (Below Road)	40
15N 21E S14 S2 (Below Road)	40
15N 21E S15 (South of County Road)	7
15N 21E S15 (South of County Road)	40
15N 21E S15 (South of County Road)	26
15N 21E S15 (South of County Road)	5
15N 21E S15 (South of County Road)	40

**Challis Field Office**

15N 21E S15 (South of County Road)	40
15N 21E S15 (South of County Road)	39
15N 21E S15 (South of County Road)	22
15N 21E S15 (South of County Road)	40
15N 21E S15 (South of County Road)	40
15N 21E S15 (South of County Road)	41
15N 21E S15 (South of County Road)	41
15N 21E S22 W2NE	40
15N 21E S22 W2NE	40
15N 21E S22 SENW	40
15N 21E S23 N2NE	40
15N 21E S23 N2NE	40
15N 21E S24 N2NW	40
15N 21E S24 N2NW	40
15N 22E S31 W2W2W2E2SE	9
16N 20E S26 S2NENW	19
16N 20E S27 E2E2SE	37
10N 18E S12 SENENW	9
10N 18E S32 SWSWNWSE	2
10N 18E S32 SESENESW	2
13N 20E S18 SWSE	40
14N 23E S34 NESW	40
15N 22E parts S19	40
15N 22E parts S19	40
15N 22E parts S19	40
15N 22E parts S20	40
15N 22E parts S20	40
15N 22E parts S29	40
15N 22E S32 Lot 2	40
13N 19E S21 Lot 10	12
8N 22E S2 Lot 9	10
8N 22E S2 Lot 5	2
7N 25E S30 SE	31
15N 21E S22 SENW	40
16N 20E S23 S2S2SE	24
16N 20E S23 S2S2SE	8
11N 18E S22 pending survey	28
11N 18E S22 pending survey	39
11N 18E S22 pending survey	37
11N 18E S22 pending survey	23
11N 18E S22 pending survey	40
11N 18E S22 pending survey	40
11N 18E S22 pending survey	30

**Challis Field Office**

11N 18E S22 pending survey	40
11N 18E S22 pending survey	40
11N 18E S22 pending survey	29
8N 22E S11 lot 3	36
8N 22E S12 lot 3	4
8N 22E S13 lot 5	25
8N 23 E S32 Lot 2	37
8N 23E S 33 Lot 2	10
8N 23E S 33 Lot 3	35
8N 23E S 33 Lot 8	27
8N 23E S 33 Lot 6	11
12N 18E S3 Lot 18	4
13N 19E S10 SESENESE	1
14N 18E S2 Lot 4	36
15N 21E S7 NENWNW	9
16N 20E S24 (East of Hwy 93)	37
11N 17E S24 S2 East of patented 3144A	40
11N 17E S24 S2 East of patented 3144A	16
11N 17E S24 S2 East of patented 3144A	22
11N 17E S24 S2 East of patented 3144A	16
11N 17E S24 S2 East of patented 3144A	40
11N 17E S24 S2 East of patented 3144A	34
11N 17E S24 S2 East of patented 3144A	1
11N 17E S24 S2 East of patented 3144A	<1
11N 17E S24 S2 East of patented 3144A	<1
11N 17E S25 N2NE North of Salmon River	19
11N 17E S25 N2NE North of Salmon River	12
11N 17E S25 N2NE North of Salmon River	9
11N 17E S25 N2NE North of Salmon River	2
11N 17E S25 N2NE North of Salmon River	<1
11N 18E S2 NENESENE	1
11N 18E S30 SWNWSWNE	3
13N 19E S4 SESW	40
13N 19E S4 E2NWSW	20
13N 19E S4 W2NESW	20
13N 19E S5 Lot 9	37
14N 18E S35 SESESESW	1
13N 19E S4 Lot 9	1
13N 19E S4 Lot 15	1
13N 19E S4 Lot 18	10
13N 19E S4 Lot 19	<1
13N 19E S4 Lot 19	16
13N 19E S4 SESW	1



**Challis Field Office**

13N 19E S4 Lot 14	6
11N 18E S22 pending survey	6
11N 18E S22 pending survey	37
11N 18E S22 pending survey	39
11N 18E S22 pending survey	40
11N 18E S22 pending survey	6
11N 18E S22 pending survey	2
11N 18E S22 pending survey	2
11N 18E S22 pending survey	3
11N 18E S22 pending survey	6
11N 18E S22 pending survey	11
11N 18E S22 pending survey	40
11N 18E S22 pending survey	40
11N 18E S22 pending survey	26
11N 18E S22 pending survey	3
16N 20E S35 lot 9	4
16N 20E S35 lot 10	3
11N 18E S22 pending survey	<1
11N 18E S22 pending survey	<1
11N 18E S22 pending survey	<1
13N 19E S9 Lot 1	3

**Dillon Field Office**

T. 3S; R.1W;	Section 3:	Lot 1	43.02
		Lot 2	43.04
	Section 7:	Lot 6	18.68
		Lot 7	2.10
		SE1/4 SE1/4 SW1/4 NW1/4	2.50
		NE1/4 SE1/4 SE1/4 NW1/4	2.50
	Section 18:	Segregated Survey within Lot 8	1.21
	Section 31:		9.10
	Section 32:	Lot 4	1.16
		Lot 5	1.21
		Lot 8	0.59
		Lot 10	0.02
		Lot 11	20.79
T. 4S; R.1W;	Section 2:	SW1/4 NE1/4 and NW1/4 SE1/4	80.00
T. 8S; R. 1W;	Section 33:		121.38
T. 9S; R.1W;	Section 4:	Lot 1	47.34
T. 3S; R. 2W;	Sections 2, 12 and 13:	All segregated surveys	180.26
	Section 13:	Lot 1	10.39
T.4S; R.2W;	Section 10:		20.90
	Section 35:	SE1/4 NW1/4	40.00
T. 5S; R. 2W;	Section 18:	S1/2 SE1/4	80.00
T.13S; R. 2W;	Section 17:	NE1/4 NE1/4	40.00
T. 2S; R. 3W;	Section 23:	Lot 7	24.79
T. 6S; R. 3W;	Section 1:	S1/2 SW1/4	80.00
	Section 2:	Lot 2	41.30
	Section 7:	Lot 5	9.24
	Section 8:	Lot 1	21.87
		Lot 2 unpatented portion	13.55
		NW1/4 NE1/4 SW1/4	10.00
	Section 13:	SW1/4 SW1/4	40.00
	Section 14:	S1/2 NE1/4	80.00
	Section 17:	SW1/4 NW1/4 NE1/4	10.00
	Sections 29 and 32:		21.60
T. 4S; R. 4W;	Section 19:	W1/2 NW1/4 SE1/4	15.46

Section 31:	SE1/4	160.00	
T. 6S; R. 4W;	Section 13:	S1/2 S1/2 NW1/4 NE1/4	10.00
	Section 14:	N1/2 SW1/4 NW1/4 NE1/4	5.00
		S1/2 S1/2 N1/2 NE1/4	20.00
		SE1/4 NE1/4	40.00
		SE1/4 SE1/4	40.00
	Section 24:	W1/2 NW1/4	80.00
T. 4S; R.5W;	Section 13:	NW1/4 SE1/4	40.00
T. 7S; R.6W;	Section 21:	Lot 21	0.06
		Lot 22	7.15
		Lot 23	1.69
		Lot 24	0.29
Section 28:		Lot 7	3.61
T.9S; R.6W;	Section 27:	SW1/4 SW1/4	40.00
T. 12S; R.6W;	Section 4:	NW1/4 SE1/4	40.00
T. 13S; R.6W;	Section 7:	NE1/4 SW1/4	40.00
T. 6S; R.7W;	Section 34:	NW1/4 NE1/4	40.00
T. 7S; R 7W;	Section 2:	NE1/4 SE1/4	40.00
	Section 26:	SE1/4 SW1/4	40.00
	Section 27:	NW1/4 SE1/4	40.00
	Section 35:	NW1/4 NW1/4	40.00
T. 3S; R.8W;	Section 19:	NE1/4 SW1/4 and NW1/4 SE1/4	80.00
	Section 30:	NE1/4 SW1/4	40.00
T. 4S; R.8W;	Section 2:	Lot 1	46.42
T. 12S; R. 8W;	Section 26:	NW1/4 NE1/4	40.00
	Section 35:	SE1/4 NE1/4	40.00
T. 14S; R. 8W;	Section 9:	NW1/4 SE1/4	40.00
T. 9S; R. 9W;	Section 21:	NW1/4 NE1/4	40.00
T. 14S; R. 9W;	Section 25:	SE1/4 NW1/4	40.00
T. 6S; R. 10W;	Section 29:	Lot 11	0.06
		Lot 12	0.02
	Section 30:	Lot 7	1.05
		Lot 11	0.11
		Lot 12	0.23
T. 9S; R.10W;	Section 20:	NE1/4 NW1/4	40.00

Section 27:	W1/2 SW1/4	80.00
T. 10S; R.10W; Section 23:	SW1/4 NE1/4	40.00
T. 14S; R.10W; Section 10:	E1/2 SW1/4 SE1/4	20.00
T. 7S; R.11W; Section 33:	Lot 2	0.13
T. 6S; R. 12W; Section 8:		1.8
T.10S; R.12W; Section 19:	Lot 1	38.37
Section 31:	Lot 2	38.15
	Lot 3	38.42
T. 5S; R.14W; Section 20:	SE1/4 NE1/4	40.00
Section 32:	SE1/4 SW1/4	40.00
T. 9S; R.14W; Section 1:	Lot 1	39.87
T. 3S; R.16W Section 3:	NE1/4 NE1/4	40.00
T. 3S; R.1E; Section 5:	Segregated survey bound by Lots 5&6	11.60
T. 14S; R.1E; Section 23:	NW1/4 NE1/4	40.00

**Appendix L – Travel Management Planning Guidelines:**

- Among other designation criteria from 43 CFR 8342.1(b), “areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
- During subsequent travel management planning, all routes would undergo a route evaluation to determine its purpose and need and the potential resource and/or user conflicts from motorized travel. Where resource and/or user conflicts outweigh the purpose and need for the route, the route would be considered for closure or considered for relocation outside of sensitive GRSG habitat.
- During implementation-level travel planning, threats to GRSG and their habitat would be considered when evaluating route designations and/or closures.
- During subsequent travel management planning, routes that do not have a purpose or need would be considered for closure.
- During subsequent travel management planning, routes that are duplicative, parallel, or redundant would be considered for closure.
- During subsequent travel management planning, seasonal restrictions on OHV use would be considered in important seasonal habitats where OHV use is a threat.
- During subsequent travel management planning, OHV timing limitations would be considered in important seasonal habitats where OHV use is a threat.
- During subsequent travel management planning, consider limiting over snow vehicle (OSV) travel to designated routes, consider seasonal closures in GRSG wintering areas from November 1 through March 31 or define Designation Criteria (i.e. minimization criteria) to regulate over snow vehicle traffic.
- During subsequent travel management planning, routes not required for public access or recreation with a current administrative/agency purpose or need would be evaluated for administrative access only.
- During subsequent travel management planning, consider prioritizing restoration of routes not designated in a Travel Management Plan.
- During subsequent travel management planning, consider using seed mixes or transplant techniques that will maintain or enhance GRSG habitat when rehabilitating linear disturbances.
- During subsequent travel management planning, consider scheduling road maintenance to avoid disturbance during sensitive periods and times to the extent practicable. Consider using time of day limits (After 10:00 AM to 7:00 PM) to reduce impacts on GRSG during breeding and nesting periods.

Over-snow vehicle – a motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow.

DRAFT

**Appendix M – Functioning of Boards**

DRAFT

Many Montana landowners are long familiar with the rhythmic strutting of the greater sage-grouse attracting mates on dancing grounds across rangelands each spring. Sage-grouse are also gaining recognition as a species that responds to activities at local and landscape-scales. This means habitat management for the conservation of sage-grouse requires coordination and investment among interest groups and private landowners across large expanses of public and private lands. Landowners play a pivotal role in implementing broad-scale strategies at local levels to conserve this iconic species.

The U.S. Fish and Wildlife Service (USFWS) has designated the greater sage-grouse as a candidate species for listing under the Endangered Species Act. They will make a final listing determination by fall 2015. Voluntary implementation of conservation practices by private landowners, through the NRCS Sage-grouse Initiative or other programs, can help preclude the need to list under the Endangered Species Act.



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12/4/2015

Montana Fish, Wildlife & Parks  
1420 East Sixth Avenue  
Helena, MT 59620



# Landowner Assistance Programs

for Conservation of Greater Sage-grouse in Montana





The following information highlights various programs available to landowners that can be leveraged for conserving sage-grouse populations while also promoting sustainable ranching operations. As our friends in Montana's Conservation Districts say, "What's good for cows is good for sage-grouse." There is a win-win out there that we hope this brochure will highlight. All the programs listed here are voluntary. Contact your local Natural Resource Conservation Service (NRCS) Field Office, Montana Fish, Wildlife and Parks (FWP) Regional Office, or Bureau of Land Management (BLM) Field Office for more information on any of these programs.

**Think Collaboratively!** There are numerous opportunities in Montana to coordinate among agencies to help improve sagebrush-grasslands for livestock, sage-grouse, and other wildlife species!

## Range Management

There are several working lands programs available that provide technical and financial assistance to landowners employing range practices beneficial to sage-grouse. Technical assistance is available for any of the topics listed below and many other practices not listed here.

### ► Fence modifications

Marking fences in high risk areas, which is only about 6-14% of the fences in sage-grouse habitat, can reduce sage-grouse collisions with fences by 83%. Fence collision risk increases closer to leks and in relatively open, flat landscapes. NRCS has developed a collision risk tool to map high risk areas. **NRCS, BLM, FWP, Montana Association of Conservation Districts and Intermountain West Joint Venture** provide free markers to landowners to mark fences in high risk areas. These agencies can assist with finding volunteers for deployment of markers.



FWP's **Private Land Technical Assistance Program** and NRCS's **EQIP** can provide recommendations and financial assistance for constructing or modifying existing fences to meet wildlife friendly guidelines. FWP's *A Landowner's Guide to Wildlife Friendly Fences* publication provides technical guidance.

### ► Grazing practices

Sustainable grazing practices may improve soil health and enhance vegetative communities, benefitting livestock operations and sage-grouse. Technical and financial assistance for prescribed grazing systems and associated infrastructure including fences, water tanks, and wildlife escape ramps are provided by NRCS's **Sage-grouse Initiative** and FWP's **Habitat Montana, Private Land Technical Assistance Program** and the **Upland Game Bird Enhancement Program**. Several of Montana's Conservation Districts sell escape ramps for a minimal charge. FWP programs allow for consultation and grazing system design in addition to cost-sharing on boundary and interior fences and can be applied to grazing leases on state or federal lands.



NRCS and BLM are working cooperatively on whole ranch plans if a landowner desires that cross jurisdictional boundaries be used to facilitate landscape-scale planning. Typically one plan among agencies will simplify grazing management for the lessee.

### ► Restoration and enhancement

NRCS's **Sage-grouse Initiative** and FWP's **Upland Game Bird Enhancement Program** can provide financial assistance for a variety of restoration, seeding, and invasive species control activities designed to enhance sagebrush systems for sage-grouse. **County Weed Districts** often have free equipment loan programs and may provide funding as-

sistance for noxious weed control if the property is located in a Cooperative Weed Management Area.

Wetland restoration and enhancement can be beneficial to sage-grouse as brood rearing habitat in localized areas. There are a variety of assistance programs available for wetlands including **NRCS Programs, FWP Migratory Game Bird License Habitat Program, Montana Department of Transportation, North American Wetland Conservation Act** funding, and others.

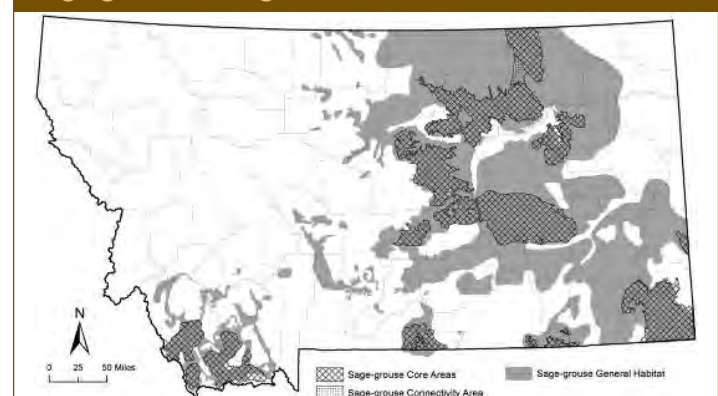
## Conservation Easements

Landowners interested in protecting sage-grouse habitat have a variety of easement options. Often, partnerships can be established to leverage a combination of programs to maximize return to landowners. Local land trusts and conservation organizations can also help identify potential easement funding sources.

NRCS offers the **Agricultural Conservation Easement Program (ACEP)** that provides a permanent easement option on rangelands or wetlands. ACEP requires a 1:1 match of federal to non-federal dollars for agricultural easements but there may be a waiver for portions of the match requirement on some grasslands. Partnerships can often help secure some non-federal match. Wetland easements do not require match. Reserved grazing rights are available with wetland easements but payments are decreased proportionately for the retention of that right.

FWP offers permanent conservation easements through various programs including **Habitat Montana, Upland Game Bird Enhancement Program (UGBEP), and Migratory Bird Habitat Program**. FWP easements typically require grazing management plans. Productive upland game bird habitats that also provide substantial bird hunting opportunities are the focus of conservation easements funded in part with UGBEP dollars. Migratory Bird Habitat Program funds are only eligible for wetlands and associated uplands.

### Sage-grouse Management



FWP has designated priority areas for sage-grouse conservation called Core Areas. General habitat are areas that support sage-grouse but typically in lower densities than Core Areas. Range management practices and easements that benefit sage-grouse are encouraged throughout their range but especially in Core Areas.

# Owyhee County

## Sage-Grouse Local Working Group



### Funding

The OCSGLWG has obtained over **\$X,000,000** in project funding for sage-grouse habitat and research projects since 1998.

The OCSGLWG finds available funding sources and works to match these to willing landowners who can make the largest conservation gains.

Sage-grouse Initiative, EQIP and WHIP funding is available through the Natural Resources Conservation Service.

US Fish and Wildlife Service offers several funding opportunities including: Private Stewardship Program, Cooperative Conservation Initiative, Multistate Conservation Grant Program, and Landowner Incentive Grant.

Several private organizations have funding available including the Nature Conservancy and the Rocky Mountain Elk Foundation.

The Jordan Valley Cooperative Weed Management Area and the Eastern Owyhee Cooperative Weed Management Area have the ability to assist with many invasive species issues.



*A complete copy of the LWG management plan is available through the Owyhee County Natural Resources Committee or the Idaho Department of Fish and Game*

*Anyone interested in helping with this project can contact:*

**Donna Bennett**  
LWG Chair.  
(208) 834-2398  
**Jim Desmond**  
Director

Owyhee Co. Natural Resources Committee  
(208) 495-2185

**Michelle Commons-Kemner**  
Idaho Department of Fish and Game  
(208) 465-8465

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**12/4/2015**

Since 1998 the OCSGLWG has utilized local input and knowledge to protect and enhance sage-grouse management and sage-grouse habitat on private and public lands in Owyhee County.

**Locally Led**  
**Locally Focused**



Habitat conversion from wildfire and invasive species are the biggest threats to the continuing existence of sage-grouse.

## SAGE-GROUSE MANAGEMENT PLAN

Initially the Local Working Group (LWG) spent two years gathering input from a wide variety of participants, identifying issues and planning strategies to deal with those issues.

A management plan was written in 2000. It has been endorsed by the Owyhee Cattleman's Association, the Owyhee County Natural Resources Committee, various wildlife services, the Bureau of Land Management, the Idaho Department of Fish and Game, and the Idaho Department of Lands. The plan was updated in 2004 and 2012. It is available on the Idaho Department of Fish and Game website.



The Idaho Department of Fish and Game has been an integral part of the Owyhee County Sage-Grouse Local Working Group since its inception. The IDFG has contributed manpower, technical assistance, and funding.

The Owyhee County Sage Grouse Local Working Group was formed in April 1998 in conjunction with both the Idaho State Plan, which called for Local Working Groups, and the County Land Use Plan, which called for the formation of subcommittees of the County Land Use Planning Committee whenever a species was believed to be threatened or endangered.



Pete DePrati 1955

In August of 1998, the County Land Use Planning Committee, forerunner of the current County Natural Resources Committee, signed a Memorandum of Understanding with the Idaho Department of Fish and Game.

This memorandum established the roles and responsibilities of the two organizations in the development of a local working group and the production of a local conservation plan.

## Project Successes

### Bluebird Mine Fire Restoration

Burned in 2003. This site was effectively treated with seed mix designed to be beneficial to sage-grouse.

### Crab Creek Meadows

#### Restoration

Stream head cutting lowered the water table in this meadow, destroying this important brood rearing area. The installation of dikes immediately restored the meadow!



### Chubby Spain Fire Restoration

6,011 acres burned in 2006. Aerial and broadcast seeding of sagebrush and other natives occurred with high success.

### Juniper Mastication

We proved that mechanical removal of juniper trees can be cost effective and can immediately benefit sage-grouse habitat by restoring sagebrush and meadows.

## Idaho/Southwest Montana Subregion Sage-Grouse RMP/EIS

### Cooperating Agency Call

April 10, 2014 10:00 a.m. MST

#### Attendance

BLM/FS: Brent Ralston

Counties: Doug Balfour – Power County; Jack Depperschmidt – DOE

#### Meeting Minutes

- The ID team is reviewing the public comments and ensuring the comments are responded to. Determining what changes need to be made in the FEIS. Had a week-long meeting last week and groups met by program area to respond to comments.
- Team of biologists and planners will be meeting over the next month and a half to review the greater sage-grouse science, including the science in the draft and additional literature suggested by the public. Group will determine how best to incorporate those into the existing analysis.
- Putting together preliminary proposed plan internally through the end of this month. Hope to share this with cooperators by early to mid-May. Review timeframe will likely be 1-2 weeks.
- BLM and Forest Service are having discussions with the state and USFWS regarding the mapping of greater sage-grouse management areas.
- BLM/FS also having additional discussions with the state task force about the alternatives. Team is choosing management largely from Alternatives D and E and the proposed plan will incorporate adaptive management. Ongoing discussions regarding the disturbance cap. Trying to ensure we're looking and measuring at the same scale for the disturbance cap and adaptive management/monitoring components.
- Trying to streamline the FEIS so that it is easier to review. Proposed plan will not likely be presented in a matrix but will be organized in a shorter, bulleted format. Matrix was useful for comparison of alternatives in the draft, but the focus is on the proposed plan for the FEIS.
- Poisoning ravens project – incorporated into the cumulative effects analysis. BLM does not have a decision to make on this, but the project could affect sage-grouse and ravens. Will look at the APHIS NEPA document and incorporate their effects analysis into our cumulative effects for a more complete picture of effects.

Wyane Butts, Representative  
Custer County Commissioners  
P.O. Box 385  
Challis, ID 83226

Dear Mr. Butts,

As the Idaho Bureau of Land Management (BLM) State Director, I have signed the Memorandum of Understanding (MOU), formalizing your cooperating agency agreement with Idaho BLM as part of the BLM's National Greater Sage-Grouse Planning Strategy.

The MOU describes specific aspects of the agreement. In general, cooperating agencies share skills and resources to help shape BLM land use plans and environmental analyses that better reflect the policies, needs, and conditions of their jurisdictions and the citizens they represent. Cooperating agencies accept obligations to contribute staff time, develop and review analyses for which they have particular expertise, and fund their own participation. The MOU contains specific details regarding that contribution, and primarily identifies collaboration through meetings and potential data sharing.

Given the large geographic scale of the project – covering southern Idaho and southwestern Montana – most coordination as a cooperating agency for this effort will be done in a virtual environment (i.e. via phone, conference calls and electronic mail) and hosted by the BLM.

We have also included the BLM's Cooperating Agency Desk Guide. The guide is a great resource for cooperating agencies and provides Department of the Interior regulations and policies for land use planning.

We look forward to working with you throughout the development of this project. If you have any questions or concerns please contact Brent Ralston at (208) 373-3812 or [bralston@blm.gov](mailto:bralston@blm.gov). There is also information regarding Cooperating Agencies available online at: [http://www.blm.gov/wo/st/en/info/nepa/cooperating\\_agencies.html](http://www.blm.gov/wo/st/en/info/nepa/cooperating_agencies.html).

The BLM will be hosting coordination calls with our formal cooperating agencies. We will continue to update you on any upcoming coordination calls, meetings and milestones in the planning process.

We appreciate your continued interest in this project and look forward to working with you in the future.

Sincerely,

Steven A. Ellis  
Idaho BLM State Director

## Idaho/Southwest Montana Subregion Sage-Grouse RMP/EIS

### Cooperating Agency Call

July 2, 2014 10:00 a.m. MST

#### Attendance

BLM: Brent Ralston

Counties: Bill Frederiksen – Clark County; Doyle Lamb – Custer County; Ladd Carter – Bingham County

#### Action Items

- Review the proposed plan and components and send Brent comments in the comment form provided by July 18<sup>th</sup>.

#### Meeting Minutes

##### *Project Update*

- Working with the Washington Office and National USFWS office regarding direction for the proposed plan. Have been approved to move forward with the proposed plan. Preparing administrative draft proposed plan.
- A review package with the proposed decisions will go out today or tomorrow to the counties. Asking for a 2 week review period for comments, concerns, and questions. Look at the management actions and see if there's anything in conflict with the county land use plans.
- The proposed plan (Alternative G) contains about 40 pages of management decisions broken down by program area. Brent will send two electronic files: 1) proposed decisions (40 pages); 2) supporting documentation/appendices that are directly associated with the proposed decisions and provide more detail and background (150 pages). Brent will also send a comment form with directions. Send comments to Brent by **July 18<sup>th</sup>**.
- A number of federal and state cooperating agencies have been involved in preparing the plan (e.g., Forest Service, ID Office of Species Conservation, IDFG, Montana FWP).
- Expect to compile administrative final EIS by mid-late august and will share the full document around that time.
- The proposed plan will be sent to all county cooperators, including INL and Craters of the Moon, as well as the tribes. Plan has been shared with the state. Will not be distributed widely before September at the earliest.

##### *Proposed Plan Overview*

- Proposed plan was prepared by combining key components of Alternatives D and E. While the text will not be exactly the same, it is similar to both of those alternatives.
- Brent reviewed the proposed plan section by section as summarized below.
- Summary of all decisions up front.

- Discussion of goals and objectives; includes habitat treatments (still working on acreages)
- General direction – following laws, the last couple items relate to RDFs, BMPs, seasonal restrictions, and lek buffer distances for implementation activities (details included as an appendix).
- Coordination with other agencies
- Management Areas – two maps: 1) Conservation Areas – Similar to Alternative E but added one Conservation Area for Montana; 2) Three management zones (similar to Alternative E) – Core (CMZ), Important (IMZ), and General (GMZ). Montana does not have any Important Management Zones.
- Adaptive management – Based on habitat and population measurements. Soft trigger – look at site-specific changes; hard trigger would require a land use plan amendment. Similar to Alternative E, if a hard trigger is tripped, IMZ would be managed as CMZ.
- Baseline map – will continue to use key habitat map to track the change in acres for adaptive management. This map is updated on an annual basis.
- Anthropogenic disturbance – included a 3% disturbance threshold based on USFWS concerns. Evaluated percent disturbance (large infrastructure, does not include fences, two-track roads, or range improvement projects) within CMZ and IMZ by Conservation Area. All areas range between 0.8 percent to 2.2 percent development.
- Exception criteria for CMZ and development criteria for IMZ – they are the same as Alternative E, though some changes have been made for clarity.
- Mitigation – setting up a mitigation board at the state level. Still working out the details. Develop a state-wide mitigation strategy built on the Idaho framework for mitigation.
- Wildfire: a number of actions related to preparedness, suppression, fuels management and ES&R:
  - Working with the RFPAs and pre-season coordination efforts.
  - Complete Wildfire and Invasive Species Assessments to help prioritize areas on a field office basis; identify areas for fuel breaks, etc. GRSG is the highest priority after life and property.
  - Fuels management, including targeted grazing, using existing ROWs.
  - ES&R primarily with native seeds.
- Habitat restoration and vegetation management – similar to some of the ES&R management, it is just done under a different program. Focus on Stage 1 and 2 juniper stands – rapid recovery because understory still there.
- Lands and realty – linked closely with the anthropogenic disturbance threshold and the criteria for when projects would be allowed. Identify ROW exclusion, avoidance, and avoidance. All CMZ and IMZ are ROW avoidance – must meet the criteria. Some exclusions in CMZ: wind, solar, hydropower, nuclear, and commercial service airports. Land tenure adjustments described.
- Fluid mineral development – low and no potential areas within CMZ are closed; moderate and high potential areas in CMZ and IMZ are open with NSO. Geothermal has a different potential map.

- Phosphate – no Known Phosphate Leasing Areas (KPLAs) in CMZ. Outside of KPLAs, CMZ is closed. IMZ in KPLA open; outside KPLAs, must meet the development criteria.
- Grazing – point to rangeland health assessment process.
- Wild horse and burros – no changes
- Travel management – limited to existing routes unless already identified as an open play area. Follow up with travel management planning to designate the routes.
- Monitoring



# IDAHO AND SW MONTANA BLM MANAGEMENT ACTIONS AND FOREST SERVICE PLAN COMPONENTS – A CROSSWALK

BLM Management Actions	Forest Service Plan Components
<p><b>MA-OBJ-1 (Management Area – Objective):</b> Maintain a resilient population of GRSG in Idaho and Southwestern Montana.</p>	<p><b>GRSG-GEN-DC-001-Desired Condition</b> – The landscape for greater sage-grouse encompasses large contiguous areas of native vegetation, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist without invasive species, which have variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.</p> <p><b>GRSG-GEN-DC-002-Desired Condition</b> – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.</p>
<p><b>MA-OBJ-2:</b> Designate GRSG management areas and associated management to maintain a resilient population and to designate strategically located adjacent areas to provide a buffer from unpredictable habitat loss such as wildfire to the resilient population areas.</p>	<p><b>GRSG-GEN-DC-001-Desired Condition</b> – The landscape for greater sage-grouse encompasses large contiguous areas of native vegetation, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist without invasive species, which have variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.</p>

BLM Management Actions	Forest Service Plan Components
	<p><b>GRSG-GEN-DC-002-Desired Condition</b> – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.</p>
<p><b>MA-OBJ-3:</b> Identify and strategically protect larger intact sagebrush areas and areas of lower fragmentation to maintain GRSG population persistence.</p>	<p><b>GRSG-GEN-DC-001-Desired Condition</b> – The landscape for greater sage-grouse encompasses large contiguous areas of native vegetation, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist without invasive species, which have variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.</p> <p><b>GRSG-GEN-DC-002-Desired Condition</b> – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.</p>
<p><b>HM-OBJ-1 (Habitat Management):</b> Maintain or make progress toward at least 70 percent of lands within PHMAs and IHMAs capable of producing sagebrush at 10 to 25 percent canopy cover and conifers absent to uncommon within 1.86 miles of occupied leks.</p>	<p><b>GRSG-GEN-DC-001-Desired Condition</b> – The landscape for greater sage-grouse encompasses large contiguous areas of native vegetation, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist without invasive species, which have variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.</p>

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**BLM Management Actions**

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**Forest Service Plan Components**

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**HM-OBJ-2:**Incorporate GRSG Seasonal Habitat Objectives (Table 2-3) into the design of projects or activities, as appropriate, based on site conditions and ecological potential, unless achievement of fuels management objectives require additional reduction in sagebrush cover to meet strategic protection of GRSG habitat and conserve habitat quality for the species or at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:

- A specific objective is not applicable to the site-specific conditions of the project or activity;
- An alternative objective is determined to provide equal or better protection for GRSG or its habitat (based on appropriate scientific findings); or
- Analysis concludes that following a specific objective would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.
- These habitat objectives in Table 2-3 summarize the characteristics that research has found represent the seasonal habitat needs for GRSG. The specific seasonal components identified in the table were adjusted based on local science and monitoring data to define the range of characteristics used in this sub-region. Thus, the habitat objectives provide the broad vegetative conditions we strive to obtain across the landscape that indicate the seasonal habitats used by GRSG. These habitat indicators are consistent with the rangeland health indicators used by the BLM.
- The habitat objectives will be part of the GRSG habitat assessment

**GRSG-GEN-DC-002-Desired Condition** – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.

**GRSG-GEN-DC-003-Desired Condition** – In all greater sage-grouse seasonal habitats, including all seasonal habitats, 70% of lands capable of producing sagebrush have 10 to 30% sagebrush canopy cover and less than 10% conifer canopy cover. In addition, within breeding and nesting habitat, sufficient herbaceous vegetation structure and height provides overhead and lateral concealment for nesting and early brood rearing life stages. Within brood rearing habitat, wet meadows and riparian areas sustain a rich diversity of perennial forb species relative to site potential. Within winter habitat, sufficient sagebrush height and density provides food and cover for greater sage-grouse during this seasonal period. Specific desired conditions for greater sage-grouse based on seasonal habitat requirements are in table 2-6.

**GRSG-GRSGH-ST-028-Standard** – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - *Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.*

**GRSG-GRSGH-GL-029-Guideline** – Sagebrush removal in GRSG breeding and nesting and wintering habitats should be avoided unless necessary to support attainment of desired habitat conditions (Table 2-6).

**GRSG-GRSGH-GL-032-Guideline** - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at

BLM Management Actions	Forest Service Plan Components
<p>to be used during land health evaluations (see Monitoring Framework, Appendix E). These habitat objectives are not obtainable on every acre within the designated GRSG habitat management areas. Therefore, the determination on whether the objectives have been met will be based on the specific site's ecological ability to meet the desired condition identified in the table.</p> <ul style="list-style-type: none"> <li>• All BLM use authorizations will contain terms and conditions regarding the actions needed to meet or progress toward meeting the habitat objectives. If monitoring data show the habitat objectives have not been met nor progress being made towards meeting them, there will be an evaluation and a determination made as to the cause. If it is determined that the authorized use is a cause, the use will be adjusted by the response specified in the instrument that authorized the use.</li> </ul>	<p>an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p> <p><b>GRSG-GRSGH-GL-034-Guideline</b> – In PHMA, IHMA and SFAs, vegetation treatment projects should only be conducted if they restore, enhance, or maintain desired conditions (Table 2-6).</p>
<p><b>CC-1:</b> Collaborate, coordinate and utilize cooperative planning efforts to implement and monitor activities to achieve desired conditions and to maximize the utilization of available funding opportunities. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, public lands permit holders and non-governmental organizations.</p>	<p>No similar management direction.</p>
<p><b>CC-2:</b> Develop a cooperative MOU between the BLM, Forest Service and State of Idaho to establish the State of Idaho as a cooperating agency during implementation of the final decision. The MOU would identify responsibilities, role and interaction of the BLM, Forest Service and State of Idaho. Montana BLM will participate as appropriate on Montana's Sage-grouse Oversight Team to facilitate coordination and implementation of BLM's final decision and Montana's Executive Order No. 10-2014.</p>	<p>No similar management direction.</p>
<p><b>CC-3:</b> The BLM and Forest Service would consider any recommendations from the Governor of Idaho as a result of evaluation completed by the Sage-Grouse Implementation Task Force.</p>	<p>No similar management direction.</p>

BLM Management Actions	Forest Service Plan Components
<p><b>CC-4:</b> Idaho: The BLM would coordinate with the State of Idaho and the Idaho Sage-Grouse Implementation Task Force regarding proposed management changes, the implementation of conservation measures, mitigation, and site-specific monitoring, related to adaptive management, anthropogenic disturbance and livestock grazing (Appendix M).</p>	<p>No similar management direction.</p>
<p><b>CC-5:</b> Montana: The BLM would coordinate with the State of Montana and the Montana Sage-grouse Oversight Team regarding proposed management changes, the implementation of conservation measures, mitigation, and site-specific monitoring, related to adaptive management and anthropogenic disturbance (Appendix M).</p>	<p>No similar management direction.</p>
<p><b>CC-6:</b> At the state level, BLM and Forest Service would coordinate with IDFG, MFWP, USFWS, and other conservation partners in collaborative efforts with adjacent states (Oregon, Nevada, Utah, Montana, Wyoming) in GRSG MZs IV and II to evaluate GRSG habitat and population status and trends and make appropriate regional recommendations for GRSG conservation at broader scales.</p>	<p>Included in BLM management action.</p>
<p><b>CC-7:</b> At the state level, BLM and Forest Service would coordinate with the appropriate WAFWA Sage-grouse Technical Committee to develop consistent population and habitat monitoring approaches that facilitate GRSG conservation at the MZ scale.</p>	<p>Include in BLM management action.</p>
<p><b>MA-1 (Management Area):</b> Designate five GRSG Conservation Areas (see Chapter 8, Glossary) within the sub-region to form the geographic basis for achieving population objectives; evaluating the disturbance density and adaptive regulatory triggers; and tailor adaptive management responses. These conservation areas are depicted in Figure 2-1. These areas are referred to as Mountain Valleys, Desert, West Owyhee, Southern and Southwestern Montana Conservation Areas.</p> <p>Conservation Area Description:</p> <ul style="list-style-type: none"> <li>Mountain Valleys Conservation Area – generally located north of the Snake River Plain, including GRSG habitat in the Salmon and Challis areas, and habitat in west-central population area. It</li> </ul>	<p>No similar management direction.</p>

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**BLM Management Actions****Forest Service Plan Components**

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extends west from Rexburg, north and west of Highway 33 to Howe, north and west of Highway 33/22 to Arco, north and west of Highway 26/20/93 to Carey, north and west of Highway 20 west to Hill City, north and west of Highway 20 to the Dylan Karaus Road, west to Canyon Creek. Canyon Creek to the confluence with the Snake River form the western boundary.

- Desert Conservation Area – located north of the Snake River and south of the Mountain Valleys Conservation Area. It extends from the confluence of Canyon Creek and the Snake River, eastward to Idaho Falls. The Snake River and Henry’s Fork form the eastern boundary.
- West Owyhee Conservation Area – located south of the Snake River and west of the Bruneau River.
- Southern Conservation Area – located south of the Snake River and east of the Bruneau River, including East Idaho uplands and Bear Lake Plateau, and the Utah portion of the Sawtooth National Forest in Box Elder County.
- Southwestern Montana – located in southwestern Montana - encompassing the Dillon Butte BLM Field Office and Beaverhead-Deerlodge National Forest boundaries (the Butte RMP is not being amended and since there are limited GRSG federal GHMAs, management actions do not apply in the Butte Field Office).
- In general, GRSG habitats in the Desert and West Owyhee CAs are relatively contiguous, while those in the Mountain Valleys and Southern CAs tend to be more fragmented due to more complex topography, and elevational differences and/or effects from wildfires, agriculture, urbanization or other factors.

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**MA-2:** Within each Conservation Area designate GRSG Habitat Management Areas: Priority, Important and General Habitat Management Areas (Figure 2-2). Priority Habitat Management Areas (PHMAs) focus on conserving the two key meta-populations in the sub-region. PHMA encompasses areas with the highest conservation value to GRSG, based on the presence of larger leks, habitat extent, important movement and connectivity corridors and winter habitat.

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No similar management direction.

BLM Management Actions	Forest Service Plan Components
<p>PHMAs include adequate area to accommodate continuation of existing land uses and landowner activities. Important Habitat Management Areas (IHMAs) contain additional habitat and populations that provide a management buffer for the PHMA and to connect patches of PHMA. IHMA encompasses areas of generally moderate to high conservation value habitat and/or populations and in some Conservation Areas includes areas beyond those identified by USFWS as necessary to maintain redundant, representative and resilient populations (Priority Areas for Conservation (PACs)). IHMAs are typically adjacent to PHMAs but generally reflect somewhat lower GRSG population status and/or reduced habitat value due to disturbance, habitat fragmentation or other factors. There are no IHMAs designated within the Southwestern Montana Conservation Area. General Habitat Management Areas (GHMAs) encompass habitat that is outside of PHMAs or IHMAs. GHMAs contain approximately 10 percent of the occupied leks that are also of relatively low male attendance compared to leks in PHMA or IHMA. GHMAs are generally characterized by lower quality disturbed or patchy habitat of low lek connectivity.</p>	
<p><b>MA-3:</b> In Idaho, Designate PHMA and IHMA to encompass 90 percent of the breeding males in Idaho. In Montana, designate PHMA to encompass Montana Fish, Wildlife, and Parks 2009 Greater Sage Grouse Core Area designations.</p>	<p>No similar management direction.</p>
<p><b>MA-4:</b> Annually prioritize Conservation Areas at the state scale considering results of the annual adaptive regulatory trigger evaluations relative to implementation of restoration and mitigation activities.</p>	<p>No similar management direction.</p>
<p><b>MA-5:</b> Prioritize activities and mitigation to protect, enhance and restore GRSG habitats (i.e., fire suppression activities, fuels management activities, vegetation treatments, invasive species treatments etc.) first by Conservation Area, if appropriate (Conservation Area under adaptive management or at risk of engaging adaptive management), followed by PHMAs, then IHMAs then GHMAs within the Conservation Areas. Local priority areas within these areas will be further refined as a result of completing the GRSG Wildfire and</p>	<p>Direction will be included in the Implementation Guide.</p>

BLM Management Actions	Forest Service Plan Components
<p>Invasive Species Habitat Assessments as described in Appendix D. This could include projects outside GRSG habitat when those projects would provide a benefit to GRSG habitat.</p>	
<p><b>MA-6:</b> The management area map and Biologically Significant Unit (BSU) baseline map would be re-evaluated in conjunction with plan evaluation processes (i.e. approximately every 5 years). This re-evaluation could indicate the need to adjust PHMA, IHMA or GHMA or the habitat baseline. These adjustments could occur upon completion of the appropriate analysis (plan amendment) to review the allocation decisions based on the map. Results from the Wildfire and Invasive Species Assessments, such as identified focal or emphasis areas would also be used to help inform mapping adjustments during this evaluation.</p>	<p>Direction will be included in either the Implementation Guide or the Record of Decision.</p>
<p><b>MA-7:</b> GRSG habitat within the project area would be assessed during project-level NEPA analysis within the management area designations (PHMA, IHMA, GHMA). Project proposals and their effects would be evaluated based on the habitat and values affected</p>	<p>No similar management direction.</p>
<p><b>MA-8:</b> Idaho BLM will annually update the Key Habitat map as described in Appendix F, in order to reflect habitat changes resulting from wildfire, succession, and vegetation treatments that occurred or were observed since the last update. Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year. This map also identifies potential restoration areas (perennial grassland annual grasslands, conifer encroachment and recent burns). This map a broad scale current vegetation map that changes as habitat is lost or restored. The Key Habitat Map is not an allocation decision such as PHMA, IHMA, and GHMA. Updates to the map will also occur if it is determined that mapping errors or omissions have occurred, or that radio-telemetry studies indicate that GRSG are consistently utilizing an area. Updates are also intended to capture recommendations by the field offices, GRSG Local Working Groups, or agency partners in GRSG conservation. Project-level evaluations of GRSG habitat during the NEPA process may also be used to inform the annual update.</p>	<p>No similar management direction.</p>



BLM Management Actions	Forest Service Plan Components
<p><b>MA-9:</b> Areas of habitat outside of delineated management areas identified during the Key habitat update process would be evaluated during site specific NEPA for project level activities and GRSG required design features (Appendix B), seasonal timing restrictions (Appendix C) and buffers (Appendix B) would be included as part of project design. These areas would be further evaluated during plan evaluation and the 5-year update to the management areas, to determine whether they should be included as PHMAs, IHMAs, or GHMAs.</p>	<p>No similar management direction.</p>
<p><b>MA-10:</b> Designate Sagebrush Focal Areas (SFA) as shown on Figure 2-3. SFAs will be managed as PHMA, with the following additional management:</p> <p>Recommended for withdrawal from the General Mining Act of 1872, as amended, subject to valid existing rights.</p> <p>Managed as NSO, without waiver, exception, or modification, for fluid mineral leasing.</p> <p>Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions).</p> <p>Areas of non-PHMA mapped within the SFA boundary will not be managed as SFA, except for the Donkey Hills ACEC and three Forest Service parcels in the Lost River Range, Idaho (Borah Peak, Big Flat Top Mountain, and Copper Basin Knob).</p>	<p>Sagebrush focal areas on National Forest System lands are mapped and will be included in the Record of Decision.</p> <p><b>GRSG-M-FMUL-ST-079-Standard</b> – In sagebrush focal areas, there will be no surface occupancy and no waivers, exceptions, or modifications for fluid mineral leasing.</p> <p><b>GRSG-M-FML-GL-086-Guideline</b> – On existing Federal leases in priority and important habitat management areas and sagebrush focal areas, when surface occupancy cannot be restricted due to valid existing rights or development requirements, disturbance and surface occupancy should be limited to areas least harmful to greater sage-grouse based on vegetation, topography, or other habitat features.</p>
<p><b>AM-1 (Adaptive Management):</b> Idaho: Use hard and soft population and habitat triggers to determine an appropriate management response as described in AM-6 to AM-16. Hard and soft triggers responses are applied at the Conservation Area (MA-1) scale (Appendix G).</p>	<p><b>GRSG-AM-ST-010-Standard</b> – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from GRSG conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix G).</p> <p><b>GRSG-AM-ST-011-Standard</b> – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g.,</p>

BLM Management Actions	Forest Service Plan Components
	extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering and conditions (Appendix G).
<b>AM-2:</b> Utilize monitoring information collected through the Monitoring Framework (Appendix E) to determine when adaptive regulatory triggers have been met.	Direction will be included in the Implementation Guide.
<b>AM-3:</b> Idaho: BLM and Forest Service would maintain GRSG habitat information, through use of the Key Habitat map or latest sagebrush/vegetation map, which would be used to track and identify habitat changes to assess the habitat trigger in the adaptive management approach. Key habitat map updates are made each winter by BLM in coordination with the Forest Service and IDFG, using the process described in Appendix F.	Direction will be included in the Implementation Guide.
<b>AM-4:</b> Idaho: BLM would coordinate with the IDFG regarding population information collected and maintained by the IDFG to track and identify population changes to assess the population trigger in the adaptive management approach.	Standard operating procedure.
<b>AM-5:</b> Idaho: Twice each year the applicable monitoring information would be reviewed to determine if any adaptive management triggers have been met.	Direction will be included in the Implementation Guide.
<b>AM-6:</b> Idaho: Adaptive habitat regulatory triggers would be individually calculated across all ownerships within the BSUs (Appendix G). The BSU is defined as the IDFG modeled nesting and wintering habitat (IDFG 2013, unpublished data) within PHMAs and IHMAs within a Conservation Area. The sagebrush component of the BSU is represented by the Key habitat within the BSU present during the 2011 baseline and as mapped during subsequent annual Key habitat map updates. Key habitat is defined as areas of generally intact sagebrush that provide GRSG habitat during some portion of the year (ISAC 2006).	Direction will be included in the Implementation Guide.

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**BLM Management Actions****Forest Service Plan Components**

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**AM-7:** Adaptive Regulatory Criteria for Habitat Hard Triggers are defined as:

- A 20 percent loss of Key Habitat within the BSU of the PHMA of a Conservation Area when compared to the 2011 baseline, inclusive of all land ownerships or
- A 20 percent loss of Key Habitat within the BSU of the IHMA of a Conservation Area when compared to the 2011 baseline.

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**AM-8:** Adaptive Regulatory Criteria for Habitat Soft Triggers are defined as:

A 10 percent loss of Key Habitat within the BSU of the PHMA of a Conservation Area when compared to the 2011 baseline; or

A 10 percent loss of Key Habitat within the BSU of the IHMA of a Conservation Area when compared to the 2011 baseline.

**GRSG-AM-ST-010-Standard** – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from greater sage-grouse conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-011-Standard** – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering local knowledge and conditions (Appendix Z - Adaptive Management Guidance and Sideboards).

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**GRSG-AM-ST-010-Standard** – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from greater sage-grouse conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-011-Standard** – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering local knowledge and conditions (Appendix Z - Adaptive Management Guidance and Sideboards).

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**BLM Management Actions**

**AM-9:** Adaptive Regulatory Criteria for Population Hard Triggers are defined as:

A 20 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ( $\lambda$ ) significantly below 1.0 within PHMA within a Conservation Area over the same 3-year period; or

A 20 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ( $\lambda$ ) significantly below 1.0 within IHMA within a Conservation Area over the same 3-year period.

Significance is defined by the 90 percent confidence interval around the current 3-year finite rate of change. If the 90 percent confidence interval is less than, and does not include 1.0, then the finite rate of change is considered significant. The finite rate of change and variance will be calculated following Garton et al. (2011).

**AM-10:** Adaptive Regulatory Criteria for Population Soft Triggers are defined as:

A 10 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ( $\lambda$ ) below 1.0 within PHMA within a Conservation Area over the same 3-year period; or

A 10 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum male baseline and a finite rate of change ( $\lambda$ ) below 1.0 within IHMA within a Conservation Area over the same 3-year period.

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**Forest Service Plan Components**

**GRSG-AM-ST-010-Standard** – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from greater sage-grouse conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-011-Standard** – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering local knowledge and conditions (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-010-Standard** – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from greater sage-grouse conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix Z - Adaptive Management Guidance and Sideboards).

**GRSG-AM-ST-011-Standard** – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering local knowledge and conditions (Appendix Z - Adaptive Management Guidance and Sideboards).

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BLM Management Actions	Forest Service Plan Components
<p><b>AM-11:</b> When any of the Adaptive Regulatory Criteria for Soft Triggers have been met the Implementation Team would evaluate causal factors and recommend additional potential implementation level activities (Appendix G).</p>	<p><b>GRSG-AM-ST-011-Standard</b> – If a soft trigger is identified, apply more conservative or restrictive implementation measures (e.g., extending seasonal restrictions for seasonal surface disturbing activities, modifying seasons of use for livestock grazing, and applying additional restrictions on discretionary activities) for the specific causal factor in the decline of populations and/or habitats, considering local knowledge and conditions (Appendix G).</p>
<p><b>AM-12:</b> When any of the Adaptive Regulatory Criteria for Hard Triggers have been met then all PHMA management actions would be applied to the IHMA within that Conservation Area and the Implementation Team would evaluate causal factors and recommend additional potential implementation level activities.</p>	<p><b>GRSG-AM-ST-010-Standard</b> – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from GRSG conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix G). Included in Appendix G.</p>
<p><b>AM-13:</b> If an adaptive regulatory trigger is tripped and livestock grazing is identified as a probable limiting factor then adjustments would follow the Adaptive Grazing Management Response described in Appendix G.</p>	<p>Included in Appendix G.</p>
<p><b>AM-14:</b> Remove any adaptive management response when the habitat or maximum male population count (i.e. 3-year average) returns to or exceeds the 2011 baseline levels within the associated Conservation Area in accordance with the Adaptive Management Strategy (Appendix G). In such a case, changes in management allocations resulting from a tripped trigger would revert back to the original allocation (AM-12).</p>	<p>Included in Appendix G.</p>
<p><b>AM-15:</b> Montana: Follow the NPT Adaptive Management Guidance and Sideboards. When a hard trigger is hit in a BSU, the designated response will be put in place in that BSU. Triggers and responses have been developed with local state and USFWS experts (Appendix I).</p>	<p><b>GRSG-AM-ST-010-Standard</b> – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from GRSG conservation objectives. Upon reaching a hard trigger, an appropriate component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix G).</p>
<p><b>AM-16:</b> Idaho and Montana: When a hard trigger is hit in a BSU within a PAC that has multiple BSUs, including those that cross state lines, the WAFWA Management Zone Greater Sage-Grouse Conservation</p>	<p><b>GRSG-AM-ST-010-Standard</b> – If a hard trigger is identified, immediate action is necessary to stop a severe deviation from GRSG conservation objectives. Upon reaching a hard trigger, an appropriate</p>

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<p>Team will convene to determine the causal factor, put project-level responses in place, as appropriate and discuss further appropriate actions to be applied. The team will also investigate the status of the hard triggers in other BSUs within the PAC and will invoke the appropriate plan response.</p>	<p>component of a more restrictive alternative analyzed in the environmental impact statement will be implemented. The Forest Service will review available and pertinent data in coordination with greater sage-grouse biologists from multiple agencies (Appendix G).</p>
<p><b>AD-1 (Anthropogenic Disturbance):</b> For Idaho and Montana, if the 3 percent anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) within GRSG PHMA (or IHMA in Idaho) Habitat Management Areas in any given BSU, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the General Mining Law of 1872, as amended, valid existing rights, etc.) will be permitted by BLM within GRSG PHMAs and IHMAs in any given BSU until the disturbance has been reduced to less than the cap. As measured according to the Monitoring Framework (Appendix G) for the intermediate scale.</p> <p>For Idaho, if the 3 percent disturbance cap is exceeded on all lands (regardless of land ownership) within a proposed project analysis area (Appendix G) in a PHMA (or IHMA in Idaho), then no further anthropogenic disturbance will be permitted by BLM until disturbance in the proposed project analysis area has been reduced to maintain the area under the cap (subject to applicable laws and regulations, such as the General Mining Law of 1872, as amended, valid existing rights, etc.).</p> <p>For Montana, if the 3 percent disturbance cap is exceeded on lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a project analysis area in PHMAs, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.) will be permitted by BLM within PHMA in a project analysis area until the disturbance has been reduced to less than the cap. If the BLM determines that the State of Montana has adopted a GRSG Habitat Conservation Program that contains comparable components to those</p>	<p><b>GRSG-GEN-ST-004-Standard</b> –In PHMA, IHMA and SFA, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat within the BSU and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3 percent cap (Appendix G).</p>

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found in the State of Wyoming's Core Area Strategy including an all lands approach for calculating anthropogenic disturbances, a clear methodology for measuring the density of operations, and a fully operational Density Disturbance Calculation Tool, the 3% disturbance cap will be converted to a 5% cap for all sources of habitat alteration within a project analysis area.

For Idaho the BSU (Figure 2-3) is defined as the currently mapped nesting and wintering habitat within PHMA and IHMA within a Conservation Area, inclusive of all ownerships for evaluation. For Montana the BSU is defined as the PHMA in Montana. Anthropogenic disturbance excludes habitat disturbance from wildfire and fuels management activities and includes activities described in Table 2-4. For Idaho this disturbance is measured by direct footprint or by ROW width for linear features (powerlines, pipelines and roads). For Montana disturbance is measured similar to the Wyoming Disturbance Density Calculation Tool process described in Appendix G.

Subject to applicable laws and regulations and valid existing rights, if the average density of one energy and mining facility per 640 acres (the density cap) is exceeded on all lands (regardless of land ownership) in the Priority Habitat Management Area within a proposed project analysis area, then no further disturbance from energy or mining facilities will be permitted by BLM: (1) until disturbance in the proposed project analysis area has been reduced to maintain the limit under the cap; or (2) unless the energy or mining facility is co-located into an existing disturbed area.

**AD-2:** New anthropogenic disturbances within PHMA or IHMA within a Conservation Area where the disturbance cap is already exceeded from any source or where the proposed development would result in the cap being exceeded would not be allowed in within that Conservation Area until enough habitat has been restored within that Conservation Area to maintain the area under this cap (subject to valid existing rights).

**GRSG-GEN-ST-004-Standard** – In PHMA, IHMA and SFA, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat within the BSU and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3 percent cap (Appendix G).

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**AD-3:** PHMA (Idaho only): Anthropogenic Disturbance Screening Criteria. In order to avoid surface-disturbing activities in PHMA, priority will be given to development (including ROWs, fluid minerals and other mineral resources subject to applicable stipulations) outside of PHMA. When authorizing development in PHMA, priority will be given to development in non-habitat areas first and then in the least suitable habitat for GRSG. In addition to the PHMA and IHMA Anthropogenic Disturbance Development Criteria (AD-4), the following criteria must all be met in the project screening and assessment process:

- a. The population trend for the GRSG within the associated Conservation Area is stable or increasing over a three-year period and the population levels are not currently engaging the adaptive management triggers (this applies strictly to new authorizations; renewals and amendments of existing authorizations would not be subject to this criteria when it can be shown that long-term impacts from those renewals or amendments would be substantially the same as the existing development);
- b. The development with associated mitigation would not result in a net loss of GRSG Key habitat and mitigation would provide a net conservation benefit to the respective PHMA;
- c. The project and associated impacts would not result in a net loss of GRSG Key habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant Conservation Area (the project would be outside Key habitat in areas not meeting desired habitat conditions or the project would provide a benefit to habitat areas that are functioning in a limited way as habitat);
- d. Cannot be reasonably accomplished outside of the PHMA; or can be either: 1) developed pursuant to a valid existing authorization; or 2) is co-located within the footprint of existing infrastructure (proposed actions would not increase the 2011 authorized footprint and associated impacts more than 50 percent, depending

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**GRSG-M-FML-GL-086-Guideline** – On existing Federal leases in priority and important habitat management areas and sagebrush focal areas, when surface occupancy cannot be restricted due to valid existing rights or development requirements, disturbance and surface occupancy should be limited to areas least harmful to greater sage-grouse based on vegetation, topography, or other habitat features.

**GRSG-GEN-ST-005-Standard** - In priority and important management areas and sagebrush focal areas, only allow new authorized land uses if the residual impacts to greater sage-grouse or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation as addressed in the Mitigation Framework (Appendix X).

**GRSG-LR-SUA-ST-020-Standard** – In priority, important, and general habitat management areas and sagebrush focal areas, co-locate new infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers) with existing infrastructure to limit disturbance to the smallest footprint, or where it best limits impacts to greater sage-grouse or their habitats. If co-location of new infrastructure cannot be accomplished, locate it adjacent to existing infrastructure, roads, or already disturbed areas.

**GRSG-LR-SUA-GL-021-Guideline** – In priority management areas and sagebrush focal areas, outside of existing designated corridors and rights-of-way, new transmission lines and pipelines should be buried to limit disturbance to the smallest footprint unless explicit rationale is provided that the biological impacts to greater sage-grouse and its habitat are being avoided. When new transmission lines and pipelines are not buried, locate them adjacent to existing transmission lines and pipelines



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<p>on industry practice.</p> <ul style="list-style-type: none"> <li>e. Development could be implemented adhering to the required design features (RDF) described in Appendix B;</li> <li>f. The project would not exceed the disturbance cap (AD-1).</li> <li>g. The project has been reviewed by the State Implementation Team and recommended for consideration by the Idaho Governor.</li> </ul>	<p><b>GRSG-GEN-DC-002-Desired Condition</b> – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.</p> <p><b>GRSG-GEN-ST-004-Standard</b> – In priority and important habitat management areas and sagebrush focal areas, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3% of the total greater sage-grouse habitat within the Biologically Significant Unit and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3% cap (Appendix Z – Disturbance Cap Guidance).</p>
<p><b>AD-4:</b> The following Anthropogenic Disturbance Development Criteria must be met in the screening and assessment process for proposals in PHMA and IHMA to discourage additional disturbance in PHMAs and IHMAs (as described in LR-1 and LR-2; applies to Idaho only):</p> <ul style="list-style-type: none"> <li>a. Through coordination with the USFWS and State of Idaho (as described in CC-1), it is determined that the project cannot be achieved, technically or economically, outside of this management area; and</li> <li>b. The project siting and/or design should best reduce cumulative impacts and/or impacts on GRSG and other high value natural, cultural, or societal resources; this may include co-location within the footprint for existing infrastructure, to the extent practicable; and</li> <li>c. The project results in a net conservation gain to GRSG Key habitat or with beneficial mitigation actions reduces habitat fragmentation or other threats within the Conservation Area; and</li> <li>d. The project design mitigates unavoidable impacts through</li> </ul>	<p><b>GRSG-M-FML-GL-086-Guideline</b> – On existing Federal leases in priority and important habitat management areas and sagebrush focal areas, when surface occupancy cannot be restricted due to valid existing rights or development requirements, disturbance and surface occupancy should be limited to areas least harmful to greater sage-grouse based on vegetation, topography, or other habitat features.</p> <p><b>GRSG-GEN-ST-005-Standard</b> - In priority and important management areas and sagebrush focal areas, only allow new authorized land uses if the residual impacts to greater sage-grouse or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation as addressed in the Mitigation Framework (Appendix X).</p> <p><b>GRSG-LR-SUA-ST-020-Standard</b> – In priority, important, and general habitat management areas and sagebrush focal areas, co-locate</p>

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<p>appropriate compensatory mitigation; and</p> <p>e. Development could be implemented adhering to the RDFs described in Appendix B.</p> <p>f. The project would not exceed the disturbance cap (AD-1).</p> <p>In Montana, the BLM would apply the project/action screen and mitigation process (Appendix I).</p>	<p>new infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers) with existing infrastructure to limit disturbance to the smallest footprint, or where it best limits impacts to greater sage-grouse or their habitats. If co-location of new infrastructure cannot be accomplished, locate it adjacent to existing infrastructure, roads, or already disturbed areas.</p> <p><b>GRSG-LR-SUA-GL-021-Guideline</b> – In priority management areas and sagebrush focal areas, outside of existing designated corridors and rights-of-way, new transmission lines and pipelines should be buried to limit disturbance to the smallest footprint unless explicit rationale is provided that the biological impacts to greater sage-grouse and its habitat are being avoided. When new transmission lines and pipelines are not buried, locate them adjacent to existing transmission lines and pipelines</p> <p><b>GRSG-GEN-DC-002-Desired Condition</b> – Anthropogenic disturbance is focused in non-habitat areas outside of priority, important, and general habitat management areas and sagebrush focal areas. Disturbance in general habitat management areas are limited, and there is little to no disturbance in priority and important habitat management areas and sagebrush focal areas except for valid existing rights and existing authorized uses.</p> <p><b>GRSG-GEN-ST-004-Standard</b> – In priority and important habitat management areas and sagebrush focal areas, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3% of the total greater sage-grouse habitat within the Biologically Significant Unit and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3% cap (Appendix Z – Disturbance Cap Guidance).</p>
<p><b>AD-5:</b> Co-locating new infrastructure within existing ROWs and maintaining and upgrading ROWs is preferred over the creation of new ROWs or the construction of new facilities in all management</p>	<p><b>GRSG-LR-SUA-ST-020-Standard</b> – In PHMA, IHMA, GHMA and SFA, co-locate new infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers) with existing infrastructure to limit disturbance to the smallest footprint, or</p>

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area. Colocation for various activities is defined as:

**Communication Sites** – The installation of new equipment/facilities on or within or adjacent to existing authorized equipment/facilities or within a communication site boundary as designated in the Communication Site Plan.

**Electrical Lines** – Installation of new ROWs adjacent to current ROWs boundaries, not necessarily placed on the same power poles.

**Other Rights-of-Way** – The installation of new ROWs within the existing footprint of an approved ROW boundary or adjacent to an approved ROW boundary.

**Designated Corridors** – The installation of new rights-of-way within the existing corridor or adjacent to the existing corridor.

**AD-6:** Incorporate RDFs as described in Appendix B in the development of project or proposal implementation, reauthorizations or new authorizations and suppression activities, as conditions of approval (COAs) into any post-lease activities and as best management practices for locatable minerals activities, to the extent allowable by law, unless at least one of the following conditions can be demonstrated and documented in the NEPA analysis associated with the specific project:

- a. A specific RDF is not applicable to the site-specific conditions of the project or activity;
- b. A proposed design feature or BMP is determined to provide equal or better protection for GRSG or its habitat; or
- c. Analysis concludes that following a specific RDF would provide no more protection to GRSG or its habitat than not following it, for the project being proposed.

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where it best limits impacts to greater sage-grouse or their habitats. If co-location of new infrastructure cannot be accomplished, locate it adjacent to existing infrastructure, roads, or already disturbed areas.

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**GRSG-LR-SUA-ST-013-Standard** – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized.

**GRSG-LR-SUA-ST-014-Standard** – In GHMA, new lands special use authorizations may be issued for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers, if they can be located within existing designated corridors or ROWs and the authorization includes stipulations to protect GRSG and their habitats. Existing authorized uses will continue to be recognized.

**GRSG-LR-SUA-ST-016-Standard** – In PHMA, IHMA, GHMA and SFAs, require protective stipulations (e.g., noise, tall structure, guy wire removal, perch deterrent installation) when issuing new authorizations or during renewal, amendment, or reissuance of existing

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	<p>authorizations that authorize infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers).</p> <p><b>GRSG-LR-SUA-GL-021-Guideline</b> – In PHMA and SFA, outside of existing designated corridors and ROWs, new transmission lines and pipelines should be buried to limit disturbance to the smallest footprint unless explicit rationale is provided that the biological impacts to GRSG and its habitat are being avoided. When new transmission lines and pipelines are not buried, locate them adjacent to existing transmission lines and pipelines.</p>
<p><b>AD-7:</b> Conduct implementation and project activities, including construction and short-term anthropogenic disturbances consistent with seasonal habitat restrictions described in Appendix C.</p>	<p><b>GRSG-LR-SUA-ST-015-Standard</b> – In PHMA, IHMA and SFAs, do not authorize temporary lands special uses (i.e., facilities or activities) that result in loss of habitat or would have long-term (i.e., greater than 5 years) negative impact on GRSG or their habitats.</p> <p><b>GRSG-GEN-GL-006-Standard</b> – During lekking (March 1 to April 30) restrict surface disturbing and disruptive activities, including noise at 10dB above ambient (not to exceed 20-24 dB) measured at the perimeter of an occupied lek, to lekking birds from 6 pm to 9 am within a buffer distance of 3.1 miles.</p> <p><b>GRSG-GEN-GL-007-Guideline</b> – During breeding and nesting (March 1 to June 15), surface disturbing and disruptive activities to nesting birds should be avoided.</p> <p><b>GRSG-RT-ST-070-Standard</b> – Do not conduct or allow road and trail maintenance activities within 2 miles from the perimeter of active leks during lekking (March 1 to April 30) from 6 pm to 9 am.</p>
<p><b>AD-8:</b> RDFs and seasonal habitat restrictions would not be required for emergency or short-term activities necessary to protect and preserve human life or property.</p>	<p>No similar management direction.</p>
<p><b>AD-9:</b> In undertaking BLM management actions, and consistent with valid and existing rights and applicable law in authorizing third-party actions, the BLM will apply the lek buffer-distances identified in the USGS Report Conservation Buffer Distance Estimates for Greater</p>	<p>Plan buffer distances, reflecting lower-interpreted range from Manier, D.J., Bowen, Z.H., Brooks, M.L., Casazza, M.L., Coates, P.S., Deibert, P.A., Hanser, S.E., and Johnson, D.H., 2014, Conservation buffer distance estimates for Greater Sage-Grouse—A review: U.S.</p>

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Sage-Grouse – A Review (Open File Report 2014-1239) in accordance with Appendix B.	Geological Survey Open-File Report 2014–1239, 14 p., <a href="http://dx.doi.org/10.3133/ofr20141239">http://dx.doi.org/10.3133/ofr20141239</a> , are included as Guidelines.
<b>AD-10:</b> Incorporate appropriate conservation measures for slickspot peppergrass ( <i>Lepidium papilliferum</i> ) as described in the 2014 Conservation Agreement (as updated, amended or reauthorized) into implementation and project design within slickspot peppergrass habitat in the Jarbidge and Four Rivers Field Offices to avoid and minimize impacts to slickspot peppergrass. The 2014 Conservation Agreement is included as Appendix P.	No similar management direction.
<b>MIT-1 (Mitigation):</b> BLM would establish an inter-agency State GRSG Conservation Team at the state level (both Idaho and Montana) to help guide conservation of GRSG through compensatory mitigation, within 90 days of the issuance of the Record of Decision.	No similar management direction.
<b>MIT-3:</b> In all GRSG habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation (Appendix G, Table G-1), the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.	<b>GRSG-GEN-ST-005-Standard</b> - In PHMA, SFA, and IHMA, only allow new authorized land uses if the residual impacts to GRSG or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix J).
<b>MIT-4:</b> Mitigate anthropogenic development (Appendix G, Table G-1) impacts to GRSG habitat through application of appropriate mitigation in accordance with the Mitigation Framework (Appendix J).	<b>GRSG-GEN-ST-005-Standard</b> - In PHMA, SFA, and IHMA, only allow new authorized land uses if the residual impacts to GRSG or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix J).

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<p><b>MIT-5:</b> Consistent with regulations for minerals activities, require a full reclamation bond specific to the site when surface disturbing activities are proposed. Ensure reclamation bonds are sufficient to cover costs to fully rehabilitate lost GRSG habitat. Base the reclamation costs on the assumption that contractors for the BLM will perform the work. Areas are considered fully rehabilitated when they meet the conditions described in Table 2-3.</p>	<p>Standard operating procedure.</p>
<p><b>MON-1 (Monitoring):</b> Once FIAT Assessments are complete, annually complete a review of FIAT Assessment implementation efforts within GRSG habitat with appropriate USFWS and state agency personnel.</p>	<p>Direction will be included in the Implementation Guide.</p>
<p><b>MON-2:</b> Monitor the effectiveness of projects (e.g., fuel breaks, fuels treatments) until objectives have been met or until it is determined that objectives cannot be met, according to the monitoring schedule identified for project implementation.</p>	<p>Standard operating procedure and will be included in the Implementation Guide.</p>
<p><b>MON-3:</b> Monitor invasive vegetation post vegetation management treatment</p>	<p><b>GRSG-GRSGH-GL-031-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, actions and authorizations should include design features to limit the spread and effect of non-native undesirable plant species.</p> <p><b>GRSG-RT-GL-076-Guideline</b> - In PHMA, IHMA, GHMA and SFAs, road and road-way maintenance activities should be designed and implemented to reduce the risk of vehicle or human-caused wildfires and the spread of invasive plants. Such activities include but are not limited to the removal or mowing of vegetation a car-width off the edge of roads; use of weed-free earth-moving equipment, gravel, fill, or other materials; and blading or pulling roadsides and ditches that are infested with noxious weeds only if required for public safety or protection of the roadway.</p>
<p><b>MON-4:</b> Monitor project construction areas for noxious weed and invasive species for at least 3 years, unless control is achieved earlier.</p>	<p><b>GRSG-GRSGH-GL-031-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, actions and authorizations should include design features to limit the spread and effect of non-native undesirable plant species.</p> <p><b>GRSG-RT-GL-076-Guideline</b> - In PHMA, IHMA, GHMA and SFAs, road and road-way maintenance activities should be designed and implemented to reduce the risk of vehicle or human-caused wildfires</p>

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	and the spread of invasive plants. Such activities include but are not limited to the removal or mowing of vegetation a car-width off the edge of roads; use of weed-free earth-moving equipment, gravel, fill, or other materials; and blading or pulling roadsides and ditches that are infested with noxious weeds only if required for public safety or protection of the roadway.
<b>MON-5:</b> Use lek, nesting and winter habitat maps and key habitat map (updates) to annually assess GRSG population and habitat status in the context of the adaptive management triggers.	No similar habitat.
<b>MON-6:</b> Continue to support updates to the Key Habitat map to track vegetation changes in relation to GRSG habitat on a yearly basis, until such a time this process is replaced. The process used to update the Key Habitat Map is described in Appendix F.	Direction will be included in the Implementation Guide.
<b>MON-7:</b> Monitor GRSG habitat as described in the monitoring framework plan (Appendix E) in coordination with IDFG and MT FWP.	Is included in the Monitoring Appendix.
<b>VEG-OBJ-1 (Vegetation):</b> Reconnect and expand areas of higher native plant community integrity/rangeland health to increase the extent of high quality habitat and, where possible, to accommodate the future effects of climate change.	<b>GRSG-GEN-DC-001-Desired Condition</b> – The landscape for greater sage-grouse encompasses large contiguous areas of native vegetation, approximately 6 to 62 square miles in area, to provide for multiple aspects of species life requirements. Within these landscapes, a variety of sagebrush-community compositions exist without invasive species, which have variations in subspecies composition, co-dominant vegetation, shrub cover, herbaceous cover, and stand structure, to meet seasonal requirements for food, cover, and nesting for greater sage-grouse.
<b>VEG-OBJ-2:</b> Increase the amount and functionality of seasonal habitats by: <ul style="list-style-type: none"> <li>a. Increasing or enhancing canopy cover and average patch size of sagebrush.</li> <li>b. Increasing the amount, condition and connectivity of seasonal habitats.</li> <li>c. Protecting or improving GRSG migration/movement corridors.</li> <li>d. Reducing conifer encroachment within GRSG seasonal habitats.</li> <li>e. Improving understory (grass, forb) and/or riparian condition within</li> </ul>	<b>GRSG-GRSGH-O-027-Objective</b> – Every 10 years for the next 50 years, improve GRSG habitat by removing invading conifers and other undesirable species based upon the number of acres shown in Table 2-7.

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<p>breeding and late brood-rearing habitats.</p> <p>f. Reducing the extent of annual grasslands within and adjacent to PHMA and IHMA.</p> <p>Decadal treatment objectives by population area are identified in Table 2-5.</p>	
<p><b>VEG-OBJ-3:</b> In all SFAs and PHMAs, the desired condition is to maintain a minimum of 70 percent of lands capable of producing sagebrush with 10 to 30 percent sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).</p>	<p><b>GRSG-GEN-DC-003-Desired Condition</b> – In all GRSG seasonal habitats, including all seasonal habitats, 70 percent of lands capable of producing sagebrush have 10 to 30 percent sagebrush canopy cover and less than 10 percent conifer canopy cover. In addition, within breeding and nesting habitat, sufficient herbaceous vegetation structure and height provides overhead and lateral concealment for nesting and early brood rearing life stages. Within brood rearing habitat, wet meadows and riparian areas sustain a rich diversity of perennial forb species relative to site potential. Within winter habitat, sufficient sagebrush height and density provides food and cover for GRSG during this seasonal period. Specific desired conditions for GRSG based on seasonal habitat requirements are in Table 2-6.</p> <p><b>GRSG-GRSGH-O-027-Objective</b> – Every 10 years for the next 50 years, improve GRSG habitat by removing invading conifers and other undesirable species based upon the number of acres shown in Table 2-7.</p>
<p><b>VEG-I:</b> Implement habitat rehabilitation or restoration projects in areas that have potential to improve GRSG habitat using a full array of treatment activities as appropriate, including chemical, mechanical and seeding treatments.</p>	<p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i></p> <p><b>GRSG-GRSGH-GL-034-Guideline</b> – In PHMA, IHMA and SFAs, vegetation treatment projects should only be conducted if they restore, enhance, or maintain desired conditions (Table 2-6).</p>



BLM Management Actions	Forest Service Plan Components
<p><b>VEG-2:</b> Implement vegetation rehabilitation or manipulation projects to enhance sagebrush cover or to promote diverse and healthy grass and forb understory to achieve the greatest improvement in GRSG habitat based on FIAT Assessments, HAF assessments, other vegetative assessment data and local, site specific factors that indicate sagebrush canopy cover or herbaceous conditions do not meet habitat management objectives (i.e. is minimal or exceeds optimal characteristics). This may necessitate the use of prescribed fire as a site preparation technique to remove annual grass residual growth prior to the use of herbicides in the restoration of certain lower elevation sites (e.g., Wyoming big sagebrush) but such efforts will be carefully planned and coordinated to minimize impacts to GRSG seasonal habitats.</p>	<p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i></p> <p><b>GRSG-GRSGH-GL-034-Guideline</b> – In PHMA, IHMA and SFAs, vegetation treatment projects should only be conducted if they restore, enhance, or maintain desired conditions (Table 2-6).</p>
<p><b>VEG-3:</b> Require use of native seeds for restoration based on availability, adaptation (ecological site potential), and probability of success (Richards et al. 1998). Non-native seeds may be used as long as they support GRSG habitat objectives (Pyke 2011) to increase probability of success, when adapted seed availability is low or to compete with invasive species especially on harsher sites.</p>	<p><b>GRSG-GRSGH-GL-033-Guideline</b> - In PHMA, IHMA, GHMA and SFAs, native plant species should be used, when possible, to restore, enhance, or maintain desired conditions (Table 2-6).</p>
<p><b>VEG-4:</b> Implement management changes in restoration and rehabilitation areas, as necessary, to maintain suitable GRSG habitat, improve unsuitable GRSG habitat and to ensure long-term persistence of improved GRSG habitat (Eiswerth and Shonkwiler 2006). Management changes could be considered during livestock grazing permit renewals, travel management planning, and renewal or reauthorization of ROWs.</p>	<p><b>GRSG-GRSGH-GL-034-Guideline</b> – In PHMA, IHMA and SFAs, vegetation treatment projects should only be conducted if they restore, enhance, or maintain desired conditions (Table 2-6).</p>
<p><b>VEG-5:</b> Consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) to provide a reliable source of locally adapted seed to use during rehabilitation and restoration activities.</p>	<p>No similar management direction.</p>
<p><b>VEG-6:</b> Allocate use of native seed to GRSG or ESA listed species habitat in years when preferred native seed is in short supply. This may require reallocation of native seed from ESR (BLM) and/or BAER (Forest Service) projects outside of PHMA or IHMA to those inside it.</p>	<p>Direction will be included in the Implementation Guide.</p>

BLM Management Actions	Forest Service Plan Components
<p>Where probability of success or native seed availability is low, nonnative seeds may be used as long as they meet GRSG habitat conservation objectives (Pyke 2011). Re-establishment of appropriate sagebrush species/subspecies and important understory plants, relative to site potential, shall be the highest priority for rehabilitation efforts.</p>	
<p><b>VEG-7:</b> During land health assessments, evaluate the relative value of existing nonnative seeding within GRSG habitat as: 1) a component of a grazing system allowing improvement of adjacent native vegetation, 2) development of a forage reserve, 3) incorporation into a fuel break system (Davies et al. 2011) or 4) restoration/diversification for GRSG habitat improvement. Where appropriate and feasible, diversify seedings, or restore to native vegetation when potential benefits to GRSG habitat outweigh the other potential uses of the non-native seeding, with emphasis on PHMA and IHMA. Allow recolonization of seedings by sagebrush and other native vegetation.</p>	<p>Forest Service does not complete land health assessments.</p> <p><b>GRSG-GRSGH-GL-031-Guideline</b> – In priority, important, and general habitat management areas and sagebrush focal areas, actions and authorizations should include design features to limit the spread and effect of undesirable non-native plant species.</p> <p><b>GRSG-GRSGH-GL-033-Guideline</b> - In priority, important, and general habitat management areas and sagebrush focal areas, native plant species should be used, when possible, to restore, enhance, or maintain desired conditions (table 1).</p> <p><b>GRSG-LG-GL-038-Guideline</b> – In priority, important, and general habitat management areas and sagebrush focal areas, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (table 1).</p>
<p><b>VEG-8:</b> Remove conifers encroaching into sagebrush habitats. Prioritize treatments closest to occupied GRSG habitats and near occupied leks, and where juniper encroachment is phase 1 or phase 2. Use of site-specific analysis and tools like VDDT and the FIAT report (Chambers et. al., 2014) will help refine the location for specific areas to be treated.</p>	<p><b>GRSG-GRSGH-GL-030-Guideline</b> – When removing conifers that are encroaching into GRSG habitat, avoid persistent woodlands (i.e., old growth relative to the site or more than 100 years old).</p> <p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i></p>
<p><b>INV-1 (Invasive Species):</b> Incorporate results of the FIAT Assessments into projects and activities addressing invasive species.</p>	<p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and</i></p>

BLM Management Actions	Forest Service Plan Components
	<i>resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i>
<b>INV-2:</b> Implement noxious weed and invasive species control using integrated vegetation management actions per national guidance and local weed management plans for Cooperative Weed Management Areas in cooperation with State and Federal agencies, affected counties, and adjoining private lands owners.	
<b>INV-3:</b> Conduct integrated weed management actions for noxious and invasive weed populations that are impacting or threatening GRSG habitat quality using a variety of eradication and control techniques including chemical, mechanical and other appropriate means.	Standard operating procedure (FSM 2080).
<b>INV-4:</b> Require project proponent (projects described in Table 2-4 and which are included in the anthropogenic disturbance cap evaluation) to ensure that noxious weeds and invasive species caused as a result of the project are treated to eliminate establishment on the disturbed project construction areas for at least 3 years and monitored and treated during the life of the project.	<b>GRSG-GRSGH-GL-031-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, actions and authorizations should include design features to limit the spread and effect of non-native undesirable plant species.
<b>FUEL-OBJ-1:</b> Design fuel treatments to restore, enhance, or maintain GRSG habitat.	<p><b>GRSG-FM-GL-047-Guideline</b> – In PHMA, IHMA, GHMA and SFA, when reseeding in fuel breaks, fire resistant native plant species should be used if available, or consider using fire resistant non-native species to meet resource objectives, if analysis demonstrates that non-native plants will not damage GRSG habitat in the long term.</p> <p><b>GRSG-FM-GL-048-Guideline</b> – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.</p>
<b>FUEL-OBJ-2:</b> Manage wildfires to minimize loss of sagebrush and protect GRSG habitat.	<b>GRSG-FM-DC-043-Desired Condition</b> – In PHMA, IHMA, GHMA and SFA, the extent and spread of wildfire resulting in loss of sagebrush is minimized, considering firefighter and public safety and other high priority values.
<b>WFP-1 (Wildfire Preparedness):</b> Support development and implementation of Rangeland Fire Protection Associations (RFPAs) in coordination with the State of Idaho.	Will likely be in the Record of Decision.

BLM Management Actions	Forest Service Plan Components
<p><b>WFP-2:</b> Develop a consistent approach to fire restrictions within GRSG habitat through the existing coordinated inter-agency approach to fire restrictions based upon National Fire Danger Rating System thresholds (fuel conditions, drought conditions, and predicted weather patterns).</p>	<p>Standard operating procedure.</p>
<p><b>WFP-3:</b> Annually incorporate into existing fire management plans results and updates from the Wildfire and Invasive Species Habitat Assessments (FIAT Assessments) described in Appendix D, to communicate/explain the resource value of GRSG habitat, including fire prevention messages and actions to reduce human-caused ignitions.</p>	<p>Standard operating procedure.</p>
<p><b>WFP-4:</b> Continue to participate with the Wildland Fire Leadership Council, a cooperative, interagency organization dedicated to achieving consistent implementation of the goals, actions, and policies in the National Fire Plan and the Federal Wildland Fire Management Policy.</p>	<p>Standard operating procedure.</p>
<p><b>WFP-5:</b> Continue annual coordination meetings held between cooperating agencies that have fire suppression responsibilities. Incorporate Rangeland Fire Protection Associations and other stakeholders into this coordination. Discuss priority suppression areas and distribute maps showing priority suppression areas at both the Conservation Area and the local office levels as based on the adaptive management strategy and FIAT Assessments.</p>	<p><b>GRSG-FM-GL-056-Guideline</b> – Localized maps of PHMA, IHMA, GHMA and SFA should be provided to dispatch officers and extended attack incident commanders to use when prioritizing wildfire suppression resources and designing suppression tactics.</p> <p><b>GRSG-FM-GL-055-Guideline</b> - Unit-specific GRSG fire management toolboxes containing maps, lists, contact information for qualified resource advisors, local guidance, and relevant information should be developed and used.</p>
<p><b>WFP-6:</b> Ensure firefighter personnel receive annual orientation regarding GRSG habitat and sagebrush management issues as related to wildfire suppression.</p>	<p><b>GRSG-FM-GL-055-Guideline</b> - Unit-specific GRSG fire management toolboxes containing maps, lists, contact information for qualified resource advisors, local guidance, and relevant information should be developed and used.</p>
<p><b>WFP-7:</b> As part of the FIAT Assessments, identify roads, trails, and recreational use areas with high frequency of human caused fires within or adjacent to the PHMA or IHMA. Consider these areas during annual fire restriction evaluations, and as appropriate, through site specific management.</p>	<p><b>GRSG-FM-GL-053-Guideline</b> - In PHMA, IHMA, GHMA and SFA, roads and natural fuel breaks should be incorporated into fuel break design to improve effectiveness and minimize loss of existing sagebrush habitat.</p>
<p><b>WFP-8:</b> Coordinate with Federal, State and local jurisdictions on fire and litter prevention programs to reduce human caused ignitions.</p>	<p>Standard operating procedure.</p>

BLM Management Actions	Forest Service Plan Components
<p><b>WFP-9:</b> Implement activities identified within the FIAT Assessments</p>	<p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i></p>
<p><b>WFS-1:</b> Complete Wildland Fire and Invasive Species Assessments (FIAT Assessments) as described within Appendix D and incorporate results into appropriate Fire Management Plans as they are completed. FIAT Assessments are interdisciplinary evaluations of the threats posed by wildfire and invasive species, as well as identification of focal and emphasis habitats/treatment opportunities for fuels management, fire management, and restoration. These FIAT Assessments identify focal and emphasis habitats and describe strategies for fuels management, suppression and restoration activities. Focal and Emphasis Habitats identified through the FIAT Assessment to further refine priority areas for treatments to reduce the threats posed by wildfire, invasive annual grass and conifer expansion.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>WFS-2:</b> As part of the FIAT Assessments incorporate a wildfire response time analysis focusing on response time to identified priority areas within PHMA and IHMA or on those fires that have the potential to impact PHMA and IHMA. Incorporate findings into Unit Initial Attack program that determines initial attack resources.</p>	<p>No similar management direction.</p>
<p><b>WFS-3:</b> As part of the FIAT Assessment incorporate a water capacity analysis for suppression purposes, including potential private water sources. Utilized the analysis to ensure water availability for response to fire in or threatening PHMA and IHMA during initial attack.</p>	<p>Standard operating procedure and no similar management direction.</p>
<p><b>WFS-4:</b> During high fire danger conditions, stage initial attack and secure additional resources closer to priority areas identified in the FIAT Assessments, based on anticipated fires and weather conditions, with particular consideration of the West Owyhee, Southern and Desert Conservation Areas to ensure quicker response times in or near GRSG habitat after considerations and placement of resources to protect human life and property.</p>	<p><b>GRSG-FM-GL-058-Guideline</b> – On critical fire weather days, protection of GRSG habitat should receive high consideration, along with other high values, when positioning resources</p>

BLM Management Actions	Forest Service Plan Components
<p><b>WFS-5:</b> Utilize a full range of fire management strategies and tactics through strategic wildfire suppression planning consistent with appropriate management response and within acceptable risk levels, to achieve resource objectives for GRSG habitat consistent with land use plan direction. Utilizing both direct and indirect attack as appropriate to limit the overall amount of GRSG habitat burned. This could include suppressing fires in intact sagebrush habitats; limiting fire growth in GHMA when suppression resources are available or managing wildfire for resource benefit in areas of conifer (juniper) encroachment.</p>	<p><b>GRSG-FM-GL-051-Guideline</b> – In PHMA, IHMA, GHMA and SFA, use fire management tactics and strategies that seek to minimize loss of existing sagebrush habitat. The safest and most practical means to do so will be determined by fireline leadership and incident commanders.</p> <p><b>GRSG-FM-GL-060-Guideline</b> – In PHMA, IHMA, GHMA and SFA, consider using fire retardant and mechanized equipment only if it is likely to result in minimizing burned acreage</p> <p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>WFS-6:</b> Suppression priorities: Firefighter and public safety followed by property are the highest priority for protection during suppression activities. Maintaining GRSG habitat will be the highest natural resources priority immediately after human life and property, commensurate with threatened and endangered species habitat or other critical habitats to be protected.</p>	<p><b>GRSG-FM-DC-043-Desired Condition</b> – In PHMA, IHMA, GHMA and SFA, the extent and spread of wildfire resulting in loss of sagebrush is minimized, considering firefighter and public safety and other high priority values</p>
<p><b>WFS-7:</b> Ensure close coordination with federal and state firefighters including the Rangeland Fire Protection Associations during suppression activities.</p>	<p>Standard operating procedure.</p>
<p><b>FM-I:</b> Design and implement fuels treatments that would reduce the potential start and spread of unwanted wildfires and provide anchor points or control lines for the containment of wildfires during suppression activities with an emphasis on maintaining, protecting, and expanding sagebrush ecosystems and successfully rehabilitated areas and strategically and effectively reduce wildfire threats in the greatest area.</p>	<p><b>GRSG-FM-GL-048-Guideline</b> – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.</p> <p><b>GRSG-FM-GL-053-Guideline</b> - In PHMA, IHMA, GHMA and SFA, roads and natural fuel breaks should be incorporated into fuel break design to improve effectiveness and minimize loss of existing sagebrush habitat.</p>

BLM Management Actions	Forest Service Plan Components
<p><b>FM-2:</b> Enhance (or maintain/retain) sagebrush canopy cover and community structure to match expected potential for the ecological site and consistent with GRSG habitat objectives unless fuels management objectives requires additional reduction in sagebrush cover to meet strategic protection of GRSG habitat. Closely evaluate the benefits of the fuel management treatments against the additional loss of sagebrush cover on the local landscape in the NEPA process.</p>	<p><b>GRSG-FM-GL-048-Guideline</b> – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.</p> <p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>FM-3:</b> Apply appropriate seasonal restrictions for implementing vegetation and fuels management treatments according to the type of seasonal habitats present. Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around and/or in the winter range and would protect, maintain, increase, or enhance winter range habitat quality. Ensure chemical applications are utilized where they would assist in success of fuels treatments. Strategically place treatments on a landscape scale to prevent fire from spreading into PHMA or WVUI.</p>	<p><b>GRSG-FM-GL-046-Guideline</b> – In wintering or breeding and nesting habitat, sagebrush removal or manipulation, including prescribed fire, should be restricted unless the removal strategically reduces the potential impacts from wildfire.</p> <p><b>GRSG-GEN-GL-007-Guideline</b> – During breeding and nesting (March 1 to June 15), surface disturbing and disruptive activities to nesting birds should be avoided.</p>
<p><b>FM-4:</b> Develop a fuels continuity and management strategy to expand, enhance, maintain and protect GRSG habitat informed by the FIAT Assessments completed as described in Appendix D.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>FM-5:</b> When developing the fuels management strategy as part of the FIAT Assessment described in Appendix D consider up-to-date fuels profiles; land use plan direction; current and potential habitat fragmentation; sagebrush and GRSG ecological factors; active vegetation management steps to provide critical breaks in fuel continuity where appropriate; incorporate a comparative risk analysis with regard to the risk of increased habitat fragmentation from a</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>

BLM Management Actions	Forest Service Plan Components
<p>proposed action versus the risk of large scale fragmentation posed by wildfires if the action is not taken.</p>	
<p><b>FM-6:</b> Fuel treatments will be designed through an interdisciplinary process to expand, enhance, maintain, and protect GRSG habitat which considers a full range of cost effective fuel reduction techniques, including: chemical, biological (including grazing and targeted grazing), mechanical and prescribed fire treatments.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>FM-7:</b> Existing and proposed linear ROWs could be considered for use and maintenance as vegetated fuel breaks in appropriate areas (this activity may or may not be part of the ROW permit or the responsibility of the permit holder, in cases where this activity is considered part of mitigation for project design then it would be appropriately included as part of the ROW permit and the responsibility of the permit holder for development and maintenance).</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p> <p><b>GRSG-FM-GL-053-Guideline</b> - In PHMA, IHMA, GHMA and SFA, roads and natural fuel breaks should be incorporated into fuel break design to improve effectiveness and minimize loss of existing sagebrush habitat</p>
<p><b>FM-8:</b> Fuel breaks would incorporate existing vegetation treatments (seedings), rocky areas or other appropriate topography or features or be located adjacent to existing linear disturbance areas where appropriate. Fuel breaks should be placed in areas with the greatest likelihood of compartmentalizing a fire and/or to foster suppression options to protect existing intact habitat.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p> <p><b>GRSG-FM-GL-053-Guideline</b> - In PHMA, IHMA, GHMA and SFA, roads and natural fuel breaks should be incorporated into fuel break design to improve effectiveness and minimize loss of existing sagebrush habitat</p>



BLM Management Actions	Forest Service Plan Components
<p><b>FM-9:</b> Strategically pre-treat areas to reduce fine fuels consistent with areas and results identified within the Wildfire and Invasive Species Assessments.</p>	<p>No similar management direction.</p>
<p><b>FM-10:</b> Protect vegetation restoration and rehabilitation efforts/projects from subsequent fire events.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p> <p><b>GRSG-FM-GL-048-Guideline</b> – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.</p>
<p><b>FM-11:</b> Targeted grazing as a fuels treatment to adjust the vegetation conditions to reduce the potential start and spread of wildfires may be implemented within existing grazing authorizations if feasible such as through temporary non-renewable authorizations, or through contracts, agreements or other appropriate means separate from existing grazing authorizations and permits.</p>	<p><b>GRSG-GRSGH-GL-032-Guideline</b> - To facilitate safe and effective fire management actions, in PHMA, IHMA, and GHMA and SFAs, fuels treatments in high-risk areas (i.e., areas likely to experience wildfire at an intensity level that might result in movement away from the GRSG desired conditions in Table 2-6) should be designed to reduce the spread and/or intensity of wildfire or the susceptibility of GRSG values to move away from desired conditions (Table 2-6).</p>
<p><b>FM-12:</b> Targeted grazing to achieve fuels management objectives should conform to the following criteria:</p> <ol style="list-style-type: none"> <li>a. Targeted grazing should be implemented strategically on the landscape, and directly involve the minimum footprint and grazing intensity required to meet fuels management objectives.</li> <li>b. Conform to the applicable Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho or Montana) at the assessment scale (pasture/watershed).</li> <li>c. Where feasible and applicable coordinate with the grazing permittee to strategically reduce fuels through livestock management within the Mandatory Terms and Conditions of the applicable grazing authorizations</li> </ol>	<p>No similar management direction.</p>

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**BLM Management Actions**

**FM-13:** Prioritize the use of native seeds for fuels management treatment based on availability, adaptation (site potential), and probability of success. Where probability of success or native seed availability is low or non-economical, nonnative seeds may be used to meet GRSG habitat objectives to trend toward restoring the fire regime. When reseeding, use fire resistant native and nonnative species, as appropriate, to provide for fuel breaks.

**FM-15:** If prescribed fire is used in GRSG habitat, the NEPA analysis for the Burn Plan will address:

why alternative techniques were not selected as a viable options;

how GRSG goals and objectives would be met by its use;

how the COT Report objectives would be addressed and met;

a risk assessment to address how potential threats to GRSG habitat would be minimized.

- a. Allow prescribed fire as a vegetation or fuels treatment in Wyoming big sagebrush sites or other xeric sagebrush species sites, or in areas with a potential for post-fire exotic annual dominance only after the NEPA analysis for the Burn Plan has addressed the four bullets outlined above. Prescribed fire could be used to meet specific fuels objectives that would protect Greater Sage-Grouse habitat in PHMAs (e.g., creation of fuel breaks that would disrupt the fuel continuity across the landscape in stands where annual invasive grasses are a minor component in the understory, burning slash piles from conifer reduction treatments, used as a component with other treatment methods to combat annual grasses and restore native plant communities).
- b. Allow prescribed fire in known winter range only after the NEPA

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**Forest Service Plan Components**

**GRSG-GRSGH-GL-033-Guideline** - In PHMA, IHMA, GHMA and SFAs, native plant species should be used, when possible, to restore, enhance, or maintain desired conditions (Table 2-6).

**GRSG-FM-GL-047-Guideline** – In PHMA, IHMA, GHMA and SFA, when reseeding in fuel breaks, fire resistant native plant species should be used if available, or consider using fire resistant non-native species to meet resource objectives, if analysis demonstrates that non-native plants will not damage GRSG habitat in the long term.

**GRSG-FM-GL-048-Guideline** – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.

**GRSG-FM-ST-044-Standard** – In PHMA, IHMA, GHMA and SFA, do not use prescribed fire, except for pile burning, in 12-inch or less precipitation zones unless necessary to facilitate site preparation for restoration of GRSG habitat consistent with desired conditions in Table 2-6.

**GRSG-FM-ST-045-Standard** – In PHMA, SFA, GHMA, if it is necessary to use prescribed fire to facilitate site preparation for restoration of greater sage-grouse habitat consistent with desired conditions in Table 2-6, the associated NEPA analysis must identify how the project would move towards GRSG desired conditions, why alternative techniques were not selected, and how potential threats to GRSG habitat would be minimized.

**GRSG-FM-GL-046-Guideline** – In wintering or breeding and nesting habitat, sagebrush removal or manipulation, including prescribed fire, should be restricted unless the removal strategically reduces the potential impacts from wildfire

**GRSG-FM-GL-048-Guideline** – In PHMA, IHMA, GHMA and SFA, fuel treatments should be designed to restore, enhance, or maintain GRSG habitat.

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BLM Management Actions	Forest Service Plan Components
<p>analysis for the Burn Plan has addressed the four bullets outlined above. Any prescribed fire in winter habitat would need to be designed to strategically reduce wildfire risk around and/or in the winter range and designed to protect winter range habitat quality.</p>	
<p><b>ESR-1:</b> Utilize the findings and Restoration/Rehabilitation Strategy developed as part of the FIAT Assessment process described in Appendix D to determine if GRSG rehabilitation actions are needed, based on ecological potential, and direct emergency stabilization and rehabilitation (ESR) (BLM) or Burned Area Emergency Response (BAER) (Forest Service) actions after fire.</p>	<p><b>GRSG-GRSGH-ST-028-Standard</b> – Design habitat restoration projects to move towards desired conditions (Table 2-6) and incorporate the concepts outlined in Appendix D - <i>Using resistance and resilience concepts to reduce impacts of invasive annual grasses and altered fire regimes on the sagebrush ecosystem and greater sage-grouse: A strategic multi-scale approach.</i></p>
<p><b>ESR-3:</b> Provide adequate rest from livestock grazing to allow natural recovery of existing vegetation and successful establishment of seeded species within burned/ESR areas. All new seedings of grasses and forbs should not be grazed until at least the end of the second growing season, and longer as needed to allow plants to mature and develop robust root systems which will stabilize the site, compete effectively against cheatgrass and other invasive annuals, and remain sustainable under long-term grazing management. Adjust other management activities, as appropriate, to meet ESR objectives.</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p>
<p><b>ESR-4:</b> Adjust, as appropriate, livestock management on adjacent unburned areas to mitigate the effect of the burn on local GRSG populations.</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p>
<p><b>ESR-5:</b> Following seedling establishment, modify grazing management practices if needed to achieve long-term vegetation and habitat objectives.</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p>

BLM Management Actions	Forest Service Plan Components
<p><b>RM-1 (Range Management):</b> Maintain existing areas designated as available or unavailable for livestock grazing. Existing active AUMs for livestock grazing within the planning area would not be changed at the broad scale, though the number of AUMs available on an allotment may be adjusted based on site-specific conditions to meet management objectives during term permit renewals, AMP development, or other appropriate implementation planning. Additionally, temporary adjustments can be made annually to livestock numbers, the number of AUMs, and season of use in accordance with applicable regulations.</p>	<p>Direction will be included in the Implementation Guide.</p>
<p><b>RM-2:</b> Prioritize BLM land health assessments and processing of BLM grazing permits consistent with management area prioritization (MA-3), unless other higher priority considerations exist (RM-16) or other factors such as threatened, endangered and proposed species habitat that livestock grazing could affect. Where possible, conduct land health assessments at the watershed, or other meaningful landscape-scale.</p>	<p>Forest Service does not complete land health assessments. Direction will be included in the Record of Decision.</p>
<p><b>RM-3:</b> Where opportunities exist, coordinate with other land managers to encourage livestock operations that utilize mixed federal, private and/or state land to be managed at the landscape scale to benefit GRSG and their habitat across land ownerships.</p>	<p>Standard operating procedure.</p>
<p><b>RM-4:</b> PHMA &amp; IHMA: During the land health assessment process, identify the type(s) of seasonal habitat the assessed areas are capable of supporting. Utilize the habitat assessment framework, (Stiver et al. 2014 as amended/replaced) or other BLM or Forest Service approved methodology, in accordance with current policy and guidance to determine whether vegetation structure, condition and composition are meeting GRSG habitat objectives including riparian and lentic areas (HM-OBJ-2; Table 2-3). Use appropriate Ecological Site Descriptions, reference sheets and state and transition models to inform desired habitat conditions and expected responses to management changes for the land unit being assessed.</p>	<p>Forest Service does not complete land health assessments. Direction will be in the Implementation Guide.</p>
<p><b>RM-5:</b> When modifying grazing management, analyze indirect effects to habitat, including changes in fuel loading and wildfire behavior.</p>	<p>Standard operating procedure.</p>
<p><b>RM-6:</b> When livestock management practices are determined to not be compatible with meeting or making progress towards achievable</p>	<p><b>GRSG-LG-GL-038-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, consider closure of grazing allotments, pastures, or portions of</p>

BLM Management Actions	Forest Service Plan Components
<p>habitat objectives following appropriate consultation, cooperating and coordination, implement changes in grazing management through grazing authorization modifications, or allotment management plan implementation. Potential modifications include, but are not limited to, changes in:</p> <ol style="list-style-type: none"> <li>1) Season or timing of use;</li> <li>2) Numbers of livestock;</li> <li>3) Distribution of livestock use;</li> <li>4) Duration and/or level of use;</li> <li>5) Kind of livestock (e.g., cattle, sheep, horses, or goats) (Briske et al. 2011); and</li> <li>6) Grazing schedules (including rest or deferment).</li> </ol>	<p>pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-6).</p>
<p><b>RM-7:</b> Where opportunities exist, establish forage reserves to facilitate restoration and rehabilitation efforts in GRSG habitat areas. A forage reserve is an area that is set aside for use as needed by various permittees who might be displaced by wildfire, ESR, restoration efforts, etc. rather than having a term permit issued for grazing like a regular allotment.</p>	<p><b>GRSG-LG-GL-038-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-6).</p>
<p><b>RM-9:</b> PHMA &amp; IHMA - Where practical, design pasture rotations to utilize non-native perennial grass seedings and/or annual grasslands, during GRSG nesting season annually or periodically.</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p> <p><b>GRSG-LG-GL-038-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-6).</p>
<p><b>RM-10:</b> Evaluate the locations where salt/supplements are placed, coordinate salt/supplements placement to reduce impacts to GRSG habitat (e.g., existing disturbed areas).</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p>

BLM Management Actions	Forest Service Plan Components
<p><b>RM-11:</b> Incorporate RDFs into Terms and Conditions for crossing permits to limit disturbance of occupied leks when trailing livestock across BLM- and Forest Service -administered lands in the spring. Work with permittees in locating over-nighting, watering and bedding locations to minimize impacts to seasonal habitats.</p>	<p><b>GRSG-LG-GL-039-Guideline</b> – Bedding sheep and placing camps within 1.2 miles from the perimeter of a lek during lekking (March 1 to April 30) should be restricted.</p> <p><b>GRSG-LG-GL-040-Guideline</b> – During the breeding and nesting season (March 1 to June 15), trailing livestock through breeding and nesting habitat should be minimized. Specific routes should be identified, existing trails should be used, and stopovers on active leks should be avoided.</p>
<p><b>RM-12:</b> Design any new structural range improvements, following appropriate cooperation, consultation and coordination, to minimize and/or mitigate effects to GRSG habitat. Any new structural range improvements should be placed along existing disturbance corridors or in unsuitable habitat, to the extent practical, and are subject to RDFs (Appendix B). Structural range improvement in this context, include, but are not limited to: fences, exclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments.</p>	<p><b>GRSG-LG-GL-041-Guideline</b> – Fences should not be constructed or reconstructed within 1.2 miles from the perimeter of occupied leks, unless the collision risk can be mitigated through design features or markings (e.g., mark, laydown fences, or other design features).</p> <p><b>GRSG-LG-GL-042-Guideline</b> – New permanent livestock facilities (e.g., windmills, water tanks, corrals) should not be constructed within 1.2 miles from the perimeter of occupied leks.</p> <p><b>GRSG-LG-ST-036-Standard</b> – In PHMA, IHMA and SFAs, do not approve construction of water developments unless beneficial to GRSG habitat.</p>
<p><b>RM-13:</b> During the land health assessment and grazing permit renewal process, evaluate existing livestock management range improvements with respect to their effect on GRSG habitat. Consider removal of projects that are not needed for effective livestock management, are no longer in working condition, and/or negatively affect GRSG habitat, with the exception of functional projects needed for management of habitat for other threatened, endangered or proposed species or other sensitive resources.</p>	<p>Forest Service does not complete land health assessments. Direction will be included in the Record of Decision.</p>
<p><b>RM-14:</b> Prioritize removal, modification or marking of fences or other structures in areas of high collision risk following appropriate cooperation, consultation and coordination to reduce the incidence of GRSG mortality due to fence strikes (Stevens et al. 2012).</p>	<p><b>GRSG-LG-GL-041-Guideline</b> – Fences should not be constructed or reconstructed within 1.2 miles from the perimeter of occupied leks, unless the collision risk can be mitigated through design features or markings (e.g., mark, laydown fences, or other design features).</p>

BLM Management Actions	Forest Service Plan Components
<p><b>RM-15:</b> In response to weather conditions (i.e. drought) adjust grazing management (i.e., delay turnout, adjust pasture rotations, adjust the amount and/or duration of grazing) as appropriate to provide for adequate food and cover for GRSG.</p>	<p><b>GRSG-LG-DC-035-Desired Condition</b> – In PHMA, IHMA and SFAs, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-6).</p> <p><b>GRSG-LG-GL-038-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-6).</p>
<p><b>RM-16:</b> The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations</p>	<p>Forest Service will be modifying grazing permits as a result of this decision. A transition period will be identified in the Record of Decision.</p>
<p><b>RM-17:</b> The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds, based on GRSG Habitat Objectives Table, Land Health Standards (43 CFR 4180.2) and ecological site potential, and one or more defined responses that will allow the authorizing officer to make adjustments to livestock grazing that have already been subjected to NEPA analysis.</p>	<p>Standard operating procedure.</p>
<p><b>RM-18:</b> Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.</p>	<p>Forest Service will be modifying grazing permits as a result of this decision. A transition period will be identified in the Record of Decision.</p>

BLM Management Actions	Forest Service Plan Components
<p><b>RM-19:</b> At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives, such as reserve common allotments or fire breaks.</p>	<p><b>GRSG-LG-GL-038-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-6).</p>
<p><b>WHB-1:</b> Manage herd management areas (HMAs) in GRSG habitat within established AML ranges to achieve and maintain GRSG habitat objectives (Table 2-3).</p>	<p><b>GRSG-HB-GL-062-Guideline</b> – In PHMA, IHMA, GHMA and SFA, wild horse and burro populations should be managed within established appropriate management levels to restore, enhance, or maintain GRSG desired habitat conditions (Table 2-6).</p>
<p><b>WHB- 2:</b> Complete rangeland health assessments for HMAs containing GRSG habitat using an interdisciplinary team of specialists (e.g. range, wildlife, and riparian). The priorities for conducting assessments are: 1) HMAs Containing SFA; 2) HMAs containing PHMA; 3) HMAs containing IHMA; 4) HMAs containing GHMA; 5) HMAs containing sagebrush habitat outside of PHMA, IHMA, and GHMA mapped habitat; 6) HMAs without GRSG Habitat.</p>	<p><b>GRSG-HB-GL-063-Guideline</b> – In PHMA, IHMA, GHMA and SFA, appropriate management levels should be adjusted if GRSG management standards are not met due to degradation that can be at least partially be attributed to wild horse or burro populations.</p>
<p><b>WHB-3:</b> Prioritize gathers and population growth suppression techniques in HMAs in GRSG habitat, unless removals are necessary in other areas to address higher priority environmental issues, including herd health impacts. Place higher priority on Herd Areas not allocated as HMAs and occupied by wild horses and burros in SFAs followed by PHMA.</p>	<p><b>GRSG-HB-GL-063-Guideline</b> – In PHMA, IHMA, GHMA and SFA, appropriate management levels should be adjusted if GRSG management standards are not met due to degradation that can be at least partially be attributed to wild horse or burro populations.</p>
<p><b>WHB-4:</b> In SFAs and PHMA outside of SFA, assess and adjust AMLs through the NEPA process within HMAs when wild horses or burros are identified as a significant causal factor in not meeting land health standards, even if current AML is not being exceeded.</p>	<p><b>GRSG-HB-GL-063-Guideline</b> – In PHMA, IHMA, GHMA and SFA, appropriate management levels should be adjusted if GRSG management standards are not met due to degradation that can be at least partially be attributed to wild horse or burro populations.</p>
<p><b>WHB-5:</b> In SFAs and PHMA outside of SFA, monitor the effects of wild horse and burro use in relation to GRSG seasonal habitat objectives on an annual basis to help determine future management actions.</p>	<p>Forest Service has no WH&amp;B populations in sage grouse habitat.</p>



BLM Management Actions	Forest Service Plan Components
<p><b>WHB-6:</b> Develop or amend herd management area plans (HMAPs) to incorporate GRSG habitat objectives and management considerations for all HMAs within GRSG habitat, with emphasis placed on SFAs and other PHMAs.</p>	<p>Forest Service has no WH&amp;B populations in sage grouse habitat.</p>
<p><b>WHB-7:</b> Consider removals or exclusion of wild horse and burros during or immediately following emergency situations (such as fire, floods, and drought) to facilitate meeting GRSG habitat objectives where HMAs overlap with GRSG habitat.</p>	<p><b>GRSG-HB-GL-063-Guideline</b> – In PHMA, IHMA, GHMA and SFA, appropriate management levels should be adjusted if GRSG management standards are not met due to degradation that can be at least partially be attributed to wild horse or burro populations.</p>
<p><b>WHB-8:</b> When conducting NEPA analysis for wild horse and burro management activities, water developments, or other rangeland improvements for wild horses, address the direct and indirect effects to GRSG populations and habitat. Implement any water developments or rangeland improvements using the criteria identified for domestic livestock.</p>	<p>Forest Service has no WH&amp;B populations in sage grouse habitat.</p>
<p><b>WHB-9:</b> Coordinate with professionals from other federal and state agencies, researchers at universities, and others to utilize and evaluate new management tools (e.g., population growth suppression, inventory techniques, and telemetry) for implementing the wild horse and burro program.</p>	<p>Forest Service has no WH&amp;B populations in sage grouse habitat.</p>
<p><b>LR-I (Lands and Realty):</b> PHMA: Designate and manage PHMA as ROW avoidance areas, consistent with AD-3 and subject to RDFs, buffers and seasonal timing restrictions (Appendices B and C). IHMA: Designate and manage IHMA as ROW avoidance areas, consistent with AD-4 and subject to RDFs, buffers and seasonal timing restrictions. GHMA (Idaho and Montana): Designate and manage GHMA as open with proposals subject to RDFs, buffers and seasonal timing restrictions.</p>	<p><b>GRSG-LR-SUA-ST-013-Standard</b> – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized.</p> <p><b>GRSG-LR-SUA-ST-014-Standard</b> – In GHMA, new lands special use authorizations may be issued for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers, if they can be located within existing designated corridors or ROWs and the authorization includes stipulations to protect GRSG and their habitats. Existing authorized</p>

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**BLM Management Actions****Forest Service Plan Components**

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uses will continue to be recognized.

**GRSG-LR-SUA-ST-016-Standard** – In PHMA, IHMA, GHMA and SFAs, require protective stipulations (e.g., noise, tall structure, guy wire removal, perch deterrent installation) when issuing new authorizations or during renewal, amendment, or reissuance of existing authorizations that authorize infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers).

**GRSG-LR-SUA-ST-017-Standard** – In PHMA, IHMA, GHMA and SFAs, locate upgrades to existing transmission lines within the existing designated corridors or ROWs unless an alternate route would benefit GRSG or their habitats

**GRSG-LR-SUA-ST-020-Standard** – In PHMA, IHMA, GHMA and SFA, co-locate new infrastructure (e.g., high-voltage transmission lines, major pipelines, roads, distribution lines, and cellular towers) with existing infrastructure to limit disturbance to the smallest footprint, or where it best limits impacts to greater sage-grouse or their habitats. If co-location of new infrastructure cannot be accomplished, locate it adjacent to existing infrastructure, roads, or already disturbed areas.

**GRSG-LR-SUA-GL-021-Guideline** – In PHMA and SFA, outside of existing designated corridors and ROWs, new transmission lines and pipelines should be buried to limit disturbance to the smallest footprint unless explicit rationale is provided that the biological impacts to GRSG and its habitat are being avoided. When new transmission lines and pipelines are not buried, locate them adjacent to existing transmission lines and pipelines.

**GRSG-GEN-GL-007-Guideline** – During breeding and nesting (March 1 to June 15), surface disturbing and disruptive activities to nesting birds should be avoided.

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**BLM Management Actions**

**LR-2:** PHMA: Designate and manage PHMA as exclusion areas for utility scale (20 MW) wind and solar testing and development, nuclear and hydropower energy development. IHMA: Designate and manage IHMA as avoidance areas for wind and solar testing and development, nuclear and hydropower development. GHMA (Idaho): Designate and manage GHMA as open for wind and solar testing and development and nuclear and hydropower development subject to RDFs, buffers and seasonal timing restrictions. GHMA (Montana): Designate and manage GHMA as avoidance for wind and solar testing and development and nuclear and hydropower development.

**LR-3:** PHMA: Development of commercial service airports and facilities (as defined by FAA 2014 – publically owned airports that have at least 2,500 passenger boardings each calendar year and receive scheduled passenger service) would not be allowed within PHMA. IHMA and GHMA are Avoidance and Open respectively for these types of ROW applications as described in LR-1.

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**GRSG-WS-ST-025-Standard** – In PHMA and SFA do not authorize new solar and wind utility-scale and/or commercial energy development except for on-site power generation associated with existing industrial infrastructure (e.g., mine site).

**GRSG-WS-GL-026-Guideline** – In IHMA, new solar and wind energy utility-scale and/or commercial development should be restricted. If development cannot be restricted due to existing authorized use, adjacent developments, or split estate issues, then ensure that stipulations are incorporated into the authorization to protect GRSG and their habitats.

**GRSG-GEN-ST-004-Standard** –In PHMA, IHMA and SFA, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat within the BSU and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3 percent cap (Appendix G).

**GRSG-GEN-ST-005-Standard** - In PHMA, SFA, and IHMA, only allow new authorized land uses if the residual impacts to GRSG or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix J).

**GRSG-LR-SUA-ST-013-Standard** – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized

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**LR-4:** PHMA: Development of new or expansion of existing landfills would not be allowed within PHMA. IHMA and GHMA are Avoidance and Open respectively for these types of ROW applications as described in LR-1.

**LR-5:** Consistent with LR-2, LR-3 and LR-4, Rights-of-way for development of new or amended ROWs and land use authorizations (including permits and leases) in PHMA would only be considered when consistent with the Anthropogenic Disturbance Screening Criteria (AD-3); Rights-of-way for development of new or amended ROWs and land use authorizations (including permits and leases) in IHMA could be considered consistent with the IHMA Anthropogenic Disturbance Development Criteria (AD-4). GHMA: New ROW and land use authorizations could be considered.

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**GRSG-GEN-ST-004-Standard** –In PHMA, IHMA and SFA, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat within the BSU and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3 percent cap (Appendix G).

**GRSG-GEN-ST-005-Standard** - In PHMA, SFA, and IHMA, only allow new authorized land uses if the residual impacts to GRSG or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix J).

**GRSG-LR-SUA-ST-013-Standard** – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized

**GRSG-GEN-ST-004-Standard** –In PHMA, IHMA and SFA, do not issue new discretionary written authorizations unless all existing discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat within the BSU and the proposed project area, regardless of ownership, and the new use will not cause exceedance of the 3 percent cap (Appendix G).

**GRSG-GEN-ST-005-Standard** - In PHMA, SFA, and IHMA, only allow new authorized land uses if the residual impacts to GRSG or their habitats are fully offset by compensatory mitigation projects that provide a net conservation gain to the species, which will be achieved

BLM Management Actions	Forest Service Plan Components
	<p>by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions. Any compensatory mitigation will be durable, timely, and in addition to what would have resulted without the compensatory mitigation, as addressed in the Mitigation Framework (Appendix J).</p> <p><b>GRSG-LR-SUA-ST-013-Standard</b> – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized</p>
<p><b>LR-6:</b> In PHMA, if a higher voltage transmission line is required adjacent to an existing line (i.e. the project is an incremental upgrade/capacity increase of existing development (i.e. powerline capacity upgrade):</p> <p>the existing transmission line must be removed and area rehabilitated within a specified amount of time after the new line is installed and energized; and the new line must be constructed in the same alignment as the existing line unless an alternate route would benefit GRSG or GRSG habitat.</p>	<p><b>GRSG-LR-SUA-ST-017-Standard</b> – In PHMA, IHMA, GHMA and SFAs, locate upgrades to existing transmission lines within the existing designated corridors or ROWs unless an alternate route would benefit GRSG or their habitats.</p>
<p><b>LR-7:</b> Existing designated corridors, including Section 368 Corridors, will remain Open in all habitat management areas (subject to the ongoing settlement agreement).</p>	<p>Not amended by this decision.</p>
<p><b>LR-8:</b> Process unauthorized use. If the unauthorized use is subsequently authorized, it would be authorized consistent with direction from this plan including RDFs, buffers and seasonal timing restrictions. If the use is not subsequently authorized the site would be reclaimed by removing these unauthorized (trespass) features and rehabilitating the habitat.</p>	<p>Forest Service policy does not provide for authorizing unauthorized uses.</p>
<p><b>LR-9:</b> Land use authorizations that are temporary (less than 3 years) in nature and are not otherwise excluded or restricted would be subject</p>	<p><b>GRSG-LR-SUA-ST-015-Standard</b> – In PHMA, IHMA and SFAs, do not authorize temporary lands special uses (i.e., facilities or activities)</p>

BLM Management Actions	Forest Service Plan Components
to seasonal or timing restrictions and mitigation requirements regarding habitat loss as needed.	that result in loss of habitat or would have long-term (i.e., greater than 5 years) negative impact on GRSG or their habitats.
<b>LR-10:</b> New ROW applications for water facilities (ditches, canals, pipelines), or amendments to existing water facilities which include additional structures to improve fish passage or benefits to fisheries (new diversions, fish screens) would be allowed on a case-by-case basis subject to RDFs to reduce impacts to GRSG habitat and mitigation requirements regarding GRSG habitat loss as needed.	No similar management direction.
<b>LR-11:</b> When a ROW grant expires and is not requested to be renewed, is relinquished, or terminated, the lease holder would be required to reclaim the site by removing overhead lines and other infrastructure and to eliminate avian predator nesting opportunities provided by anthropogenic development on public lands associated with the now void ROW grant (e.g., remove powerline and communication facilities no longer in service).	<b>GRSG-LR-SUA-ST-018-Standard</b> - In PHMA, IHMA, GHMA and SFAs, when a lands special use authorization is revoked or terminated and no future use is contemplated, require the authorization holder to remove overhead lines and other infrastructure in compliance with 36 CFR 251.60(i).
<b>LR-12:</b> As opportunities and priorities indicate work with existing ROW holders to retrofit existing towers and structures consistent with RDFs described in Appendix B.	<b>GRSG-LR-SUA-O-012-Objective</b> - In PHMA, IHMA and SFAs, retrofit existing tall structures (e.g., power poles, cellular towers) with perch deterrents or other anti-perching devices within 2 years of signing the Record of Decision.
<b>LR-13:</b> PHMA (Idaho and Montana) and IHMA (Idaho), and GHMA (Montana only) are designated as avoidance areas for high voltage transmission line and large pipeline ROWs, except for Gateway West and Boardman to Hemingway Transmission Projects. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the RDFs and avoidance criteria presented in AD-3 and AD-4 of this document. The BLM is currently processing an application for Gateway West and Boardman to Hemingway Transmission Projects and the NEPA review for this project is well underway. These projects are further discussed in the cumulative effects analysis. The BLM is analyzing GRSG mitigation measures through the projects' NEPA review process.	<b>GRSG-LR-SUA-ST-013-Standard</b> – In PHMA, IHMA and SFAs, restrict issuance of new lands special use authorizations for infrastructure, such as high-voltage transmission lines, major pipelines, hydropower, distribution lines, and cellular towers. Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to GRSG will be avoided by the exception. Existing authorized uses will continue to be recognized.
<b>LR-14:</b> Lands classified as PHMA, IHMA, and GHMA for GRSG will be retained in federal management unless: (1) the agency can demonstrate	<b>GRSG-LR-LOA-ST-022-Standard</b> – In PHMA, IHMA, GHMA and SFA, do not approve landownership adjustments unless the action

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## BLM Management Actions

that disposal of the lands will provide a net conservation gain to the GRSG or (2) the agency can demonstrate that the disposal of the lands will have no direct or indirect adverse impact on conservation of the GRSG. Land tenure adjustments would be subject to the following disposal, exchange, and acquisition criteria, which include retaining lands with GRSG habitat. Retention of areas with GRSG would reduce the likelihood of habitat conversion to agriculture, urbanization, or other uses that would remove sagebrush habitat and potentially impact sensitive plants. Criteria:

- a. Lands within PHMA, IHMA and GHMA would only be available for disposal through exchange (Appendix K).
- b. Acquire habitat within PHMA and IHMA, when possible (i.e. willing landowner), and retain ownership of habitat within all Areas, except if a land exchange would allow for additional or more contiguous federal ownership patterns.
- c. Lands within PHMA, IHMA and GHMA would be retained unless exchange of those lands would increase the extent or provide for connectivity of PHMA or IHMA.
- d. Evaluate potential land exchanges containing historically low-quality GRSG habitat that may be too costly to restore in exchange for lands of higher quality habitat, lands that connect seasonal GRSG habitats or lands providing for threatened and endangered species. These potential exchanges should lead to an increase in the extent or continuity of or provide for improved connectivity of PHMA. Higher priority will be given to exchanges for those in-tact areas of sagebrush that will contribute to the expansion of sagebrush areas within PHMA currently in public ownership. Lower priority would be given to other lands that would promote enhancement in the PHMA and IHMA (i.e., areas with fragmented or less in-tact sagebrush).
- e. Identify lands for acquisition that increase the extent of or provide for connectivity of PHMA.

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## Forest Service Plan Components

results in a net conservation gain to GRSG or it will not directly or indirectly adversely impact GRSG conservation.

**GRSG-LR-LOA-GL-023-Guideline** – In PHMA, IHMA, GHMA and SFA with minority federal ownership, consider landownership adjustments to achieve a landownership pattern (e.g., consolidation, reducing fragmentation) that supports improved GRSG population trends and habitats.

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**BLM Management Actions**

**FLM-OBJ-1:** Priority will be given to leasing and development of fluid mineral resources, including geothermal, outside of PHMA, IHMA, and GHMA. When analyzing leasing and authorizing development of fluid mineral resources, including geothermal, in PHMA, IHMA, and GHMA, and subject to applicable stipulations for the conservation of GRSG, priority will be given to development in non-habitat areas first and then in the least suitable habitat for GRSG. The implementation of these priorities will be subject to valid existing rights and any applicable law or regulation, including, but not limited to, 30 USC 226(p) and 43 CFR 3162.3-1(h).

**FLM-OBJ-2:** Where a proposed fluid mineral development project on an existing lease could adversely affect GRSG populations or habitat, the BLM will work with the lessees, operators, or other project proponents to avoid, minimize and apply compensatory mitigation to the extent compatible with lessees' rights to drill and produce fluid mineral resources. The BLM will work with the lessee, operator, or project proponent in developing an APD or Geothermal Drilling Permit (GDP) for the lease to avoid, minimize, and apply compensatory mitigation to impacts to GRSG or its habitat and will ensure that the best information about the GRSG and its habitat informs and helps to guide development of such Federal leases.

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**Forest Service Plan Components**

**GRSG-M-FMUL-ST-077-Standard** - In PHMA, and IHMA any new oil and gas leases must include an NSO stipulation. There will be no waivers or modifications. An exception could be granted by the authorized officer with unanimous concurrence from a team of agency GRSG experts from the USFWS, Forest Service, and State wildlife agency if:

- There would be no direct, indirect, or cumulative effects to GRSG or their habitats or
- Granting the exception provides an alternative to a similar action occurring on a nearby parcel and
- The exception provides a clear net conservation gain to GRSG.

**GRSG-M-FMUL-ST-078-Standard** – In GHMA, any new leases must include appropriate CSU and TL stipulations to protect GRSG and their habitat.

**GRSG-M-FMUL-ST-079-Standard** – In SFA, there will be NSO and no waivers, exceptions, or modifications for fluid mineral leasing.

**GRSG-M-FML-ST-080-Standard** – In PHMA, IHMA, and SFA, when approving the Surface Use Plan of Operation portion of the Application for Permit to Drill on existing leases that are not yet developed, require that leaseholders avoid and minimize surface disturbing and disruptive activities consistent with the rights granted in the lease.

**GRSG-M-FML-ST-081-Standard** – In PHMA, IHMA, and SFA, when facilities are no longer needed or leases are relinquished, require reclamation plans to include terms and conditions to restore habitat to desired conditions as described in Table 2-6.

**GRSG-M-FML-ST-082-Standard** – In GHMA, authorize new transmission line corridors, transmission line ROWs, transmission line construction, or transmission line-facility construction associated with fluid mineral leases with stipulations necessary to protect GRSG and their habitats, consistent with the terms and conditions of the permit.



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**BLM Management Actions****Forest Service Plan Components**

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**GRSG-M-FML-ST-083-Standard** – Locate compressor stations on portions of a lease that are non-habitat and are not used by GRSG, and if there would be no direct, indirect, or cumulative effects on GRSG or their habitat. If this is not possible, work with the operator to use mufflers, sound insulation, or other features to reduce noise, consistent with GRSG-GEN-ST-006-Standard.

**GRSG-M-FML-ST-084-Standard** – In PHMA, GHMA and SFA, when authorizing development of fluid mineral resources, work with the operator to minimize impacts to GRSG and their habitat, such as locating facilities in non-habitat areas first and then in the least suitable habitat.

**GRSG-M-FML-GL-085-Guideline** – In PHMA, IHMA, GHMA and SFA, operators should be encouraged to reduce disturbance to GRSG habitat. At the time of approval of the Surface Use Plan of Operation portion of the Application for Permit to Drill, terms and conditions should be included to reduce disturbance to GRSG habitat, where appropriate and feasible and consistent with the rights granted to the lessee.

**GRSG-M-FML-GL-086-Guideline** – On existing federal leases in PHMA, IHMA, and SFA, when surface occupancy cannot be restricted due to valid existing rights or development requirements, disturbance and surface occupancy should be limited to areas least harmful to GRSG based on vegetation, topography, or other habitat features.

**GRSG-M-FML-GL-087-Guideline** - In PHMA, SFA, and GHMA, where the federal government owns the surface and the mineral estate is in non-federal ownership, coordinate with the mineral estate owner/lessee to apply appropriate stipulations, conditions of approval, conservation measures and RDFs to the appropriate surface management instruments to the maximum extent permissible under existing authorities.

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**FLM-I (Fluid Minerals):** Idaho and Montana: Areas within SFAs would be open to fluid mineral leasing and development and

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**GRSG-M-FMUL-ST-077-Standard** - In PHMA, and IHMA any new oil and gas leases must include an NSO stipulation. There will be no

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BLM Management Actions	Forest Service Plan Components
<p>geophysical exploration subject to NSO without waiver, exception, or modification. Areas within PHMA and IHMA would be open to mineral leasing and development and geophysical exploration subject to NSO with a limited exception (FLM-3). GHMA would be open to mineral leasing and development and geophysical exploration subject to CSU which includes buffers, seasonal timing restrictions (see Appendix C) and standard stipulations.</p>	<p>waivers or modifications. An exception could be granted by the authorized officer with unanimous concurrence from a team of agency GRSG experts from the USFWS, Forest Service, and State wildlife agency if:</p> <ul style="list-style-type: none"> <li>• There would be no direct, indirect, or cumulative effects to GRSG or their habitats or</li> <li>• Granting the exception provides an alternative to a similar action occurring on a nearby parcel and</li> <li>• The exception provides a clear net conservation gain to GRSG.</li> </ul> <p><b>GRSG-M-FMUL-ST-078-Standard</b> – In GHMA, any new leases must include appropriate CSU and TL stipulations to protect GRSG and their habitat.</p>
<p><b>FLM-2:</b> In Idaho, parcels nominated for lease in PHMA or IHMA would be evaluated prior to lease offering to determine if development is feasible. In GHMA, parcels would not be offered for lease if buffers and restrictions (including RDFs) preclude development in the leasing area.</p>	<p>No similar management direction. Forest Service makes availability decisions not feasibility decisions.</p>
<p><b>FLM-3:</b> PHMA and IHMA: No waivers or modifications to a fluid mineral lease NSO stipulation will be granted. The Authorized Officer may grant an exception to a fluid mineral lease NSO stipulation only where the proposed action:</p> <ol style="list-style-type: none"> <li>i. Would not have direct, indirect, or cumulative effects on GRSG or its habitat; or,</li> <li>ii. Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear conservation gain to GRSG.</li> </ol> <p>Exceptions based on conservation gain (ii) may only be considered in (a) PHMAs of mixed ownership where federal minerals underlie less than fifty percent of the total surface, or (b) areas of the public lands where the proposed exception is an alternative to an action occurring on a nearby parcel subject to a valid Federal fluid mineral lease existing as of the date of this RMP amendment. Exceptions based on</p>	<p><b>GRSG-M-FMUL-ST-077-Standard</b> - In PHMA, and IHMA any new oil and gas leases must include an NSO stipulation. There will be no waivers or modifications. An exception could be granted by the authorized officer with unanimous concurrence from a team of agency GRSG experts from the USFWS, Forest Service, and State wildlife agency if:</p> <ul style="list-style-type: none"> <li>• There would be no direct, indirect, or cumulative effects to GRSG or their habitats or</li> <li>• Granting the exception provides an alternative to a similar action occurring on a nearby parcel and</li> <li>• The exception provides a clear net conservation gain to GRSG</li> </ul>

conservation gain must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts.

Any exceptions to this lease stipulation may be approved by the Authorized Officer only with the concurrence of the State Director. The Authorized Officer may not grant an exception unless the applicable state wildlife agency, the USFWS, and the BLM unanimously find that the proposed action satisfies (i) or (ii). Such finding shall initially be made by a team of one field biologist or other GRSG expert from each respective agency. In the event the initial finding is not unanimous, the finding may be elevated to the appropriate BLM State Director, USFWS State Ecological Services Director, and state wildlife agency head for final resolution. In the event their finding is not unanimous, the exception will not be granted. Approved exceptions will be made publically available at least quarterly.

Waivers, Exceptions and Modifications (WEMs) (Source IM-2008-032):

A waiver is a permanent exemption from a lease stipulation, the stipulation would no longer apply anywhere within the lease. Waivers, by regulation, require a 30-day public review if the authorized officer has determined, prior to lease issuance, that a stipulation involves an issue of major concern to the public (43 CFR 3101.4) and are approved and signed by the State Director.

An exception is a one-time exemption for a particular site within the lease; exceptions are determined on a case-by-case basis; the stipulation continues to apply to all other sites within the lease. An exception is a limited type of waiver.

A modification is a change to the provisions of a lease stipulation, either temporarily or for the term of the lease. Depending on the specific modification, the stipulation may or may not apply to all sites within the lease to which the restrictive criteria are applied.

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**BLM Management Actions**

**FLM-4:** Incorporate required design features and best management practices appropriate to the management area as COAs when post leasing activity is proposed into any post-lease authorizations.

**Forest Service Plan Components**

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**GRSG-M-FMO-ST-088-Standard** – In PHMA, IHMA and SFA, do not authorize employee camps.

**GRSG-M-FMO-ST-089-Standard** – In PHMA, IHMA and SFA, when feasible, do not locate tanks or other structures that may be used as raptor perches. If this is not feasible, use perch deterrents.

**GRSG-M-FMO-GL-090-Guideline** – In PHMA, IHMA and SFA, closed-loop systems should be used for drilling operations with no reserve pits, where feasible.

**GRSG-M-FMO-GL-091-Guideline** – In PHMA, IHMA, GHMA and SFA, during drilling operations, soil compaction should be minimized and soil structure should be maintained using the best available techniques to improve vegetation reestablishment.

**GRSG-M-FMO-GL-092-Guideline** – In PHMA, IHMA, GHMA and SFA, dams, impoundments and ponds for mineral development should be constructed to reduce potential for West Nile virus. Examples of methods to accomplish this include:

- Increase the depth of ponds to accommodate a greater volume of water than is discharged.
  - Build steep shorelines (greater than 2 feet) to reduce shallow water and aquatic vegetation around the perimeter of impoundments to reduce breeding habitat for mosquitoes.
  - Maintain the water level below that of rooted aquatic and upland vegetation. Avoid flooding terrestrial vegetation in flat terrain or low-lying areas.
  - Construct dams or impoundments that restrict down-slope seepage or overflow by digging ponds in flat areas rather than damming natural draws for effluent water storage or lining constructed ponds in areas where seepage is anticipated.
  - Line the channel where discharge water flows into the pond with crushed rock or use a horizontal pipe to discharge inflow directly into existing open water.
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BLM Management Actions	Forest Service Plan Components
	<ul style="list-style-type: none"> <li>• Line the overflow spillway with crushed rock and construct the spillway with steep sides.</li> <li>• Fence pond sites to restrict access by livestock and other wild ungulates.</li> <li>• Remove or re-inject produced water.</li> <li>• Treat waters with larvicides to reduce mosquito production where water occurs on the surface.</li> </ul> <p><b>GRSG-M-FMO-GL-0093-Guideline</b> – In PHMA, IHMA, GHMA and SFA to keep habitat disturbance at a minimum, a phased development approach should be applied to fluid mineral operations, wherever possible, consistent with the rights granted under the lease. Disturbed areas should be reclaimed as soon as they are no longer needed for mineral operations.</p>
<p><b>FLM-5:</b> In Montana, prior to leasing conduct a Master Leasing Plan process when all four of the following criteria are met:</p> <p>A substantial portion of the area to be analyzed in the MLP is not currently leased.</p> <p>There is a majority Federal mineral interest.</p> <p>The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the general area.</p> <p>Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are:</p> <p>multiple-use or natural/cultural resource conflicts;</p> <p>impacts to air quality;</p> <p>impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the</p>	<p>No similar action</p>

BLM Management Actions	Forest Service Plan Components
<p>USFWS, or the Forest Service; or impacts on other specially designated areas. – analyzing likely development scenarios and varying mitigation levels.</p>	
<p><b>FLM-5:</b> In Idaho, complete a Master Development Plan, consistent with plan development guide on leases where a producing field is proposed to be developed.</p>	<p>Forest Service will work with the BLM to complete Master Development plans.</p>
<p><b>FLM-6:</b> Encourage unitization when deemed necessary for proper development and operation of an area (with strong oversight and monitoring). The unitization must be designed in a manner to minimize adverse impacts on GRSG according to the Federal Lease Form, 3100-11, Sections 4 and 6.</p>	<p>BLM’s responsibility.</p>
<p><b>FLM-7:</b> Issue Written Orders of the Authorized Officer (43 CFR 3161.2) requiring reasonable protective measures consistent with the lease terms where necessary to avoid or minimize effects to GRSG populations or habitat.</p>	<p>No similar management direction.</p>
<p><b>LOC-2:</b> Apply reasonable and appropriate RDFs to locatable minerals consistent with applicable law to prevent unnecessary or undue degradation of GRSG habitat when a Plan of Operations is submitted for BLM or Forest Service approval, in accordance with 43 CFR 3809.411(d)(2) (or 36 CFR 228.5(a)(3) on National Forest System lands).</p>	<p><b>GRSG-M-LM-ST-097-Standard</b> – In PHMA, IHMA and SFA, only approve Plans of Operation if they include mitigation to protect GRSG and their habitats, consistent with the rights of the mining claimant as granted by the General Mining Act of 1872, as amended.</p> <p><b>GRSG-M-LM-GL-098-Guideline</b> – In PHMA, IHMA, GHMA and SFA to keep habitat disturbance at a minimum, a phased development approach should be applied to operations consistent with the rights granted under the General Mining Act of 1872, as amended. Disturbed areas should be reclaimed as soon as they are no longer needed for mineral operations.</p> <p><b>GRSG-M-LM-GL-099-Guideline</b> - In PHMA, IHMA, GHMA and SFA, abandoned mine sites should be closed or mitigated to reduce predation of GRSG by eliminating tall structures that could provide nesting opportunities and perching sites for predators</p>

BLM Management Actions	Forest Service Plan Components
<p><b>LOC-3:</b> Recommend SFAs for withdrawal from the General Mining Act of 1872, as amended, subject to valid existing rights.</p>	<p><b>GRSG-LR-LW-GL-024-Guideline</b> – In priority and important habitat management areas and sagebrush focal areas, use land withdrawals as a tool, where appropriate, to prevent activities that will be detrimental to greater sage-grouse or their habitats.</p>
<p><b>SAL-1 (Salable Minerals):</b> PHMA: All PHMAs will be closed to mineral materials development. However, existing free use permits and the expansion of existing free use permits may be considered only if the following criteria are met:</p> <ul style="list-style-type: none"> <li>the project area disturbance cap is not exceeded within a BSU;</li> <li>the activity is subject to the provisions set forth in the mitigation framework [Appendix J];</li> <li>all applicable required design features are applied; and</li> <li>the activity is permissible under the Idaho exception and development criteria (AD-3 and AD-4)</li> </ul> <p>IHMA: All IHMA will be open to mineral materials development, consistent with the Idaho Anthropogenic Disturbance Criteria (AD-4), and subject to RDFs, buffers and seasonal timing restrictions. Sales from existing community pits within IHMA would be subject to seasonal timing restrictions.</p> <p>GHMA: All GHMA will be open to mineral materials development, subject to RDFs, buffers and seasonal timing restrictions. Sales from existing community pits within GHMA would be subject to seasonal timing restrictions.</p>	<p><b>GRSG-M-MM-ST-0102-Standard</b> – In PHMA and SFA, do not allow new mineral material disposal or development.</p> <p><b>GRSG-M-MM-ST-103-Standard</b> – In PHMA, IHMA and SFA, free-use mineral material collection permits may be issued and expansion of existing active pits may be allowed, except from March 1 to April 30 between 6 pm and 9 am within 2 miles from the perimeter of occupied leks, within the BSU and proposed project area, if doing so does not exceed the disturbance cap.</p> <p><b>GRSG-M-MM-ST-104-Standard</b> - In PHMA, IHMA, GHMA and SFA, any permit for existing mineral material operations must include appropriate requirements for operation and reclamation of the site to restore, enhance, or maintain desired habitat conditions (Table 2-6).</p>
<p><b>SAL-2:</b> Restore salable mineral pits no longer in use to meet GRSG habitat management objectives.</p>	<p><b>GRSG-M-MM-ST-104-Standard</b> - In PHMA, IHMA, GHMA and SFA, any permit for existing mineral material operations must include appropriate requirements for operation and reclamation of the site to restore, enhance, or maintain desired habitat conditions (Table 2-6).</p>

BLM Management Actions	Forest Service Plan Components
<p><b>SAL-3:</b> Require reclamation bonding that would require restoration of GRSG habitat on new site authorizations for mineral material pits in IHMA (this would not apply to free use permits issued to a government entity such as a county road district, but would apply to non-profit entities).</p>	<p><b>GRSG-M-MM-ST-104-Standard</b> - In PHMA, IHMA, GHMA and SFA, any permit for existing mineral material operations must include appropriate requirements for operation and reclamation of the site to restore, enhance, or maintain desired habitat conditions (Table 2-6).</p>
<p><b>SAL-4:</b> Montana: PHMAs are closed to new mineral material sales. However, these areas remain “open” to free use permits and the expansion of existing active pits, only if the following criteria are met: the activity is within the BSU and project area disturbance cap; the activity is subject to the provisions set forth in the mitigation framework [Appendix J]; all applicable required design features are applied; and the activity is permissible under the Montana screening criteria (AD-4) Appendix I.</p>	<p><b>GRSG-M-MM-ST-0102-Standard</b> – In PHMA and SFA, do not allow new mineral material disposal or development.</p> <p><b>GRSG-M-MM-ST-103-Standard</b> – In PHMA, IHMA and SFA, free-use mineral material collection permits may be issued and expansion of existing active pits may be allowed, except from March 1 to April 30 between 6 pm and 9 am within 2 miles from the perimeter of occupied leks, within the BSU and proposed project area, if doing so does not exceed the disturbance cap.</p> <p><b>GRSG-M-MM-ST-104-Standard</b> - In PHMA, IHMA, GHMA and SFA, any permit for existing mineral material operations must include appropriate requirements for operation and reclamation of the site to restore, enhance, or maintain desired habitat conditions (Table 2-6).</p>
<p><b>NEL-1 (Nonenergy Leasables):</b> PHMAs are closed to leasing. IHMA and GHMA: Areas within Known Phosphate Leasing Areas (KPLAs) will remain open to leasing subject to standard stipulations. IHMA areas outside of KPLAs are open to prospecting and subsequent leasing provided the Anthropogenic Disturbance Development Criteria (AD-4) and the anthropogenic disturbance cap (AD-1) can be met. RDFs, buffers and seasonal timing restrictions shall be applied to prospecting permits. GHMA: Lands outside KPLAs are available for prospecting and subsequent leasing and initial mine development subject to RDFs, buffers, timing restrictions (seasonal and daily) and standard stipulations.</p>	<p><b>GRSG-M-NEL-GL-100-Guideline</b> – In PHMA, IHMA, GHMA and SFA, at the time of issuance of prospecting permits, exploration licenses and leases, or readjustment of leases, the Forest Service should provide recommendations to the BLM for the protection of GRSG and their habitats.</p> <p><b>GRSG-M-NEL-GL-101-Guideline</b> - In PHMA, SFA, GHMA, the Forest Service should recommend to the BLM that expansion or readjustment of existing leases avoid, minimize, or mitigate the effects to GRSG and their habitat.</p>
<p><b>NEL-2:</b> Require seasonal and daily timing restrictions in undeveloped nonenergy mineral leases when exploration activities or initial mine development is proposed (e.g. exploration drilling, timber removal, shrub clearing, etc.) as COAs.</p>	<p><b>GRSG-M-NEL-GL-100-Guideline</b> – In PHMA, IHMA, GHMA and SFA, at the time of issuance of prospecting permits, exploration licenses and leases, or readjustment of leases, the Forest Service should provide recommendations to the BLM for the protection of</p>



BLM Management Actions	Forest Service Plan Components
	<p>GRSG and their habitats.</p> <p><b>GRSG-M-NEL-GL-101-Guideline</b> - In PHMA, SFA, GHMA, the Forest Service should recommend to the BLM that expansion or readjustment of existing leases avoid, minimize, or mitigate the effects to GRSG and their habitat.</p>
<p><b>NEL-3:</b> Include RDFs as COAs to mine plans in undeveloped non-energy mineral leases for exploration activities or initial mine development.</p>	<p><b>GRSG-M-NEL-GL-100-Guideline</b> – In PHMA, IHMA, GHMA and SFA, at the time of issuance of prospecting permits, exploration licenses and leases, or readjustment of leases, the Forest Service should provide recommendations to the BLM for the protection of GRSG and their habitats.</p>
<p><b>MSE-1 (Mineral Split Estate):</b> BLM Owns Mineral Estate – non-federal surface owner: Where the federal government owns the mineral estate in PHMAs, IHMAs, and GHMAs, and the surface is in non-federal ownership, apply the same stipulations, COAs, and/or conservation measures and RDFs applied if the mineral estate is developed on BLM-administered lands in that management area, to the maximum extent permissible under existing authorities, and in coordination with the landowner.</p>	<p>No similar management direction.</p>
<p><b>MSE-2:</b> BLM owns surface – non-federal mineral estate owner: Where the federal government owns the surface and the mineral estate is in non-federal ownership in PHMA, IHMA, and GHMA, apply appropriate surface use COAs, stipulations, and mineral RDFs through ROW grants or other surface management instruments, to the maximum extent permissible under existing authorities, in coordination with the mineral estate owner/lessee.</p>	<p><b>GRSG-M-FML-GL-087-Guideline</b> - In PHMA, SFA, and GHMA, where the federal government owns the surface and the mineral estate is in non-federal ownership, coordinate with the mineral estate owner/lessee to apply appropriate stipulations, conditions of approval, conservation measures and RDFs to the appropriate surface management instruments to the maximum extent permissible under existing authorities.</p>
<p><b>Coal-1</b> At the time an application for a new coal lease or lease modification is submitted to the BLM, the BLM will determine whether the lease application area is "unsuitable" for all or certain coal mining methods pursuant to 43 CFR 3461.5. PHMA is essential habitat for maintaining GRSG for purposes of the suitability criteria set forth at 43 CFR 3461.5(o)(1).</p>	<p><b>GRSG-M-CMUL-ST-094-Standard</b> – In PHMA, IHMA and SFA, do not authorize surface disturbances (e.g., appurtenant facilities) for new underground coal mines.</p>

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**BLM Management Actions****Forest Service Plan Components**

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**TM-1 (Travel Management):** Limit off-highway vehicle travel within Idaho BLM Field Offices to existing roads, primitive roads, and trails in areas where travel management planning has not been completed or is in progress. This excludes areas previously designated as open through a land use plan decision or currently under review for designation as open, currently being analyzed in ongoing RMP revision efforts in the Four Rivers, Jarbidge and Upper Snake Field Offices.

An off-highway vehicle is any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) Any nonamphibious registered motorboat; (2) any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) Vehicles in official use where official use is use by an employee, agent, or designated representative of the Federal Government or one of its contractors, in the course of his employment, agency, or representation.; and (5) any combat or combat support vehicle when used in times of national defense emergencies (43 CFR 8340.0 5).

**TM-2:** In PHMA, IHMA, and GHMA, temporary closures will be considered in accordance with 43 CFR subpart 8364 (Closures and Restrictions); 43 CFR subpart 8351 (Designated National Area); 43 CFR subpart 6302 (Use of Wilderness Areas, Prohibited Acts, and Penalties); 43 CFR subpart 8341 (Conditions of Use).

Temporary closure or restriction orders under these authorities are enacted at the discretion of the authorized officer to resolve management conflicts and protect persons, property, and public lands and resources. Where an authorized officer determines that off-highway vehicles are causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources, the affected areas shall be immediately closed to the type(s) of vehicle causing the adverse effect until the adverse effects are eliminated and measures

**GRSG-RT-DC-0068-Desired Condition** - In PHMA, IHMA, GHMA and SFAs, within the travel management system, GRSG experience minimal disturbance during breeding and nesting (March 1 to June 15) and wintering (November 1 to February 28) periods.

Also 36 CFR 212 subpart B.

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36 CFR 261 subpart A

BLM Management Actions	Forest Service Plan Components
<p>implemented to prevent recurrence. (43 CFR 8341.2) A closure or restriction order should be considered only after other management strategies and alternatives have been explored. The duration of temporary closure or restriction orders should be limited to 24 months or less; however, certain situations may require longer closures and/or iterative temporary closures. This may include closure of routes or areas.</p>	
<p><b>TM-3:</b> Develop Travel Management Plans for each Field Office as described in the BLM Travel Management Handbook 8342.1 and according to the travel management planning guidelines (Appendix L).</p>	36 CFR 212
<p><b>TM-4:</b> During subsequent travel management planning design and designate a travel system to minimize adverse effects on GRSG. Locate areas and trails to minimize disturbance of GRSG and/or to have a neutral or positive effect on GRSG habitat and populations. Give special attention to protect endangered or threatened species and their habitats. Allow for route upgrade, closure of existing routes, timing restrictions, seasonal closures, and creation of new routes to help protect habitat and meet user group needs, thereby reducing the potential for pioneering unauthorized routes. The emphasis of the comprehensive travel and transportation planning within PHMA would be placed on having a neutral or positive effect on GRSG habitat. Individual route designations would occur during subsequent travel management planning efforts.</p>	36 CFR 212
<p><b>TM-5:</b> Conduct road construction, upgrades, and maintenance activities to avoid disturbance during the lekking season – see Appendix C.</p>	<p><b>GRSG-RT-ST-069-Standard</b> – In PHMA, IHMA, GHMA and SFAs, do not conduct or allow new road or trail construction (does not apply to realignments for resource protection) except when necessary for administrative access, public safety, or to access valid existing rights. If necessary to construct new roads and trails for one of these purposes, construct them to the minimum standard, length, and number and avoid, minimize, and mitigate impacts.</p> <p><b>GRSG-RT-ST-070-Standard</b> – Do not conduct or allow road and trail maintenance activities within 2 miles from the perimeter of active leks during lekking (March 1 to April 30) from 6 pm to 9 am.</p>

BLM Management Actions	Forest Service Plan Components
	<p><b>GRSG-RT-ST-071-Standard</b> – In PHMA, IHMA and SFAs, prohibit public access on temporary energy development roads, unless consistent with all other terms and conditions included in the forest plan.</p> <p><b>GRSG-RT-GL-072-Guideline</b> – In PHMA, IHMA and SFAs, new roads and road realignments should be designed and administered to reduce collisions with GRSG.</p> <p><b>GRSG-RT-GL-073-Guideline</b> – In PHMA, IHMA, and SFAs, road construction within riparian areas and mesic meadows should be restricted. If not possible to restrict construction within riparian areas and mesic meadows, roads should be designed and constructed at right angles to ephemeral drainages and stream crossings, unless topography prevents doing so.</p> <p><b>GRSG-RT-GL-074-Guideline</b> – In PHMA, IHMA, GHMA and SFAs, when decommissioning roads and unauthorized routes, restoration activity should be designed to move habitat towards desired conditions (Table 2-6).</p> <p><b>GRSG-RT-GL-076-Guideline</b> - In PHMA, IHMA, GHMA and SFAs, road and road-way maintenance activities should be designed and implemented to reduce the risk of vehicle or human-caused wildfires and the spread of invasive plants. Such activities include but are not limited to the removal or mowing of vegetation a car-width off the edge of roads; use of weed-free earth-moving equipment, gravel, fill, or other materials; and blading or pulling roadsides and ditches that are infested with noxious weeds only if required for public safety or protection of the roadway.</p>
<p><b>REC-1:</b> Manage existing recreation uses and sites to minimize adverse effects on GRSG or their habitat through incorporation of RDFs, buffers and seasonal restrictions.</p>	<p><b>GRSG-R-DC-064-Desired Condition</b> – In PHMA, IHMA, GHMA and SFA, existing and new recreation special use authorizations and expansion of special use authorizations avoids effects to GRSG and their habitats.</p>
<p><b>REC-2:</b> In PHMA and IHMA, do not construct new recreation facilities (e.g., campgrounds, trails, trailheads, staging areas) unless the</p>	<p><b>GRSG-R-GL-067-Guideline</b> – In PHMA, SFA, and IHMA, new recreational facilities or expansion of existing recreational facilities</p>

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**BLM Management Actions**

development would have a net conservation gain to GRSG habitat (such as concentrating recreation, diverting use away from critical areas, etc.), or unless the development is required for visitor health and safety or resource protection.

RDFs are means, measures, or practices intended to reduce or avoid adverse environmental impacts. This LUPA/EIS proposes a suite of design features that would establish the minimum specifications for water developments, certain mineral development, and fire and fuels management and would mitigate adverse impacts. These design features would be required to provide a greater level of regulatory certainty than through implementing BMPs.

In general, the design features are accepted practices that are known to be effective when implemented properly at the project level. However, their applicability and overall effectiveness cannot be fully assessed except at the project-specific level when the project location and design are known. Because of site-specific circumstances, some features may not apply to some projects (e.g., when a resource is not present on a given site) or may require slight variations from what is described in the LUPA/EIS (e.g., a larger or smaller protective area). All variations in design features would require appropriate analysis and disclosure as part of future project authorizations. Additional mitigation measures may be identified and required during individual project development and environmental review. The proposed RDFs are presented in Appendix B, Greater Sage-Grouse Habitat Required Design Features and Best Management Practices.

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**Forest Service Plan Components**

(e.g., roads, trails, campgrounds), including special use authorizations for facilities and activities, should not be approved unless the development results in a net conservation gain to GRSG and/or their habitats or the development is required for visitor safety.

**GRSG-R-ST-065-Standard** – In PHMA, IHMA and SFA, do not authorize temporary recreation uses (i.e., facilities or activities) that result in loss of habitat or would have long-term (i.e., greater than 5 years) negative impacts on GRSG or their habitats.

**GRSG-R-GL-066-Guideline** – In PHMA, IHMA, GHMA and SFA, terms and conditions that protect and/or restore GRSG habitat within the permit area should be included in new recreation special use authorizations. During renewal, amendment, or reauthorization, terms and conditions in existing permits and operating plans should be modified to protect and/or restore GRSG habitat.

**Table 2-1**  
**Seasonal Habitat Desired Conditions for GRSG on BLM-Administered Lands**

Attribute	Indicator	Desired Condition	Reference
<b>BREEDING HABITAT (LEK AND NESTING/EARLY BROOD REARING)</b>			
<b>Breeding and Nesting (Seasonal Use Period March 1 – June 15)<sup>1</sup></b>			
Lek Security	Proximity of trees	Trees (i.e., in Idaho mainly juniper, conifers, and does not include old-growth juniper, pinyon pine and mountain mahogany; in Montana mainly Douglas-fir) absent or uncommon on shrub/grassland ecological sites within 1.86 miles (3 km) of occupied leks.	Baruch-Mordo et al. 2013 <sup>7</sup> Stiver et al. <i>in press</i> <sup>13</sup>
	Proximity of sagebrush to leks	Adjacent protective sagebrush cover within 328 ft. (100 m) of an occupied lek	Stiver et al. <i>in press</i> <sup>13</sup>
<b>NESTING/EARLY BROOD REARING<sup>1,5,10,12,13,14</sup></b>			
Cover and Food	Seasonal habitat extent (Percent of Seasonal Habitat Meeting Desired Conditions)	>80% of the nesting habitat meets the recommended vegetation characteristics, where appropriate (relative to ecological site potential, etc.).	Connelly et al. 2000 <sup>8</sup>
	Sagebrush cover <sup>2</sup>	15-25%	Connelly et al. 2000 <sup>8</sup> Connelly et al. 2003 <sup>9</sup> Hagen et al. 2007 <sup>11</sup>
	Sagebrush height		Connelly et al. 2000 <sup>8</sup>
	Arid sites <sup>3</sup>	12-31 inches (30-80cm)	
	Mesic sites <sup>4</sup>	16-31 inches (40-80cm)	
	Predominant sagebrush shape	Predominantly spreading shape <sup>5</sup>	Stiver et al. <i>in press</i> <sup>13</sup>
	Perennial grass cover <sup>2</sup>		Connelly et al. 2000 <sup>8</sup>
	Arid sites <sup>3</sup>	≥10%	Stiver et al. <i>in press</i> <sup>13</sup>
Mesic sites <sup>4</sup>	≥15		
Perennial grass (and forb) height	≥ 7 inches	Connelly et al. 2000 <sup>8</sup> Connelly et al. 2003 <sup>9</sup>	

**Table 2-1  
Seasonal Habitat Desired Conditions for GRSG on BLM-Administered Lands**

<b>Attribute</b>	<b>Indicator</b>	<b>Desired Condition</b>	<b>Reference</b>
			Hagen et al. 2007 <sup>11</sup>
	Perennial forb cover <sup>2</sup>		Stiver et al. <i>in press</i> <sup>13</sup> Connelly et al. 2000 <sup>8</sup>
	Arid sites <sup>3</sup>	≥5%	
	Mesic sites <sup>4</sup>	≥10%	
	Perennial forb availability	Preferred forbs are common with several species present <sup>6</sup>	Stiver et al. <i>in press</i> <sup>13</sup>
<b>LATE BROOD-REARING/SUMMER<sup>1, 15</sup> (July-October)<sup>1</sup> Late brood-rearing areas, such as riparian, meadows, springs, higher elevation mesic uplands, etc. may occur within other mapped seasonal habitat areas. Apply late brood rearing/summer habitat desired conditions locally as appropriate.</b>			
Cover and Food	Seasonal habitat extent (Percent of Seasonal Habitat Meeting Desired Condition)	>40% of the summer/brood habitat meets recommended brood habitat characteristics where appropriate (relative to ecological site potential, etc.)	Connelly et al. 2000 <sup>8</sup>
	Sagebrush cover <sup>2</sup>	Uplands 10-25% Riparian/Meadow: Sagebrush cover within 100 m	Connelly et al. 2000 <sup>8</sup>
	Sagebrush height	16 to 32 inches (40-80cm)	Connelly et al. 2000 <sup>8</sup>
	Perennial grass and forb cover <sup>2</sup>	>15%	
	Upland and riparian perennial forb availability <sup>2</sup>	Preferred forbs are common with appropriate numbers of species present <sup>6</sup>	Stiver et al. <i>in press</i> <sup>13</sup>
	Riparian and/or meadow habitat condition	Proper Functioning Condition	Stiver et al. <i>in press</i> <sup>13</sup>

**Table 2-1  
Seasonal Habitat Desired Conditions for GRSG on BLM-Administered Lands**

Attribute	Indicator	Desired Condition	Reference
<b>WINTER<sup>1</sup> November-March<sup>1</sup> (Apply to areas of known or likely winter-use)</b>			
Cover and Food	Seasonal habitat extent (Percent of Seasonal Habitat Meeting Desired Condition)	>80% of the wintering habitat meets winter habitat characteristics where appropriate (relative to ecological site, etc.).	Connelly et al. 2000 <sup>8</sup>
	Sagebrush cover and height above snow.	Sagebrush is at least 10 inches (25 cm) above snow and ≥10% cover <sup>16</sup>	Connelly et al. 2000 <sup>8</sup> Stiver et al. <i>in press</i> <sup>13</sup>

**Table 2-6  
Seasonal Habitat Desired Conditions for Greater Sage-grouse**

Attribute	Indicators	Desired Condition
<b>BREEDING AND NESTING<sup>1,2,3</sup> (Seasonal Use Period March 1-June 15) Apply 6.2 miles from active leks.<sup>4</sup></b>		
Cover	Proximity of trees <sup>5</sup>	Trees or other tall structures are absent to uncommon within 1.86 miles of leks <sup>6,7</sup>
	Proximity of sagebrush to leks <sup>6</sup>	Adjacent protective sagebrush cover within 328 feet of lek <sup>6</sup>
	Seasonal habitat extent <sup>7</sup> (Percent of seasonal habitat meeting desired conditions.)	>80% of the breeding and nesting habitat
	Sagebrush canopy cover <sup>6,7,8</sup>	15 to 25%
	Sagebrush height <sup>7</sup>	
	Arid sites <sup>6,7,9</sup>	12 to 32 inches
	Mesic sites <sup>6,7,10</sup>	16 to 32 inches
	Predominant sagebrush shape <sup>6</sup>	>50% in spreading <sup>11</sup>
Perennial grass canopy cover <sup>6,7</sup>		
Arid sites <sup>7,9</sup>	≥10%	
Mesic sites <sup>7,10</sup>	≥15%	
Perennial grass height <sup>6,7,8</sup>	Provide overhead and lateral concealment from predators <sup>7, 15</sup>	



**Table 2-6**  
**Seasonal Habitat Desired Conditions for Greater Sage-grouse**

<b>Attribute</b>	<b>Indicators</b>	<b>Desired Condition</b>
	Perennial forb canopy cover <sup>6,7,8</sup>	
	Arid sites <sup>9</sup>	≥5% <sup>6,7</sup>
	Mesic sites <sup>10</sup>	≥10% <sup>6,7</sup>
<b>BROOD-REARING/SUMMER<sup>1</sup> (Seasonal Use Period June 16-October 31)</b>		
Cover	Seasonal habitat extent <sup>7</sup> (Percent of seasonal habitat meeting desired conditions.)	>40% of the brood-rearing/summer habitat
	Sagebrush canopy cover <sup>6,7,8</sup>	10 to 25%
	Sagebrush height <sup>7,8</sup>	16 to 32 inches
	Perennial grass canopy cover and forbs <sup>7,8</sup>	>15%
	Riparian areas/mesic meadows	Proper Functioning Condition <sup>12</sup>
	Upland and riparian perennial forb availability <sup>6,7</sup>	Preferred forbs are common with several preferred species present <sup>13</sup>
<b>WINTER<sup>1</sup> (Seasonal Use Period November 1-February 28)</b>		
Cover and Food	Seasonal habitat extent <sup>6,7,8</sup> (Percent of seasonal habitat meeting desired conditions.)	>80% of the winter habitat
	Sagebrush canopy cover above snow <sup>6,7,8</sup>	>10%
	Sagebrush height above snow <sup>6,7,8</sup>	>10 inches <sup>14</sup>

<sup>1</sup>Seasonal dates can be adjusted; that is, start and end dates may be shifted either earlier or later, but the amount of days cannot be shortened or lengthened by the local unit.

<sup>2</sup> Doherty, K. 2008. *Sage-grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts*. University of Montana. Missoula, MT.

<sup>3</sup> Holloran and Anderson. 2005. *Spatial Distribution of Greater Sage-grouse nests in relatively contiguous sagebrush habitats*. Condor 107:742-752.

<sup>4</sup> Buffer distance may be changed only if 3 out of 5 years of telemetry studies indicate the 6.2 miles is not appropriate.

<sup>5</sup> Baruch-Mordo, S. J.S. Evans, J.P Severson, D.E. Naugle, J. D. Maestas, J.M. Kiesecker, M.J. Falkowski. C.A. Hagen, and K.P. Reese. . 2013. *Saving sage-grouse from trees: A proactive solution to reducing a key threat to a candidate species*. Biological Conservation 167: 233-241.

<sup>6</sup> Stiver, S.J., E.T. Rinkes, D.E. Naugle, P.D. Makela, D.A. Nance, and J.W. Karl, eds. [In press]. *Sage-Grouse Habitat Assessment Framework: A Multiscale Assessment Tool*. Technical Reference 6710-1. Bureau of Land Management and Western Association of Fish and Wildlife Agencies, Denver, Colorado.

<sup>7</sup> Connelly, J. M. A. Schroweder, A.R. Sands, and C.E. Braun.2000. Guidelines to manage sage-grouse populations and their habitats. Wildlife Society Bulletin 28 (4): 967-985.

<sup>8</sup> Connelly, J. K. Reese, and M. Schroder. 2003. *Monitoring of Greater sage-grouse habitats and populations*. Station Bulletin 80, Contribution 979. University of Idaho, College of Natural Resources Experiment Station. Moscow, ID.

<sup>9</sup> 10–12 inch precipitation zone; *Artemisia tridentata wyomingensis* is a common big sagebrush sub-species for this type site (Stiver et al, 2015).

<sup>10</sup> ≥12 inch precipitation zone; *Artemisia tridentata vaseyana* is a common big sagebrush sub-species for this type site (Stiver et al, 2015).

**Table 2-6  
Seasonal Habitat Desired Conditions for Greater Sage-grouse**

<b>Attribute</b>	<b>Indicators</b>	<b>Desired Condition</b>
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- <sup>11</sup> Sagebrush plants with a spreading shape provide more protective cover than sagebrush plants that are more tree- or columnar shaped (Stiver et al. 2015).
- <sup>12</sup> Existing land management plan desired conditions for riparian areas/wet meadows (spring seeps) may be used in place of properly functioning conditions, if appropriate for meeting greater sage-grouse habitat requirements.
- <sup>13</sup> Preferred forbs are listed in Table III-2 (Stiver et al. 2015). Overall total forb cover may be greater than that of preferred forb cover since not all forb species are listed as preferred in Table III-2.
- <sup>14</sup> The height of sagebrush remaining above the snow depends upon snow depth in a particular year. Intent is to manage for tall, healthy, sagebrush stands.
- <sup>15</sup> Projects will be designed to provide overhead and lateral concealment of nests on a site specific basis.

**Table 2-2  
Estimated Acres of Treatment Needed within a 10-Year Period to Achieve Vegetation Objectives on BLM-Administered Lands<sup>1</sup>**

<b>Population Area</b>	<b>Mechanical<sup>2</sup></b>	<b>Prescribed Fire (FM-15)<sup>3</sup></b>	<b>Grass Restoration (VEG-2)<sup>4</sup></b>
Bear Lake Plateau	1,000	0	0
East Idaho Uplands	6,000	9,000	1,000
S Central Idaho/N Snake River and Mountain Valleys	18,000	11,000	162,000
Weiser	0	0	13,000
SW Idaho	52,000	10,000	444,000
SW Montana	0	0	0

**Table 2-7  
Treatment Acres per Decade on National Forest System Lands**

<b>Forest</b>	<b>Mechanical<sup>1</sup></b>	<b>Prescribed Fire<sup>2</sup></b>	<b>Grass Restoration<sup>3</sup></b>
Boise	1,000	2,000	0
Caribou-Targhee-Curlew	3,000	2,000	3,000
Salmon-Challis	5,000	1,000	0
Sawtooth	7,000	1,000	7,000
Beaverhead-Deerlodge	0	0	0



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS Information Call

1 message

Beck, Jonathan &lt;jmbeck@blm.gov&gt;

Thu, Apr 23, 2015 at 11:30 AM

To: bcc@co.blaine.id.us, lschoen@co.blaine.id.us, dcrane@cassiacounty.org, timbri.hurst@cassiacounty.org, depperjd@id.doe.gov, dbal@qwestoffice.net, dbal0680@gmail.com, madco@madison.mt.gov, jraymond@co.jefferson.id.us, shrj@juno.com, lcarter@co.bingham.id.us, lmiller@co.fremont.id.us, cowdoc75@hotmail.com, dblocksom@idcounties.org, trice@beaverheadcounty.org, bbreedlove@co.custer.id.us, ripper@mudlake.net, commiss@co.twin-falls.id.us, Jonathan Beck <jmbeck@blm.gov>

Cc: Kurt Wiedenmann <kwiedenmann@blm.gov>, Jeffery Foss <jfoss@blm.gov>, Brent Ralston <bralston@blm.gov>

Bcc: Meredith Zaccherio <meredith.zaccherio@emp.si.com>

County Cooperators: My name is Jonathan Beck and I am the new GRSG project lead for the IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS filling in behind Brent Ralston. As you are aware, the Bureau of Land Management (BLM) is in the midst of an unprecedented land use planning effort. The BLM is preparing 15 Environmental Impact Statements and amending or revising 68 land use plans for the conservation of the Greater Sage-Grouse. We anticipate completing the planning process this summer. As a cooperating agency, the Bureau of Land Management will be providing you an administrative draft of the IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS during the week of April 29 for a two week review.

I am writing to invite you to an informational call on **Tuesday April 28th** to kickoff the cooperator review at **10:00 AM**. I look forward to visiting on the 28th. The call in information is below.

Thanks for you continued interested. Jon

The Call In number is: 866-916-4861

The Passcode is: 4369869#

Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

**Re: ID & SW MT GRSG FEIS Comments**

1 message

Beck, Jonathan &lt;jmbeck@blm.gov&gt;

Mon, Jun 15, 2015 at 7:23 AM

To: "SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/AFCEC/CZPW" &lt;robert.shirley.2@us.af.mil&gt;

Cc: Jonathan Beck &lt;jmbeck@blm.gov&gt;

Bob, sorry it took me so long to respond, I just carved out some time for email. We didn't produce a formal response to cooperating agency review. We reviewed the letters and considered comments, but didn't respond in a formal way. Jon

On Mon, Jun 8, 2015 at 3:54 PM, SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/AFCEC/CZPW <robert.shirley.2@us.af.mil> wrote:

Mr. Beck,

Did BLM generate a response to comments table or equivalent type document which details the BLM responses to DoD cooperating agency comments on the Administrative Draft?

v/r

Bob Shirley

//SIGNED//

Robert M. Shirley, DAF

DoD Regional Environmental Coordinator, Region 10

AF Western Regional Environmental Office, San Francisco

(415)977-8846

—Original Message—

From: SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/SAF/IEE REO-W

Sent: Wednesday, May 13, 2015 6:42 PM

To: 'jmbeck@blm.gov'

Cc: Huber, Michael J CIV USN COMNAVREG SW (US) (michael.huber@navy.mil);

Mahoney, Mark A CIV USARMY HQDA ASA IEE (US) (mark.a.mahoney.civ@mail.mil)

Subject: RE: ID &amp; SW MT GRSG FEIS Comments

Mr. Beck,

Attached are DoD comments on the BLM Administrative Draft for the Greater Sage-Grouse Proposed Plan Amendment/Final Environmental Impact Statement (FEIS) for the Idaho and Southwest Montana Sub-Region submitted in accordance with the Memorandum of Understanding between DoD and BLM establishing DoD as a Cooperating Agency.

The comments include a request to add language similar to text included in the Nevada and NE California Greater Sage-Grouse Proposed LUPA/Final EIS stating the BLM does not have the authority to regulate aircraft activities that are under the jurisdiction of the Federal Aviation Administration and the Department of Defense, and requests for exemption for projects which have military and national security requirements.

Due to the size of the document and abbreviated document review time line it is possible that additional DoD comments may be received which will be

immediately forwarded for BLM consideration.

Thank you very much for the opportunity to review and comment on the document. If you have any questions, please let me know.

//SIGNED//

Robert M. Shirley, DAF  
DoD Regional Environmental Coordinator, Region 10  
AF Western Regional Environmental Office, San Francisco  
(415 )977-8846

—  
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Comment reference 6500 (ID-931)**

1 message

Kerry McMurray &lt;kerrym@cassiacounty.org&gt;

Tue, May 26, 2015 at 3:09 PM

To: jmbeck@blm.gov

Cc: Dennis Crane &lt;dcrane@cassiacounty.org&gt;

Mr. Beck: Please find attached the comment letter from the Board of Cassia County Commissioners. Realizing it is late, we ask still that you consider this in your review as the original allotted time for review was very short. Thank you for any consideration you could give.

*Kerry D. McMurray*

Cassia County Administrator &  
Attorney and Counselor- at-Law  
Cassia County Courthouse  
1459 Overland Avenue  
Burley, Idaho 83318

Office: (208) 878-7302

Fax: (208) 878-3510

Email: [kerrym@cassiacounty.org](mailto:kerrym@cassiacounty.org)

Idaho Southwest Montana Sage Grouse 052615.doc  
168K



## COUNTY OF CASSIA

OFFICE OF THE BOARD OF COUNTY COMMISSIONERS

**Dennis D. Crane**, *Chairman*  
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**Robert "Bob" Kunau**, *Commissioner*

**COURTHOUSE**  
1459 Overland Avenue  
BURLEY, IDAHO 83318

Phone: 208-878-7302  
Fax: 208-878-9109  
[www.cassiacyounty.org](http://www.cassiacyounty.org)

May 26, 2015

Mr. Jonathan Beck  
BLM Project Manager for the Greater  
Sage-Grouse LLUP Amendments,  
Idaho Southwest Montana Sub-Region

Via email only to: [jmbeck@blm.gov](mailto:jmbeck@blm.gov)

Reference 6500 (ID-931)

To Whom It May Concern:

The administrative draft environmental impact statement, currently open for agency and cooperating entity comment, includes provisions that will potentially result in devastating impacts to livestock operations reliant on early season grazing. These include a requirement that livestock allotments maintain a seven inch (7") stubble height up to and through June 15 of each year.

Those of us who are familiar with rangeland ecosystems know that in our arid environment, seven inches (7") of grass may be an entire year's production for any given low elevation grazing scenario. In these areas, this action may result in the elimination of grazing for entire allotments, thereby creating significant economic impacts to our local ranching families and the local economy.

Given that wildfire has been recognized as the single greatest detriment to sage grouse habitat, it is surprising that the agency would propose an action that could eliminate an important tool in reducing the fuel loads that feed wildfires.

Cheatgrass (Downy Brome), commonly considered an invasive plant species responsible for rapid wildfires, exists predominately on these lower elevation rangelands where early spring grazing occurs. Cheatgrass is a "cool season" grass, meaning that it greens up early and also matures early which is why it is also known as "Junegrass". Reducing and/or eliminating the grazing of cheatgrass will undoubtedly lead to greater risk of wildfires, and further loss of sage grouse habitat.

BOARD OF COMMISSIONERS  
FOR CASSIA COUNTY, IDAHO  
/s/ Dennis D. Crane  
Chairman



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

## Fwd: Subject:Idaho/Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment and Environmental Impact Statement

1 message

Schmidt, Barbara &lt;barbara\_schmidt@fws.gov&gt;

Fri, Jun 12, 2015 at 8:50 AM

To: Katharine Crane &lt;kfcrane@blm.gov&gt;, Brandon Knapton &lt;bknapton@blm.gov&gt;

Cc: Jonathan Beck &lt;jmbeck@blm.gov&gt;, Scott Hoefer &lt;shoefer@blm.gov&gt;, Mark Robertson &lt;mark\_robertson@fws.gov&gt;

Hi, Kate and Brandon. Attached is the signed Letter of Concurrence for the greater sage-grouse Land Use Plan Amendment (LUPA) for Idaho and Southwestern Montana for the Twin Falls and Boise District Level 1 Teams' information.

You may notice that proposed species and proposed critical habitat are addressed differently in this Letter of Concurrence than how IFWO has addressed programmatic and project specific actions within our Level 1 Teams. The LUPA Assessment made "non-jeopardy" or "no destruction or adverse modification" determinations for proposed species and proposed critical habitat rather than the "NLAA" or "LAA" effects determinations that our BLM Boise and Twin Falls District Level 1 Teams typically make on projects and plans. When a Federal action agency makes a "non-jeopardy" or "no destruction or adverse modification" determination for proposed species or proposed critical habitat, the Service may concur with the determinations, but conference is not required; therefore, no Conference Report or Conference Opinion is provided.

The bottom line is that BLM may choose to make "non-jeopardy" or "no destruction or adverse modification" determinations for proposed species and proposed critical habitat rather than the "NLAA" or "LAA" effects determinations. However, the Service has encouraged our Level 1 Teams to make "NLAA" or "LAA" effect determinations for proposed species and proposed critical habitat on BLM local projects and plans. These effects determinations allow for relatively seamless conversion of a Conference Report or Conference Opinion to a Letter of Concurrence or Biological Opinion, provided that no significant changes in the action that could warrant a reanalysis of effects has occurred between the original conference and the listing of a species or the designation of critical habitat. Conference allows for more efficient and effective progression of local projects and plans through the section 7 process over the long-term.

Let me know if you have questions. Have a great weekend! Barb

Barbara Schmidt  
US Fish and Wildlife Service  
1387 South Vinnell Way, Room 368  
Boise, Idaho 83709  
208-378-5259  
<http://www.fws.gov/idaho/>

The mission of the U.S. Fish and Wildlife Service is working with others to conserve, protect and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.

—— Forwarded message ——

From: Wanstrom, Carol &lt;carol\_wanstrom@fws.gov&gt;

Date: Thu, Jun 11, 2015 at 3:44 PM

Subject: Subject:Idaho/Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment and Environmental Impact Statement

To: Timothy Murphy <tmurphy@blm.gov>, Schmid David E <dschmid@fs.fed.us>, nrasure@fs.fed.us, Paul Makela <pmakela@blm.gov>, Scott Hoefer <shoefer@blm.gov>, Kim Tripp <ktripp@blm.gov>, gstein@fs.fed.us, Evan Ohr <evan\_ohr@fws.gov>, Sandi Fisher <sandi\_fisher@fws.gov>, Jodi Bush <jodi\_bush@fws.gov>, Kathleen Hendricks <kathleen\_hendricks@fws.gov>, Larry Crist <larry\_crist@fws.gov>, Doug Laye <doug\_laye@fws.gov>, Pat Deibert <pat\_deibert@fws.gov>, Jeff Berglund



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Attached is the Fish and Wildlife Service's correspondence regarding the Idaho/Southwestern Montana Sage Grouse Land Use Plan Amendment and Environmental Impact Statement.. A hard copy of the letter will be mailed to Tim Murphy, the State Director of the Bureau of Land Management in Idaho, and to Regional Forester David Schmid, U.S. Forest Service, Region 1 and Regional Forester Nora Rasure, U.S. Forest Service Region 4.. If anyone else would like a paper copy of this correspondence mailed to you please contact me at (208) 378-5388.

Carol Wanstrom  
Idaho Fish and Wildlife Office  
1387 South Vinnell Way, Suite 368  
Boise, ID 83709  
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**Idaho Southwestern Montana Greater Sage Grouse LUP Amendment.pdf**  
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United States Department of the Interior  
U.S. Fish and Wildlife Service  
Idaho Fish and Wildlife Office

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JUN 11 2015

Memorandum

To: State Director, Idaho State Office, U.S. Bureau of Land Management, Boise, Idaho  
Regional Forester, Region 1, U.S. Forest Service, Missoula, Montana  
Regional Forester, Region 4, U.S. Forest Service, Ogden, Utah

From: *Acting* State Supervisor, Idaho Fish and Wildlife Office, U.S. Fish and Wildlife Service, Boise, Idaho *Deir Mackey*

Subject: Idaho/Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment and Environmental Impact Statement—Multiple Counties in Idaho and Southwestern Montana and Box Elder County, Utah—Concurrence  
In Reply Refer To: 01EIFW00-2015-I-0502

This memorandum transmits the U.S. Fish and Wildlife Service's (Service) concurrence on the effects to species listed under the Endangered Species Act (Act) of 1973, as amended, from actions associated with the U.S. Bureau of Land Management's (Bureau) and U.S. Forest Service's (USFS) (collectively referred to as the action agencies) proposed Idaho/Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment and Environmental Impact Statement (LUPA) which encompasses multiple counties in Idaho and Southwestern Montana<sup>1</sup> and Box Elder County, Utah. In a letter dated May 8, 2015, and received by the Service on May 12, the action agencies requested concurrence<sup>2</sup> with the determination, documented in the Biological Assessment (Assessment; USBLM and USFS 2015, entire), that implementation of the proposed LUPA may affect, and is not likely to adversely affect the grizzly bear (*Ursus arctos horribilis*) and *Spiranthes diluvialis* (Ute ladies'-tresses), both threatened species under the Endangered Species Act of 1973 (Act), as amended.

In addition, pursuant to the requirements of 7(a)(4) of the Act and CFR 402.10, the action agencies assessed the effects of the proposed actions and made non-jeopardy determinations for the proposed LUPA. The action agencies determined that the LUPA is not likely to jeopardize the continued existence of *Lepidium papilliferum* (slickspot peppergrass), a species currently proposed for listing as Endangered under the Act. The Bureau and USFS also determined that

<sup>1</sup> The LUPA planning area includes Ada, Blaine, Cassia, Camas, Canyon, Elmore, Gem, Gooding, Jerome, Lincoln, Minidoka, Oneida, Owyhee, Power, and Twin Falls counties in Idaho, and Beaverhead, Broadwater, Deer Lodge, Gallatin, Granite, Jefferson, Lewis & Clark, Madison, Park, Powell, and Silver Bow counties in southwestern Montana.

<sup>2</sup> Although the Bureau's memorandum was transmitted under Bureau letterhead and signature, the Bureau specifically stated that this request was also on behalf of the USFS.

the proposed LUPA is not likely to result in the destruction or adverse modification of proposed critical habitat for the slickspot peppergrass and the western yellow-billed cuckoo (*Coccyzus americanus*). Though Director (Service) concurrence is not required by 7(a)(4) or CFR 402.10, the inclusion of these determinations in the Assessment creates a need under CFR 402.12(k) for the Service's concurrence with these determinations. After reviewing the action agencies' Assessment, the Service concurs with these determinations, and pursuant to language at CFR 402.12(k), a conference is not required.

The action agencies also determined that implementation of the LUPA will have no effect on the Canada lynx (*Lynx canadensis*) and its designated critical habitat, the northern Idaho ground squirrel (*Spermophilus brunneus brunneus*), the red knot (*Calidris canutus rufa*), the western yellow-billed cuckoo, the bull trout (*Salvelinus confluentus*) and its designated critical habitat, the Banbury Springs lanx (*Lanx* spp.), the Bliss Rapids snail (*Taylorconcha serpenticola*), the Bruneau hot springsnail (*Pyrgulopsis bruneauensis*), and the Snake River physa (*Physa natricina*). The Service acknowledges these no effect determinations.

## Project Overview

The Bureau and USFS prepared amendments to their respective land use plans (LUPs) in response to the need to inform the Service's March 2010 "warranted, but precluded" listing decision for the greater sage-grouse (*Centrocercus urophasianus*, GRSG). These documents provide direction for the conservation of GRSG, and analyze the environmental effects that could result from implementing the proposed LUPA. There are two selected actions, one for the Bureau and one for the USFS. Overall, the two plans are the same, with some minor differences between the plans primarily due to agency land management planning terminology. Full details of the Bureau and the USFS proposed LUPA are provided in the Assessment (USBLM and USFS 2015, Appendices D and E).

The LUPA addresses GRSG habitat within Idaho, southwestern Montana, and that portion of the Sawtooth National Forest located within Box Elder County, Utah. The LUPA covers Bureau-administered lands in the Bruneau, Burley, Challis, Four Rivers, Jarbidge, Owyhee, Pocatello, Salmon, Shoshone, and Upper Snake Field Offices in Idaho and the Butte<sup>3</sup> and Dillon Field Offices in Montana. The LUPA covers National Forest System lands in the Boise, Caribou-Targhee, Salmon-Challis National Forests, and Curlew National Grassland in Idaho, the Beaverhead-Deerlodge National Forest in Montana, and that portion of the Sawtooth National Forest located in Utah. The Proposed LUPA focuses on addressing public comments and comments from the States of Idaho and Montana, while continuing to meet Bureau and USFS legal and regulatory mandates (USBLM and USFS 2015, pp. 7-8).

The purpose of the LUPA is to identify and incorporate appropriate conservation measures in LUPs to conserve, enhance, or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat. The Assessment further states that changes in action agency management

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<sup>3</sup> Butte Field Office-administered lands are not included as part of the analysis in the LUPA/EIS except as required in the GRSG cumulative effects analysis. For additional information, please see Chapter 1 of the Final Environmental Impact Statement for the LUPA.

of GRSG habitats are anticipated to have considerable benefits to present and future GRSG populations, and could reduce the need to list the GRSG as threatened or endangered under the Act (USBLM and USFS 2015, p. 8). The proposed LUPA incorporates the following GRSG goal: Conserve, enhance, and restore the sagebrush ecosystem upon which GRSG populations depend in an effort to maintain and/or increase their abundance and distribution, in cooperation with other conservation partners. GRSG habitat in Idaho is divided into three categories, listed here in order of higher to lower conservation value to GRSG: Priority Habitat Management Areas (PHMA), Important Habitat Management Areas (IHMA), and General Habitat Management Areas (GHMA). Only PHMA and GHMA are identified for GRSG in the southwestern Montana portion of this action (USBLM and USFS 2015, pp. 12-13).

The proposed action, a decision on direction for the conservation of the GRSG, is unlike a typical project in that it does not set in motion specific on the ground, environment-impacting activities. However since the LUPA does represent a final agency action, the Bureau and the USFS have reviewed the general nature of impacts that could potentially occur from the LUPA, including how they potentially affect listed species. At the LUP level, there is only sufficient information to generally evaluate the potential impacts of the LUPA on species protected under the Act and the circumstances or planning and operation constraints that may reduce those potential impacts. The same analytical constraints apply to the Assessment and to this Letter of Concurrence, especially since the LUPA does not specifically act as the decision document for site-specific future projects.

Programmatic plans are considered permissive in that they allow but do not authorize or approve any site-specific projects or actions. They are much like zoning ordinances under which future decisions are made. Decisions at the LUP level establish goals and objectives, identify the types of activities that are allowed or prohibited in specific areas, may specify management standards and minimum habitat condition goals either unit wide or for specific areas, and may establish a monitoring and evaluation program. The Assessment does not analyze site-specific actions, and specifically states that effects determinations should not be assumed to relate to site-specific projects. In the future, during project-level environmental planning and analysis, site-specific actions will continue to be analyzed to identify possible effects on listed species. Site-specific analysis of such actions may identify potential effects on listed species even when the programmatic Assessment determines no effect associated with GRSG management direction for LUP programs. As part of any future project-level environmental analysis, specific conservation measures and strategies to alleviate any potential adverse effects associated with GRSG management direction may be developed as the details of the future site-specific proposed actions become available (USBLM and USFS 2015, pp. 100-101).

The LUPA Assessment, associated section 7 consultation activities, and this Letter of Concurrence do not change the responsibility of the Bureau and the USFS to consult on site-specific projects as they are developed in the future. Even if those future actions are consistent with the LUPA, if those actions may affect any listed species, the Bureau and USFS bear the responsibility to consult with the Service under section 7 of the Act to ensure that their actions are not likely to jeopardize those species or adversely modify designated critical habitat.

This consultation on GRSB management and its LUPA direction is to be considered in the context of already existing LUPs and any consultations on those previous LUPs. This consultation does not substitute or replace any previous consultation on existing LUPs. The action agency's effects determinations and the Service concurrence have been made with this context in mind. The Service recommends that a copy of this memorandum be retained in agency overall LUP files with previously completed LUP consultations for future reference and to document that section 7 compliance for individual LUPs under the Act is complete.

## **Basis for Service Concurrence by Species**

The Bureau and USFS have determined, and the Service concurs, that the LUPA may affect, but is not likely to adversely affect two threatened species (the grizzly bear and the Ute ladies'-tresses). Service concurrence with Bureau and USFS determinations of effect for these listed species is based on the rationales highlighted below. In addition, the Bureau and USFS have determined, and the Service concurs, that the LUPA is not likely to jeopardize the continued existence of one species proposed for listing (the slickspot peppergrass) and will not destroy or adversely modify critical habitat proposed for two species (the slickspot peppergrass and the yellow-billed cuckoo) within some LUP units.

### **Grizzly Bear**

The Bureau and USFS determined that the LUPA decision and associated actions occurring on the Bureau's Bruneau, Burley, Challis, Jarbidge, Owyhee, Pocatello, Salmon, Shoshone, and Four Rivers Field Offices; the USFS's Boise, Salmon-Challis, or Sawtooth National Forests; and the USFS's Curlew National Grassland will have no effect on the grizzly bear because these field offices and national forests/grassland do not contain occupied habitat for grizzly bears. The Service acknowledges these no effect determinations for the grizzly bear.

Service concurrence with the determination that the LUPA may affect, but is not likely to adversely affect the grizzly bear within the Bureau's Upper Snake and Dillon Field Offices and the USFS's Beaverhead-Deerlodge and Caribou-Targhee National Forests, is based on the following rationales.

- Overall, a total of 173,581 acres of occupied grizzly bear habitat overlap with PHMA, 116,465 acres overlap with IHMA, and 81,673 acres of GHMA within the LUPA area (compiled from USBLM and USFS 2015, pp. 47, 50, 63, 69).
- GRSB LUPA decision goals, objectives, desired conditions, standards, and guidelines that could have any bearing on the major threats to grizzly bears—secure habitat, developed sites, food storage, livestock grazing, and four key food sources<sup>4</sup>—are expected to be neutral, result in beneficial effects, or minimal negative impacts. For example:

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<sup>4</sup> Four seasonal foods have been identified as being important to the grizzly bear population: winter killed ungulates, spawning cutthroat trout, seeds of whitebark pine, and alpine moth aggregation sites. The LUPA action area has no overlap with habitats supporting these four seasonal foods (USBLM and USFS 2015, p. 87).

- Fuels treatments, habitat restoration, and vegetation management treatments in GRSG HMAs will maintain, improve, or restore sagebrush habitat, benefitting all species that use sagebrush habitat, including grizzly bears.
- For recreation and travel management and lands and realty and infrastructure management programs, the GRSG LUPA decision will not authorize new roads. Rather, it will limit new road construction and existing road use, which could benefit grizzly bears by increasing the available amount of secure habitat.
- There is the potential for some negative effects on listed species from direction provided within the LUPA. For example, fuels treatments using targeted grazing or plant species used for seeding proposed within occupied grizzly bear habitat have the potential to negatively impact grizzly bears. In addition, prohibiting construction of new recreation facilities or infrastructure within GRSG PHMA and IHMA could push the construction of developed sites into preferred grizzly habitat. However, site-specific analyses will determine the scope and scale of any likely impacts that may occur associated with project-level activities. Furthermore, significant effects from these site-specific projects will be highly unlikely due to avoidance or other mitigations based on current laws, agency regulations, and other conservation measures in place to protect the grizzly bear. Any possible effects from future proposed actions will be addressed in site-specific analysis at the project level when reasonably certain, explicit actions are identified and proposed. Therefore, potential effects of site-specific projects proposed under LUPA programs that may affect the grizzly bear are expected to be reduced to insignificant or discountable levels.

### **Ute ladies'-tresses**

The Bureau and USFS determined that the Idaho-Southwestern Montana LUPA decision and associated actions occurring on the Bureau's Bruneau, Burley, Challis, Four Rivers, Jarbidge, Owyhee, Salmon, and Shoshone Field Offices; the USFS's Boise and Beaverhead-Deerlodge National Forests; and the USFS's Curlew National Grassland will have no effect on the Ute ladies'-tresses as suitable habitat for the Ute ladies'-tresses is not suspected to occur in these field offices and national forests/grassland. The Service acknowledges these no effect determinations for the Ute ladies'-tresses.

Service concurrence with determination that the LUPA may affect, but is not likely to adversely affect, the Ute ladies'-tresses within the Bureau's Dillon, Pocatello, and Upper Snake Field Offices and within the USFS's Caribou-Targhee, Salmon-Challis, and Sawtooth National Forests, is based on the following rationales.

- There is no overlap between known Ute ladies'-tresses locations and GRSG HMAs. The closest known Ute ladies'-tresses location is over 0.6 mile from the IHMA located in Fremont County, Idaho.
- The areas most likely to support Ute ladies'-tresses populations (riparian areas along major river drainages) have mostly been excluded from GRSG HMAs. However, it is likely that suitable habitat for Ute ladies'-tresses is located within GRSG HMAs due to the inclusion of some wetland habitats.

- Because the proposed LUPA does not propose any specific ground-disturbing actions, no direct negative effects on Ute ladies'-tresses will occur from the LUPA action.
- Where travel management planning has not been completed or is in progress, and listed plant habitats are present, there may be a reduction of impacts from off-road vehicle use (BLM TM-1) in areas where Ute ladies'-tresses overlap with GRSG HMAs (pp. 102, 140). Restrictions for off-road vehicle use may provide a beneficial effect on listed plant species by reducing impacts from off road vehicle activities (plants crushed by tires). Thus, if any areas of occupied or suitable habitat for Ute ladies'-tresses within GRSG HMAs are currently open to off-road vehicle use, restrictions will be placed on vehicles to use only existing routes. This would provide a small and contemporaneous beneficial effect on Ute ladies'-tresses by reducing the likelihood of damage to Ute ladies'-tresses or its habitat from off-road vehicles.
- Proposed retrofitting of existing towers and structures consistent with required design features (RDFs) in the GRSG HMAs (BLM LR-12) to benefit GRSG has the potential to impact listed plants, including the Ute ladies'-tresses, if the plants are present in the right-of-way (ROW) corridors where retrofit activities are needed. Potential crushing of vegetation, including Ute ladies'-tresses, could occur due to parking vehicles off roads near each tower as well as foot traffic near the towers during retrofit activities. However, because towers, structures, and their access roads generally avoid riparian habitats, the Ute ladies'-tresses is not likely to be present on or directly adjacent to ROW roads or near existing towers. Therefore, potential effects of LUPA-related retrofitting of towers and structures on the Ute ladies'-tresses are extremely unlikely to occur, and therefore, are discountable.
- Although there is the potential for some negative effects on listed species from additional proposed actions associated with LUPA direction, significant effects will be highly unlikely due to avoidance or other mitigations based on current laws, agency regulations, and other conservation measures currently in place to protect listed plants. Any possible effects from future proposed actions will be addressed in site-specific analysis at the project level when reasonably certain, explicit actions are identified and proposed. Therefore, potential effects of site-specific projects proposed under LUPA programs that may affect the Ute ladies'-tresses are expected to be reduced to insignificant or discountable levels.

### **Slickspot Peppergrass**

The Bureau and USFS determined that the LUPA decision and associated actions occurring on the Bureau's Bruneau, Burley, Challis, Dillon, Owyhee, Pocatello, Salmon, Shoshone, or Upper Snake Field Offices, the USFS's Boise, Beaverhead-Deerlodge, Caribou-Targhee, Salmon-Challis, or Sawtooth National Forests, or the USFS's Curlew National Grassland will have no effect on the slickspot peppergrass as these field offices and national forests/grassland are not suspected to contain suitable habitats for the slickspot peppergrass. The Service acknowledges these no effect determinations for the slickspot peppergrass.

After reviewing the Bureau and USFS Assessment, the Service concurs with the Bureau and USFS determination that the LUPA is not likely to jeopardize the continued existence of the

slickspot peppergrass within the Bureau's Four Rivers and Jarbidge Field Offices. As described above, pursuant to language at CFR 402.12(k), conference is not required for this Federal action agency non-jeopardy determination.

### **Proposed Critical Habitat for the Slickspot Peppergrass**

The Bureau and USFS determined that the LUPA decision and associated actions occurring on the Bureau's Bruneau, Burley, Challis, Dillon, Owyhee, Pocatello, Salmon, Shoshone, and Upper Snake Field Offices; the USFS's Boise, Beaverhead-Deerlodge, Caribou-Targhee, Salmon-Challis, and Sawtooth National Forests; and the USFS's Curlew National Grassland will have no effect on proposed critical habitat for the slickspot peppergrass as these field offices and national forests/grassland do not contain proposed critical habitat for the species. The Service acknowledges these no effect determinations for slickspot peppergrass proposed critical habitat.

After reviewing the Bureau and USFS Assessment, the Service concurs with the Bureau and USFS determination that the LUPA is not likely to destroy or adversely modify proposed critical habitat for the slickspot peppergrass within the Bureau's Four Rivers and Jarbidge Field Offices. As described above, pursuant to language at CFR 402.12(k), conference is not required for this Federal action agency no destruction or adverse modification determination.

### **Proposed Critical Habitat for the Yellow-billed Cuckoo**

The Bureau and USFS determined that the LUPA decision and associated actions occurring on the Bureau's Bruneau, Burley, Challis, Dillon, Four Rivers, Jarbidge, Owyhee, Pocatello, Salmon, and Upper Snake Field Offices, the USFS's Boise, Caribou-Targhee, Salmon-Challis, Sawtooth, and Beaverhead-Deerlodge National Forests, and the USFS's Curlew National Grassland will have no effect on the proposed critical habitat for the western yellow-billed cuckoo because these field offices and national forests/grassland do not contain western yellow-billed cuckoo proposed critical habitat that overlaps with LUPA actions. The Service acknowledges these no effect determinations for western yellow-billed cuckoo proposed critical habitat.

After reviewing the Bureau and USFS Assessment, the Service concurs with the Bureau and USFS determination that the LUPA is not likely to destroy or adversely modify proposed critical habitat for the yellow-billed cuckoo within the Bureau's Shoshone Field Office. As described above, pursuant to language at CFR 402.12(k), conference is not required for this Federal action agency no destruction or adverse modification determination.

### **Conclusion**

This concludes informal consultation on the proposed LUPA with the Bureau and the USFS under section 7 of the Act. Reinitiation of consultation on this action may be necessary if new information reveals effects of the action that may affect listed species or designated habitat in a manner or to an extent not considered in the assessment, the action is subsequently modified in a manner that causes an effect to listed species that was not considered in the analysis, or a new species is listed or critical habitat is designated that may be affected by the proposed action (CFR 402.16).



Thank you for your continued interest in threatened and endangered species conservation. Please contact Barbara Schmidt of my staff at (208) 378-5259 if you require additional information regarding this memorandum.

cc: BLM ISO, Boise (Hoefler, Makela)  
BLM, WO, Washington (Tripp)  
USFS, Caribou Targhee National Forest, Pocatello (Colt)  
USFS, Ogden, UT (Stein)  
FWS, EIFO, Chubbuck (Ohr, Fisher)  
FWS, WFWO, Helena, MT (Bush)  
FWS, IFWO, Boise (Hendricks)  
FWS, UFWO, West Valley City, UT (Crist)  
FWS, Region 1, Portland (Brown)  
FWS, Region 6, Denver (Laye)  
FWS, Region 6, Cheyenne (Deibert)

## References Cited

- U.S. Bureau of Land Management and U.S. Forest Service (USBLM and USFS). 2015. Biological Assessment for the Idaho/Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment and Environmental Impact Statement. May 11, 2015. Idaho State Office, Bureau of Land Management, Boise, Idaho. 140 pp. + appendices.
- U.S. Bureau of Land Management and U.S. Fish and Wildlife Service (USBLM and USFWS). 2014. Conservation agreement for Idaho Bureau of Land Management existing land use plans. Agreement to provide land use plan level conservation measures for slickspot peppergrass for all applicable existing Idaho Bureau of Land Management land use plans signed September 15, 2014. 8 pp. + appendices.
- U.S. Fish and Wildlife Service (USFWS). 2009. Biological Opinion for the Jarbidge Resource Management Plan, Kuna Management Framework Plan, Cascade Resource Management Plan, and Snake River Birds of Prey National Conservation Area Resource Management Plan for the Bureau of Land Management, Idaho. Tracking Number 14420-2010-F-0019. 57 pp. + appendices. Document available on-line at: [http://www.fws.gov/idaho/publications/BOs/0019\\_BLMLEPA\\_2010.PDF](http://www.fws.gov/idaho/publications/BOs/0019_BLMLEPA_2010.PDF) (last accessed May 26, 2015).



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Admin Draft Review - Greater Sage-grouse

1 message

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Bond, Jennifer <jebond@mt.gov> Wed, May 13, 2015 at 12:25 PM  
To: "mbloom@blm.gov" <mbloom@blm.gov>, "csherveb@blm.gov" <csherveb@blm.gov>, "brian\_hockett@blm.gov" <brian\_hockett@blm.gov>, "jmbeck@blm.gov" <jmbeck@blm.gov>, "acarr@blm.gov" <acarr@blm.gov>  
Cc: "Hagener, Jeff" <JHagener@mt.gov>, "McDonald, Ken" <kmcdonald@mt.gov>, "Bertellotti, Gary" <GBertellotti@mt.gov>, "Schmitz, Brad" <brschmitz@mt.gov>, "Flowers, Tom" <TFlowers@mt.gov>, "Sheppard, Sam" <SSheppard@mt.gov>, "Hammond, Gary" <ghammond@mt.gov>, "Wightman, Catherine" <CWightman@mt.gov>

Good afternoon,

Attached are the comments from Montana Fish, Wildlife and Parks for the BLM Administrative Draft Greater Sage-grouse Proposed Resource Management Plan Amendment/Final Environmental Impact Statement.

You will also receive a hard copy of the in the mail.

Thank you,

**Jennifer Bond**

Administrative Support Supervisor

Montana Fish, Wildlife and Parks

Director's Office

(406) 444-9089

[jebond@mt.gov](mailto:jebond@mt.gov)

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## Montana Fish, Wildlife & Parks

PO Box 200701  
Helena, MT 59620-0701  
406-444-3186  
FAX: 406-444-4952  
Ref: DO 132-15

May 13, 2015

Dear BLM Project Managers:

Montana Fish, Wildlife and Parks, a Cooperating Agency with the BLM, has received electronic copies of the Administrative Draft Greater Sage-grouse Proposed Resource Management Plan Amendment/Final Environmental Impact Statement (FEIS) or Administrative Draft Proposed Resource Management Plan/Final Environmental Impact Statement (FEIS) for each of the field offices within the range of sage-grouse in Montana. This letter pertains to management decisions related to Greater Sage-grouse. FWP Regional Offices may provide additional comments on other aspects of Resource Management Plan revisions separately.

We have limited our review to the first section of Chapter 2 that details the changes between the Draft and Final EIS because of the limited time provided for review. The BLM's landscape-scale approach that prioritizes conservation action in the most important landscapes (e.g., Core Areas) yet honors valid and existing rights is consistent with Montana's Sage-grouse Habitat Conservation Program – Executive Order 10-2014. The BLM objectives of minimizing new or additional surface disturbance and improving habitat conditions directly align with Montana's program. We are supportive of the BLM's intent to maintain a surface disturbance limit of 3% in the absence of a Montana state program, but to adjust that limit to 5% to be consistent with the state program when the state program becomes fully functional. This consistency among regulatory processes will be easier to communicate with the public and will ultimately provide greater benefits to sage-grouse.

Thank you for the opportunity to review the Administrative Draft. Montana Fish, Wildlife and Parks looks forward to continuing to work with the BLM on implementation of the Resource Management Plans and Greater Sage-grouse conservation efforts.

Sincerely,

A handwritten signature in blue ink that reads "Paul C. Sihler". The signature is written in a cursive, flowing style.

Paul Sihler  
Chief of Field Operations

CC: Jeff Hagener, Ken McDonald, Gary Bertellotti, Brad Schmitz, Tom Flowers, Sam Sheppard, Gary Hammond, Catherine Wightman



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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## Brief Update

1 message

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Brent Ralston <bralston@blm.gov> Tue, Nov 18, 2014 at 4:14 PM  
To: Angenie McCleary <bcc@co.blaine.id.us>, Bob Shirley <robert.shirley.2@us.af.mil>, Dan Blocksom <dblocksom@idcounties.org>, Dennis Crane <dcrane@cassiacounty.org>, Dennis Crane <timbri.hurst@cassiacounty.org>, depperjd@id.doe.gov, dmlamb01@gmail.com, Douglas Balfour <dbal@qwestoffice.net>, Douglas Balfour <dbal0680@gmail.com>, "Happel, Dan" <dhappel@madison.mt.gov>, James Hart <madco@madison.mt.gov>, Jerald Raymond <jraymond@co.jefferson.id.us>, Jerry Hoagland <shrj@juno.com>, Ladd Carter <lcarter@co.bingham.id.us>, Lawrence Schoen <lschoen@co.blaine.id.us>, Lee Miller <lmliller@co.fremont.id.us>, Meredith Zaccherio <meredith.zaccherio@emp.si.com>, "Mickelsen, Robert" <rmickelsen@fs.fed.us>, OCNRC DIR@aol.com, Robert Cope <cowdoc75@hotmail.com>, Terry Kramer <tkramer@co.twin-falls.id.us>, Thoms Rice <trice@beaverheadcounty.org>, Todd\_Stefanic@nps.gov, Wayne Butts <bbreedlove@co.custer.id.us>, William Frederiksen <ripper@mudlake.net>  
Bcc: jmbeck@blm.gov

Well, you haven't missed any correspondence from me, just in case you've had that thought. We are still in a holding pattern awaiting some final issue resolution at the national level. There are ongoing meetings between FWS and BLM/Forest Service and we should be hearing something soon. Sorry I don't have more to share at this point. Once we have more definitive direction in hand and a better grasp on the upcoming schedule then I'll get a call scheduled for us.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**RE: BLM ID & NW MT GRSG RMP/EIS Proposed Plan**

1 message

Brent Ralston &lt;bralston@blm.gov&gt;

Tue, Mar 3, 2015 at 9:01 PM

To: "SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/SAF/IEE REO-W" &lt;robert.shirley.2@us.af.mil&gt;

Cc: Jonathan Beck &lt;jmbeck@blm.gov&gt;

Bob,

The last several months had seen significant coordination efforts at the national level with all of the western states and USFWS, which we locally have only been peripherally involved. The results of these efforts are currently being stepped out to the sub-regional efforts and there should be some updates to the schedule and remaining process soon. We don't currently have all of that worked out and there have not been any updates on the web or communicated to our cooperators in the last several months.

Thanks for maintaining your interest and there should be some information to share soon.

Brent Ralston  
Special Projects Lead  
Jarbidge & Owyhee Grazing Permit Process  
208-373-3812

-----Original Message-----

From: SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/SAF/IEE REO-W  
[mailto:[robert.shirley.2@us.af.mil](mailto:robert.shirley.2@us.af.mil)]  
Sent: Tuesday, March 03, 2015 6:36 PM  
To: Brent Ralston  
Subject: BLM ID & NW MT GRSG RMP/EIS Proposed Plan

Brent,

I have not seen any activity or received any e-mails for quite some time on the BLM RMP/EIS for GRSG. I checked the BLM webpage and it did not look like there was anything new there.

Any updates on status or schedule available?

//SIGNED//

Robert M. Shirley, DAF  
DoD Regional Environmental Coordinator, Region 10 AF Western Regional  
Environmental Office, San Francisco  
(415)977-8846

-----Original Message-----

From: Brent Ralston [mailto:[bralston@blm.gov](mailto:bralston@blm.gov)]  
Sent: Tuesday, November 18, 2014 3:14 PM  
To: Angenie McCleary; SHIRLEY, ROBERT M GS-14 USAF HAF AFCEC/SAF/IEE REO-W;  
Dan Blocksom; Dennis Crane; Dennis Crane; [depperjd@id.doe.gov](mailto:depperjd@id.doe.gov);  
[dmlamb01@gmail.com](mailto:dmlamb01@gmail.com); Douglas Balfour; Douglas Balfour; Happel, Dan; James  
Hart; Jerald Raymond; Jerry Hoagland; Ladd Carter; Lawrence Schoen; Lee  
Miller; Meredith Zaccherio; Mickelsen, Robert; [OCNRCDIR@aol.com](mailto:OCNRCDIR@aol.com); Robert

Cope; Terry Kramer; Thoms Rice; [Todd\\_Stefanic@nps.gov](mailto:Todd_Stefanic@nps.gov); Wayne Butts; William Frederiksen  
Subject: Brief Update

Well, you haven't missed any correspondence from me, just in case you've had that thought. We are still in a holding pattern awaiting some final issue resolution at the national level. There are ongoing meetings between FWS and BLM/Forest Service and we should be hearing something soon. Sorry I don't have more to share at this point. Once we have more definitive direction in hand and a better grasp on the upcoming schedule then I'll get a call scheduled for us.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

**Meredith Zaccherio**

---

**From:** Beck, Jonathan <jmbeck@blm.gov>  
**Sent:** Thursday, April 23, 2015 10:30 AM  
**To:** bcc@co.blaine.id.us; lschoen@co.blaine.id.us; dcrane@cassiacounty.org; timbri.hurst@cassiacounty.org; depperjd@id.doe.gov; dbal@qwestoffice.net; dbal0680@gmail.com; madco@madison.mt.gov; jraymond@co.jefferson.id.us; shrj@juno.com; lcarter@co.bingham.id.us; lmiller@co.fremont.id.us; cowdoc75@hotmail.com; dblocksom@idcounties.org; trice@beaverheadcounty.org; bbreedlove@co.custer.id.us; ripper@mudlake.net; commiss@co.twin-falls.id.us; Jonathan Beck  
**Cc:** Kurt Wiedenmann; Jeffery Foss; Brent Ralston  
**Subject:** IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS Information Call

County Cooperators: My name is Jonathan Beck and I am the new GRSG project lead for the IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS filling in behind Brent Ralston

. As you are aware, the Bureau of Land Management (BLM) is in the midst of an unprecedented land use planning effort. The BLM is preparing 15 Environmental Impact Statements and amending or revising 68 land use plans for the conservation of the Greater Sage-Grouse. We anticipate completing the planning process this summer. As a cooperating agency, the Bureau of Land Management will be providing you an administrative draft of the IDswMT Greater Sage-Grouse Proposed Plan Amendment/FEIS during the week of April 29 for a two week review.

I am writing to invite you to an informational call on **Tuesday April 28th** to kickoff the cooperator review at **10:00 AM**.

I look forward to visiting on the 28th. The call in information is below.

Thanks for you continued interested. Jon

The Call In number is:

866-916-4861

The Passcode is: 4369869#

Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

**Ralston, Brent E**

---

**From:** Ralston, Brent E  
**Sent:** Monday, April 30, 2012 8:48 AM  
**To:** Shaver, Christine K  
**Subject:** OSC Agreement Technical Evaluation  
**Attachments:** TE w criteria\_narrative OSC SG Agreement.docx

Chris,

Here is the Technical Evaluation for the OSC Agreement.

Brent Ralston  
Sage-Grouse Project Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812



## Technical Evaluation

Memorandum

DATE: April 27, 2012

To: Grants Management Officer: Christina Shaver

From: Program Officer: Brent Ralston

Write a review of the proposal (referring to the attached criteria):

1. Technical Approach – The proposal contains relevant details and specific approaches to address adequately the information criteria. Duties and expertise of Task Force members are adequately described and the timeframe and expectations are clearly articulated.
2. Qualifications, Experience, Past Performance – The identified personnel to be involved in the effort have sufficient expertise and knowledge to successfully complete project goals. The project leadership are well qualified to facilitate the successfully completion of this effort.
3. Purpose, Objectives, and Relevance – The proposal is consistent with and will appropriately supplement the State's involvement with the BLM Planning Strategy to provide a consistent state approach.
4. Budget – The budget is reflective of the needs and requirements necessary to complete the effort.

What is proposed?

Support of the Idaho Governor's Task Force to develop a State approach and viable BLM planning alternative for Greater Sage-Grouse that can be incorporated into the sub regional environmental impact statement.

Specific qualities:

The proposal contains thorough delineation of personnel, travel and supply expenses required.

Found in the budget: Specifically personnel effort and travel expenses.

Salaries – see I. Budget Table A & B; travel expenses - Table D; supplies Table E; other logistics – Tables F & G.

I **do** recommend funding to State of Idaho Office of Species Conservation.

Amount of \$ 75,000

Period of Performance: March 2012 to September 2012.

## **Application review Information Criteria**

### **1. Technical Approach**

- a. The project design contains enough detail to show the development of the project and the relationship between the partners, milestones, and goals. The roles and responsibilities of each partner are clearly articulated. The milestones are clear, and supported by a well thought-out schedule that supports the work to be accomplished for the duration of the project.
- b. The proposed project's importance/relevance and applicability are tied to the program goals. Is there value and importance to the program goals?
- c. The work plan objectives are clear, suitable, and feasible with respect to the following:
  - (1) Techniques, procedures, and methodologies;
  - (2) Data collection, analysis, and means of interpretation;
  - (3) Expected results or outcomes; and
  - (4) Procedures for evaluating project efficacy, including fixed performance indices with probabilities for obtaining them.
- d. The project proposal work plan is designed to produce the proposed outcomes and outputs. The outcomes are clearly stated and tied to intermediate outcomes as stated in the solicitation.

### **2. Qualifications, Experience, Past Performance**

- a. The qualifications and experience of the organization are evident, and appear to be adequate to achieve project goals and objectives.
- b. The qualifications and experience of the Project Director/Principal Investigator to be assigned for direct work on the project are evident, and appear to be adequate to achieve project goals and objectives and will be available for work on this agreement.
- c. The applicants past and current assistance awards show they have completed project goals.

### **3. Purpose, Objectives, and Relevance**

- a. The proposal adequately describes why the project is needed by the recipient.
- b. The objectives are well defined, measurable, and realistic for the project's anticipated timeframe.
- c. The benefits support the mission of the recipient and can be tied to a BLM Performance Measure.

### **4. Budget**

- a. The budget line items are appropriate, reasonable, allowable, well justified and commensurate with the level of effort needed to accomplish the project objectives.
- b. The budget breakdown or narrative provides adequate justification for each budget category used. If equipment is requested by the applicant is it fully justified and necessary for the performance and completion of the project?
- c. The applicant and other counterparts cash and in-kind matching funds or contributions are acceptable.

**Ralston, Brent E**

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**From:** Shaver, Christine K  
**Sent:** Thursday, April 26, 2012 6:09 PM  
**To:** Ralston, Brent E  
**Cc:** Foss, Jeffery L  
**Subject:** FW: OSC Sage Grouse Agreement Update  
**Attachments:** OSC Application.pdf; Conflict of Interest Statement.dot; TE w criteria\_narrative.docx

Hi Brent,

Attached is the application from OSC for the Sage Grouse Task Force agreement. Please review and complete the attached technical evaluation and conflict of interest statement and return to me. Thanks and please let me know if you have any questions.

Chris Shaver  
Lead Grants Management Officer  
BLM, Idaho State Office  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-3817  
(208) 373-3915 Fax

-----Original Message-----

**From:** Shaver, Christine K  
**Sent:** Wednesday, April 25, 2012 3:55 PM  
**To:** Ralston, Brent E  
**Cc:** Foss, Jeffery L  
**Subject:** OSC Sage Grouse Agreement Update

Hi Brent,

I left a message for Jon Beals at OSC inquiring about additional information he was to submit for the additional \$25,000 provided last week. Jon plans on submitting tomorrow. Sorry this has taken longer than anticipated. However, the documents are required before I can make award. Thanks

Chris Shaver  
Lead Grants Management Officer  
BLM, Idaho State Office  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-3817  
(208) 373-3915 Fax

-----Original Message-----

**From:** Foss, Jeffery L  
**Sent:** Thursday, April 19, 2012 11:29 AM  
**To:** Shaver, Christine K; Ralston, Brent E  
**Cc:** Foss, Jeffery L; Ditton, Peter J  
**Subject:** OSC sage grouse agreement- status?

The Gov's office is asking about the status of the agreement/grants for the funds we are providing to the Govs Sage grouse task force? We meet with them tomorrow at noon.

Thanks

Jeff

**Application for Federal Assistance SF-424**

Version 02

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify)</b> <input type="text"/>
---	---	---

<b>* 3. Date Received:</b> Completed by Grants.gov upon submission.	<b>4. Applicant Identifier:</b> <input type="text"/>
--	---

<b>5a. Federal Entity Identifier:</b> <input type="text"/>	<b>* 5b. Federal Award Identifier:</b> <input type="text"/>
---	--

**State Use Only:**

<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>
--	--

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="82-60000952"/>	<b>* c. Organizational DUNS:</b> <input type="text" value="142406284"/>
--	--

**d. Address:**

**\* Street1:**   
**Street2:**   
**\* City:**   
**County:**   
**\* State:**   
**Province:**   
**\* Country:**   
**\* Zip / Postal Code:**

**e. Organizational Unit:**

<b>Department Name:</b> <input type="text" value="Governor's Office"/>	<b>Division Name:</b> <input type="text" value="Office of Species Conservation"/>
---	--

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**  **\* First Name:**   
**Middle Name:**   
**\* Last Name:**   
**Suffix:**

**Title:**

**Organizational Affiliation:**

**\* Telephone Number:**  **Fax Number:**

**\* Email:**

Opportunity Title:	Idaho Comprehensive Wildlife Conservation Strategy (CWC)
Offering Agency:	Bureau of Land Management
CFDA Number:	15.231
CFDA Description:	Fish, Wildlife and Plant Conservation Resource Management
Opportunity Number:	L12AS00002
Competition ID:	
Opportunity Open Date:	11/14/2011
Opportunity Close Date:	07/31/2012
Agency Contact:	Melinda Ritacco Grants Management Officer E-mail: mritacco@blm.gov Phone: 208-373-4018

This electronic grants application is intended to be used to apply for the specific Federal funding opportunity referenced here.

If the Federal funding opportunity listed is not the opportunity for which you want to apply, close this application package by clicking on the "Cancel" button at the top of this screen. You will then need to locate the correct Federal funding opportunity, download its application and then apply.

This opportunity is only open to organizations, applicants who are submitting grant applications on behalf of a company, state, local or tribal government, academia, or other type of organization.

\* Application Filing Name:

### Mandatory Documents

Move Form to Complete

Move Form to Delete

### Mandatory Documents for Submission

Application for Federal Assistance (SF-424)  
Project Narrative Attachment Form  
Budget Narrative Attachment Form  
Budget Information for Non-Construction Program  
Assurances for Non-Construction Programs (SF-42)

### Optional Documents

Move Form to Submission List

Move Form to Delete

### Optional Documents for Submission

## Instructions

- 1** Enter a name for the application in the Application Filing Name field.

  - This application can be completed in its entirety offline; however, you will need to login to the Grants.gov website during the submission process.
  - You can save your application at any time by clicking the "Save" button at the top of your screen.
  - The "Save & Submit" button will not be functional until all required data fields in the application are completed and you clicked on the "Check Package for Errors" button and confirmed all data required data fields are completed.
- 2** Open and complete all of the documents listed in the "Mandatory Documents" box. Complete the SF-424 form first.

  - It is recommended that the SF-424 form be the first form completed for the application package. Data entered on the SF-424 will populate data fields in other mandatory and optional forms and the user cannot enter data in these fields.
  - The forms listed in the "Mandatory Documents" box and "Optional Documents" may be predefined forms, such as SF-424, forms where a document needs to be attached, such as the Project Narrative or a combination of both. "Mandatory Documents" are required for this application. "Optional Documents" can be used to provide additional support for this application or may be required for specific types of grant activity. Reference the application package instructions for more information regarding "Optional Documents".
  - To open and complete a form, simply click on the form's name to select the item and then click on the => button. This will move the document to the appropriate "Documents for Submission" box and the form will be automatically added to your application package. To view the form, scroll down the screen or select the form name and click on the "Open Form" button to begin completing the required data fields. To remove a form/document from the "Documents for Submission" box, click the document name to select it, and then click the <= button. This will return the form/document to the "Mandatory Documents" or "Optional Documents" box.
  - All documents listed in the "Mandatory Documents" box must be moved to the "Mandatory Documents for Submission" box. When you open a required form, the fields which must be completed are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message.
- 3** Click the "Save & Submit" button to submit your application to Grants.gov.

  - Once you have properly completed all required documents and attached any required or optional documentation, save the completed application by clicking on the "Save" button.
  - Click on the "Check Package for Errors" button to ensure that you have completed all required data fields. Correct any errors or if none are found, save the application package.
  - The "Save & Submit" button will become active; click on the "Save & Submit" button to begin the application submission process.
  - You will be taken to the applicant login page to enter your Grants.gov username and password. Follow all onscreen instructions for submission.

**Application for Federal Assistance SF-424**

Version 02

**9. Type of Applicant 1: Select Applicant Type:**

A: State Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

Bureau of Land Management

**11. Catalog of Federal Domestic Assistance Number:**

15.231

**CFDA Title:**

Fish, Wildlife and Plant Conservation Resource Management

**\* 12. Funding Opportunity Number:**

L12AS00002

**\* Title:**

Idaho Comprehensive Wildlife Conservation Strategy (CWCS) 2012

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Southern 1/3 of Idaho

**\* 15. Descriptive Title of Applicant's Project:**

State Of Idaho - Governor's Sage Grouse Task Force Coordination

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

<b>Application for Federal Assistance SF-424</b>		Version 02
<b>16. Congressional Districts Of:</b>		
* a. Applicant	ID-All	* b. Program/Project ID-All
Attach an additional list of Program/Project Congressional Districts if needed.		
	Add Attachment	Delete Attachment View Attachment
<b>17. Proposed Project:</b>		
* a. Start Date:	03/01/2012	* b. End Date: 02/28/2015
<b>18. Estimated Funding (\$):</b>		
* a. Federal	150,000.00	
* b. Applicant	15,000.00	
* c. State	0.00	
* d. Local	0.00	
* e. Other	0.00	
* f. Program Income	0.00	
* g. TOTAL	165,000.00	
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>		
<input type="checkbox"/>	a. This application was made available to the State under the Executive Order 12372 Process for review on	
<input type="checkbox"/>	b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/>	c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)</b>		
<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
		Explanation
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b>		
<input checked="" type="checkbox"/> ** I AGREE		
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.		
<b>Authorized Representative:</b>		
Prefix:		* First Name: Dustin
Middle Name:		
* Last Name:	Miller	
Suffix:		
* Title:	Acting Administrator	
* Telephone Number:	208-332-1555	Fax Number:
* Email:	dustin.miller@osc.idaho.gov	
* Signature of Authorized Representative:	Completed by Grants.gov upon submission.	* Date Signed: Completed by Grants.gov upon submission.



**BUDGET INFORMATION - Non-Construction Programs**

OMB Number: 4040-0006  
Expiration Date: 06/30/2014

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Governor's Sage Grouse Task Force Coordination	15.231	\$	\$	\$ 150,000.00	\$ 15,000.00	\$ 165,000.00
2.						
3.						
4.						
<b>5. Totals</b>		\$	\$	\$ 150,000.00	\$ 15,000.00	\$ 165,000.00

## Budget Narrative File(s)

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\* Mandatory Budget Narrative Filename:

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To add more Budget Narrative attachments, please use the attachment buttons below.

SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program	(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS	
8. <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 15,000.00;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 15,000.00;" type="text"/>	
9. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
10. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
11. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
<b>12. TOTAL (sum of lines 8-11)</b>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 15,000.00;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 15,000.00;" type="text"/>	
SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ <input style="width: 95%; text-align: right; value: 150,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 50,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 50,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 25,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 25,000.00;" type="text"/>
14. Non-Federal	\$ <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
<b>15. TOTAL (sum of lines 13 and 14)</b>	\$ <input style="width: 95%; text-align: right; value: 150,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 50,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 50,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 25,000.00;" type="text"/>	\$ <input style="width: 95%; text-align: right; value: 25,000.00;" type="text"/>
SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT					
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)				
	(b) First	(c) Second	(d) Third	(e) Fourth	
16. <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	
17. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
18. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
19. <input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>	
<b>20. TOTAL (sum of lines 16 - 19)</b>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	\$ <input style="width: 95%;" type="text"/>	
SECTION F - OTHER BUDGET INFORMATION					
21. Direct Charges: <input style="width: 95%;" type="text"/>		22. Indirect Charges: <input style="width: 95%;" type="text"/>			
23. Remarks: <input style="width: 95%; text-align: left; value: OSC has incorporated a 5% administrative cost into the application." type="text"/>					

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1)	(2)	(3)	(4)	
	Governor's Sage Grouse Task Force Coordination				
a. Personnel	\$ 65,000.00	\$	\$	\$	\$ 65,000.00
b. Fringe Benefits	25,000.00				25,000.00
c. Travel	35,000.00				35,000.00
d. Equipment	2,500.00				2,500.00
e. Supplies	5,000.00				5,000.00
f. Contractual	10,000.00				10,000.00
g. Construction	0.00				
h. Other	7,500.00				7,500.00
i. Total Direct Charges (sum of 6a-6h)	150,000.00				\$ 150,000.00
j. Indirect Charges	0.00				\$
k. TOTALS (sum of 6i and 6j)	\$ 150,000.00	\$	\$	\$	\$ 150,000.00
7. Program Income	\$ 0.00	\$	\$	\$	\$

Authorized for Local Reproduction

Standard Form 424A (Rev. 7-97)  
Prescribed by OMB (Circular A -102) Page 1A

Governor's Sage Grouse Task Force Coordination – Project Narrative

Funding Opportunity Number: L12AS00002

CFDA # and Title: 15.231 Fish and Wildlife Plant Conservation Resource Management

Funding Agency: DOI Bureau of Land Management

Applicant: State of Idaho, Office of Species Conservation

Acting Administrator: Dustin Miller

Phone Number: 208-332-1555

Date: March 15, 2012

### Purpose

The State of Idaho and its partners have been proactive leaders in greater sage-grouse conservation for many years. Since the late 1990s, an unprecedented collaborative of state and federal resource managers, local government and private stakeholders has been a major factor in maintaining sustainable populations of the bird and improving its habitat. Unfortunately, in March of 2010, after several petitions to and list and multiple rounds of litigation, the U.S. Fish and Wildlife Service (Service) determined that greater sage-grouse warrants listing under the Endangered Species Act (ESA) across its entire range, including the populations in Idaho, but is precluded because of other higher priority listing actions. This action places greater sage-grouse on a "candidate" species list. The Service must reevaluate the status of greater sage-grouse under the ESA by September 30, 2015.

Given this short window, the federal government and many western states within the range of greater sage-grouse are currently working to develop regulatory mechanisms to conserve the species and preclude the need to list. On March 9, 2012 Idaho Governor C.L. "Butch" Otter signed an Executive Order creating a Sage-Grouse Task Force. The Task Force is charged with providing recommendations to the Governor for developing a state-wide regulatory mechanism and plan to preclude the need to list sage-grouse. The development of a state-specific regulatory mechanism will enable the U.S. Bureau of Land Management and the U.S. Forest Service to incorporate the State's plan as an alternative to their analysis pursuant to the National Environmental Policy Act (NEPA). Additionally, the Task Force will develop recommendations for actions on state and private lands to provide adequate protections for the bird and its habitat. The Idaho statewide regulatory mechanism covering actions on private, state and federal land will be given the full force and effect of law through a final Executive Order signed into law by Governor Otter.

It is our hope that in addition to the many years of collaborative conservation work in Idaho, this effort will ultimately result in the Service making a not-warranted decision for greater sage-grouse by September 30, 2015. By avoiding a listing, the State of Idaho and its partners will continue its commitment to conserving greater sage-grouse and its habitat while maintaining predictable land uses and protecting Idaho's custom, culture and way of life.

## Objectives

- A. Provide the Governor of Idaho with recommendations on policies and actions, using the 2006 Sage Grouse Plan and other on-going activities as a backdrop, for developing a state-wide regulatory mechanism to preclude the need to list the species.
- B. The Sage-Grouse Task Forces' recommendations be based upon the following objectives and criteria:
  - a. Conserve the species and its habitat while maintaining predictable levels of land use
  - b. Identifies and designates key/core sage-grouse habitat based upon the biological needs of the species
  - c. Tailors the management recommendations to the import of the habitat and its attuned to the interests of the State
  - d. Address the following primary threats to the species as identified by the Service
    - i. habitat fragmentation due to wildfire
    - ii. invasive species
    - iii. conversion of habitat for agriculture or urbanization
    - iv. energy development/infrastructure
  - e. Address the following secondary threats to the species identified by the Service
    - i. disease/West Nile virus
    - ii. management issues related to livestock grazing
    - iii. collisions with fences and power lines
    - iv. mining, prescribed fire and range treatments
    - v. water development
    - vi. conifer invasion
  - f. Utilize the 2006 Plan and other on-going activities as a backdrop for making management recommendations
  - g. Identifies opportunities for pro-active sage-grouse habitat enhancement projects
  - h. Recognizes, encourages and incentivizes land use practices that are actively maintaining or improving sage-grouse habitat as evidenced by improvements in habitat quality, active lek routes or stable/increasing populations of the species
  - i. Identifies additional opportunities for continued involvement in sage-grouse conservation issues at the local level

## Relevance

The inadequacy of regulatory mechanisms to conserve the greater sage-grouse and its habitat was identified as a significant threat in the FWS finding on the petition to list the greater sage-grouse as a threatened or endangered species. (Federal Register /Vol. 76, No. 237 / Friday, December 9, 2011)

Based on ongoing threats to the Greater sage-grouse and its habitat throughout the West, and the U.S. Fish and Wildlife Service's schedule for making a decision whether to list the species under the Endangered Species Act, the BLM and the U.S. Forest Service have begun to revise

land-use plans (LUPs) for lands that include sage-grouse habitat to incorporate consistent objectives and conservation measures into all relevant plans by September 2014. (Federal Register /Vol. 76, No. 237 / Friday, December 9, 2011)

In view of the identified threats to the greater sage-grouse, and the FWS timeline for making a listing decision on this species, the BLM and FS propose to incorporate consistent objectives and conservation measures for the protection of greater sage-grouse and its habitat into relevant RMPs and LMPs by September 2014 in order to avoid a potential listing under the Endangered Species Act. (Federal Register /Vol. 76, No. 237 / Friday, December 9, 2011)

The Governor's Sage-Grouse Task Force goal is to establish a state-wide regulatory mechanism in a timeframe that will allow its recommendations to be incorporated into the BLM's planning effort.

#### Technical Approach

In order to insure that its recommendations are included into the BLM's planning process, the sage-grouse Task force is operating within a very aggressive timeframe. It is the Governor's expectation that the Task Force will submit their recommendations for his review no later than 31 May 2012. Consequently, the Governor signed the Executive Order establishing the approach that the State of Idaho will take in this effort and how the State intends to use CWCS funds.

1. The creation of the Governor's Sage-Grouse Task Force:
  - A. The members of the Governor's Sage-Grouse Task Force (Task Force) shall be appointed by and serve at the pleasure of the Governor through calendar year 2012.
    - a. The Task Force shall be composed of fifteen (15) members, representing the various geographic areas of the State within the range of the species
    - b. The Office of the Governor will chair this entity
    - c. The Office of Species Conservation and the Idaho Department of Fish and Game will staff this entity
  - B. The Task Force members shall be appointed from the following categories:
    - a. Individuals who:
      - i. Represent agricultural interests; or
      - ii. Represent energy or mineral development interests
    - b. Individuals representing:
      - i. A local working group; or
      - ii. A nationally, regionally or locally recognized environmental organization;  
or
      - iii. Nationally or locally recognized wildlife or sportsmen's groups
    - c. Individuals who:
      - i. Hold State elected office; or
      - ii. Hold county elected office; or
      - iii. Represent the public at large

2. Duties of the Task Force:  
Provide the Governor recommendations on policies and actions, using the 2009 Plan and other on-going activities as a backdrop, for developing a state-wide regulatory mechanism to preclude the need to list the species;
3. The duties of the Task Force are solely advisory
4. The Task Force will provide its recommendations to the Governor no later than May 31, 2012
5. Technical Expertise:
  - A. The Task Force may request consultation, information and technical expertise from Directors or their designees of state agencies regarding the biological needs of the species, activities on state, federal and private lands potentially impacted by the status of the species, and requirements of the ESA and other relevant statutory requirements, including but not limited to the Office of Species Conservation, the Idaho Department of Fish and Game, the Idaho Department of Lands, the Office of Energy Resources, the Idaho State Department of Agriculture and the Idaho Department of Parks and Recreation.
  - B. The Task Force may request comments, information and technical expertise from the American Indian Tribes of Idaho, the universities of the State, federal agencies, including but not limited to the Service, the BLM, the U.S. Forest Service and the Natural Resources Conservation Services, and members of the public.
6. Task Force Composition:
 

Representative Scott Bedke	– Elected Office
Senator Bert Brackett	– Elected Office
Wally Butler	– Idaho Farm Bureau
Bob Cope	– Lemhi County Commissioner
Brett Dumas	– Idaho Power
Gene Gray	– Sage Grouse Local Working Group
Jerry Hoagland	– Owyhee County Commissioner
Chuck Jones	– Simplot
Jack Oyler	– Sportsmen’s Group
Rochelle Oxarango	– Sage-Grouse Local Working Group
John Robison	– Idaho Conservation League
Richard Savage	– Idaho Cattle Association
Randy Vranes	– Monsanto
Will Whelan	– The Nature Conservancy
Bell Meyers	– Attorney



### Qualifications, Experience and Past Performance

The Office of Species Conservation (OSC) was created by the Idaho Legislature in 2000 to coordinate all state policy for threatened and endangered species. OSC's authority to pursue this goal is defined in Idaho Code:

1. Coordinate federal Endangered Species Act (ESA) programs with State agencies (Idaho Code § 67-818).
2. Solicit, provide, and delegate funding for ESA programs (Idaho Code § 67-819).
3. Create de-listing advisory teams (Idaho Code § 36-2402, 2403, 2404).
4. Serve as the State's "one-voice" on ESA policy (Idaho Code § 67-818, 2(a)).
5. Provide a mechanism for Idaho citizens to voice ESA concerns (Idaho code § Section 67-818, 2(g)).
6. Facilitate collaboration between State, federal and private stakeholders (Idaho Code §67-818, 2(b) (c) (d) (g)).

Our office consists of 12 full time staff as follows: Administrator, Program Manager, Legal Counsel, Environmental Liaison, five Project Managers, two project planners and an Administrative Assistant. Our Administrator position is currently open with duties and responsibilities being handled by our Environmental Liaison. We receive accounting support from the State of Idaho Division of Financial Management (DFM), under the Executive Office of the governor. DFM provides fiscal and policy guidance, oversight and management services to OSC.

Since OSC was created, our office has actively been involved with federal, state, local government, and Idaho citizens in coordinating and implementing threatened and endangered species policy. Funding for OSC comes from state and federal sources. OSC has administered nearly \$30 million in federal funds for implementation of species recovery and restoration projects. We currently administer federal programs for salmon recovery, gray wolf recovery, slickspot peppergrass, freshwater aquatic species and sage-grouse.

The Office of Species Conservation proposes to administer the funds required by the Governor's Sage- Grouse Task Force to complete its assigned tasks within the constraints of BLM policy development timelines. It is the intent of the Governor's Office to use these funds to pay for expenditures associated with task force meetings, data requirements and the documents produced by the Governor's Sage-Grouse Task Force as well as for implementation of the actions to be outlined in the Governor's final Executive Order.

7. Task Force Subcommittees and Assignments:

*Fire / Invasive Species*

Wally Butler

Senator Brackett

John Robison

Will Whelan

Richard Savage

Bob Cope

Agencies: BLM, USFWS, IDL, U of I, ISDA

*Infrastructure*

Brett Dumas

Bill Meyers

John Robison

Randy Vranes

Jack Oyler

Representative Bedke

Agency: OER

*Secondary Effects*

Will Whelan

Chuck Jones

Wally Butler

Richard Savage

Rochelle Oxarango

Agencies: IDL, OSC, BLM, USFWS, PR

*Local Issues*

Gene Gray

Jerry Hoagland

Representative Boyle

Bob Cope

8. Schedule:

Eight meetings over 12 days as follows:

March 12 – Boise

March 20 – Boise

April 4 – Boise

April 12-13 – Idaho Falls

April 24-25 – Pocatello

May 3-4 – Boise

May 15 – Twin Falls

May 24-25 – Idaho Falls

Governor's Sage Grouse Task Force Coordination - Budget Narrative  
 Funding Opportunity Number: L12AS00002  
 CFDA # and Title: 15.231 Fish and Wildlife Plant Conservation Resource Management  
 Funding Agency: DOI Bureau of Land Management

Applicant: State of Idaho, Office of Species Conservation  
 Acting Administrator: Dustin Miller  
 Phone Number: 208-332-1555  
 Date: April 3, 2012

The Office of Species Conservation ("OSC") was created by the Idaho Legislature in 2001 and has been the recipient, administrator, and distributor of federal funds beginning in Federal Fiscal Year 2001. This is a comprehensive request involving several budget categories associated with the cost of convening a task force of Idaho constituencies to develop adequate regulatory mechanisms public and private lands in Idaho.

It is the Governor's office intent to use these funds on a reimbursement basis to pay for expenditures associated with task force goals and objectives including the following:

- Salaries
- Per Diem
- Travel Expenses
- Data Requirements
- Documentation
- Misc. meeting costs

The following is an estimated breakdown of the funds requested from BLM the other cost share partners:

<b>Budget Category</b>	<b>Federal</b>	<b>State/Local</b>	<b>Total</b>
Personnel	\$21,600	\$10,000	\$31,600
Fringe	\$8,500	\$5,000	\$13,500
Travel	\$11,600		\$11,600
Equipment	\$800		\$800
Supplies	\$1,600		\$1,600
Contractual	\$3,300		\$3,300
Construction	\$0		\$0
Other	\$2,600		\$2,600
<b>Totals</b>	<b>\$50,000</b>	<b>\$15,000</b>	<b>\$65,000</b>



# I. BUDGET

This is a suggested format for the applicant to use for the detailed budget/costs breakdown. Each cost item should clearly show how the total charge for that item was determined. All major costs should be listed in budget categories similar to those listed below, and all cost items should be explained in the Budget Summary and Justification (Section 4).

**A. SALARIES AND WAGES.** Provide the names and/or titles of key project personnel.

Name/Title of Position	Full Time Monthly Salary	% FTE	No. of Months	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
Dustin	\$4560	.50	4	\$9120	\$	\$	\$9120
Ashley	\$2651	.50	4	\$5302	\$	\$	\$5302
Jon	\$4249	.10	3	\$1020	\$	\$	\$1020
TBD	\$4500	.10	3	\$1080	\$	\$	\$1080
	\$			\$	\$	\$	\$
Subtotal				\$16,522	\$	\$	\$16,522

**B. FRINGE BENEFITS.** If more than one rate is used, list each rate and the wage or salary base.

Rate	Salary or Wage Base	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
.362	\$ 9120	\$3301	\$	\$	\$3301
.4556	\$ 5302	\$2416	\$	\$	\$2416
.3707	\$ 1020	\$378	\$	\$	\$378
tbd	\$ 1080	\$400	\$	\$	\$400
Subtotal		\$6495	\$	\$	\$6495

**C. CONSULTANT/CONTRACTING FEES.** This should include payments for professional and technical consultants participating in the project.

Name and type of Consultant	# of Days	Daily Rate of Compensation	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
		\$	\$	\$	\$	\$
		\$	\$	\$	\$	\$
		\$	\$	\$	\$	\$
		\$	\$	\$	\$	\$
		\$	\$	\$	\$	\$
Subtotal			\$	\$	\$	\$

**D. TRAVEL AND PER DIEM.** For each trip, indicate the number of persons traveling, the total days they will be in travel status, and the total subsistence and transportation costs for that trip. Per diem rates shall not exceed maximum Federal rates. To view current Federal per diem rates, visit <http://www.gsa.gov/Portal/gsa/ep/channelView.do?pageTypeld=8203&channelId=-15943> and follow the links to per diem information.

From/To	No. of People	No. of Travel Days	Per diem (lodging and meals) per person per day	Total per diem (lodging and meals) for this trip	Transportation costs (airfare and mileage) <u>per person</u>	<u>Total transportation costs</u> (airfare and mileage) <u>for this trip</u>	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
Boise	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Boise	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Boise	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Idaho Falls	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Pocatello	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Boise	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Twin Falls	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Idaho Falls	15	2	\$100	\$3000	\$114	\$1706	\$4706	\$	\$	\$4706
Misc.	4	5	\$100	\$2000	\$114	\$455	\$2455	\$	\$	\$2455
Subtotal							\$40105	\$	\$	\$40105

**E. SUPPLIES AND MATERIALS.** Include consumable supplies and materials to be used in the project, listing each item and quantity individually. Include items of expendable equipment, i.e., equipment costing less than \$500 or with an estimated useful life of less than two years. Equipment costing more than that should be listed in the Other Costs category (Category G, below).

Item	# of items	Cost	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
Photocopies	5000	\$0.10	\$500	\$	\$	\$500
Office Supplies	1	\$500	\$500	\$	\$	\$500
Maps and Data	1	\$4000	\$4000	\$	\$	\$4000
			\$	\$	\$	\$
			\$	\$	\$	\$
			\$	\$	\$	\$
Subtotal			\$5000	\$	\$	\$5000

**F. SERVICES.** This should include the cost of duplication and printing, long distance telephone calls, equipment rental, postage, and other services not previously listed.

Item	Method of Computation	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
IT Tech Support – Web		\$2400	\$	\$	\$2400
IT Tech Support – Video Conferencing		\$2400	\$	\$	\$2400
		\$	\$	\$	\$
		\$	\$	\$	\$
Subtotal		\$4800	\$	\$	\$4800

**G. OTHER COSTS.** List equipment items in excess of \$500, and other items not previously listed. Note that equipment items worth less than \$500 or that have a useful life of less than 2 years must be listed in the Supplies and Materials category.

Item	Cost	Grant Funds	Match / Cost Share (if any)	Third Party Share (if any)	Total
Laptop for Administrator	\$600	\$600	\$	\$	\$600
Software	\$600	\$600	\$	\$	\$600
Meeting Room Rentals	\$878	\$878	\$	\$	\$878
	\$	\$	\$	\$	\$
	\$	\$	\$	\$	\$
Subtotal		\$2078	\$	\$	\$2078

**H. INDIRECT COSTS.** If indirect costs will be charged to the grant, complete the table below with your current approved indirect cost rate and the direct costs it will be applied to. A copy of your most recent indirect cost rate must be

attached if indirect costs will be requested.		
* The Direct Costs from items 1 -- 6 to which the indirect cost rate applies	Current Approved Indirect Cost Rate Percentage (%)	Indirect Cost Rate Amount
\$	%	\$

**Budget Justification.** Provide a brief narrative justification of all cost items, including matching funds, listed in the budget. Be specific and explain why these items are necessary to accomplish the grant objectives. If the project involves travel costs, include a brief summary of each trip (for example, Project Director and two students will fly from Hometown to Someplace and stay three days to examine Someplace Museum's collection). **Note: Travel is limited to this project only. If purchasing or renting computer equipment or other large budget items follow the procedures in 43CFR, Subpart C, Section 12.76 for State, local and Indian tribal governments or Subpart F, Section 12.940 through 12.948 for institutions of higher education, hospitals, other non-profit and all other organizations, as applicable.**



CONFLICT OF INTEREST/NON-DISCLOSURE CERTIFICATE

Idaho Comprehensive Wildlife Conservation Strategy 2012 L12AS00002

I certify that I am not aware of any matter which might reduce my ability to participate in the proposal evaluation proceedings and activities associated with the above funding opportunity in an objective and unbiased manner or which might place me in a position of conflict, real or apparent, between my responsibilities as an evaluator or advisor and other interests.

In making this certification, I have considered all my stocks, bonds, other financial interests, outside business associates, and employment arrangements (past, present, or under consideration) and, to the extent known by me, all the financial interests and employment arrangements of my spouse, my minor children, and other members of my immediate household.

I will notify the Grants Management Officer, if any person, firm, or organization submits a proposal or otherwise becomes involved in the subject project, if to my knowledge, I (including my spouse, minor children, other members of my immediate household) have a financial interest, or with which I have or am actually considering an employment arrangement. Further, based on advice from the servicing ethics counselor, I will agree not to participate further in any way (e.g., by rendering advice, making recommendations, scoring proposals, or otherwise in the particular subject matter or project).

I have also read and understand the Federal Employee Non-Disclosure Statement.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

THIS CERTIFICATION CONTAINS A MATTER WITHIN THE JURISDICTION OF AN AGENCY OF THE UNITED STATES AND THE MAKING OF A FALSE, FICTITIOUS, OR FRAUDULENT CERTIFICATION MAY RENDER THE MAKER SUBJECT TO PROSECUTION UNDER TITLE 18, UNITED STATES CODE, SECTION 1001.

## FEDERAL EMPLOYEE NON-DISCLOSURE STATEMENT

The proper treatment of official information related to the financial assistance process (requirement definition, validation, evaluation, selection proceedings, negotiations, etc.) is of the utmost importance.

An employee may not directly or indirectly use or allow the use of official information obtained through or in connection with his Government employment. Attention is invited to the provisions of 43 CFR Part 12 - Administrative and Audit Requirements and Cost Principals for Assistance Programs.

Title 18 U.S.C. 201 prescribes specific penalties for a Government official accepting, or anyone directly or indirectly promising to a Government official, anything of value with intent to influence an official act or otherwise influence the Government official.

U.S.C. Title 18, Sec. 1905, states: "Whoever, being an officer or employee of the United States or any department or agency thereof, ..., publishes, divulges, discloses, or makes known in any manner or to any extent not authorized by law any information coming to him in the course of his employment or official duties or by reason of any examination or investigation made by, or return, report or record made to or filed with, such department or agency or officer or employee thereof, which information concerns or relates to the trade secrets, processes, operations, style of work, or apparatus, or to the identity, confidential statistical data, amount or source of any income, profits, losses, or expenditures of any person, firm, partnership, corporation, or association; or permits any income return or copy thereof or any book containing any abstract or particulars thereof to be seen or examined by any person except as provided by law, shall be fined not more than \$1,000 or imprisoned not more than one year; or both; and shall be removed from office or employment."

Title 18 U.S.C. 207 restricts the participation of former Government officers and employees with regard to any matter in which participation has been personal and substantial.

Employees shall not reveal any information to anyone who is not also participating in the same activities, and then only to the extent that such information is required in connection with such activities. Such information is classified "FOR OFFICIAL USE ONLY". The dissemination of information in this category to other parties will be at the sole discretion of the Grants Management Officer. Request for Application information, Technical Evaluation Panel members, applicants proposals, proposal evaluation information and documents, and similar materials will be handled and discussed on a need-to-know basis only. Under no circumstances may application information, proposals, evaluation information, or selection criteria or plans be removed from the confines of the technical evaluation meeting area without the specific authorization of the Grants Management Officer. In this regard, the methodology used or planned for use in evaluating and selecting recipients will not be discussed or otherwise disclosed except on a "need-to-know" basis established by the Grants Management Officer on a case-by-case basis.

Any unauthorized disclosures contrary to the foregoing provisions may result in appropriate disciplinary action pursuant to applicable statutory provision.

## Technical Evaluation

Memorandum

DATE

To: Grants Management Officer \_\_\_\_\_

From: Program Officer \_\_\_\_\_

Write a review of the proposal (referring to the attached criteria):

What is proposed?

Specific qualities:

Found in the budget: Specifically personnel effort and travel expenses.

I **(do/do not)** recommend funding to \_\_\_\_\_.

Amount of \$ \_\_\_\_\_

Period of Performance: \_\_\_\_\_ to \_\_\_\_\_.

## **Application review Information Criteria**

### **1. Technical Approach**

a. The project design contains enough detail to show the development of the project and the relationship between the partners, milestones, and goals. The roles and responsibilities of each partner are clearly articulated. The milestones are clear, and supported by a well thought-out schedule that supports the work to be accomplished for the duration of the project.

b. The proposed project's importance/relevance and applicability are tied to the program goals. Is there value and importance to the program goals?

c. The work plan objectives are clear, suitable, and feasible with respect to the following:

- (1) Techniques, procedures, and methodologies;
- (2) Data collection, analysis, and means of interpretation;
- (3) Expected results or outcomes; and
- (4) Procedures for evaluating project efficacy, including fixed performance indices with probabilities for obtaining them.

d. The project proposal work plan is designed to produce the proposed outcomes and outputs. The outcomes are clearly stated and tied to intermediate outcomes as stated in the solicitation.

### **2. Qualifications, Experience, Past Performance**

a. The qualifications and experience of the organization are evident, and appear to be adequate to achieve project goals and objectives.

b. The qualifications and experience of the Project Director/Principal Investigator to be assigned for direct work on the project are evident, and appear to be adequate to achieve project goals and objectives and will be available for work on this agreement.

c. The applicants past and current assistance awards show they have completed project goals.

### **3. Purpose, Objectives, and Relevance**

a. The proposal adequately describes why the project is needed by the recipient.

b. The objectives are well defined, measurable, and realistic for the project's anticipated timeframe.

c. The benefits support the mission of the recipient and can be tied to a BLM Performance Measure.

### **4. Budget**

a. The budget line items are appropriate, reasonable, allowable, well justified and commensurate with the level of effort needed to accomplish the project objectives.

b. The budget breakdown or narrative provides adequate justification for each budget category used. If equipment is requested by the applicant is it fully justified and necessary for the performance and completion of the project?

c. The applicant and other counterparts cash and in-kind matching funds or contributions are acceptable.

Chairman Wayne Butts & Jim Hawkins,

The BLM appreciates your continued interest in the National Greater Sage-Grouse Planning Strategy. For Custer County, Todd Kuck – Challis Field Office Manager, is the primary contact for coordination and routinely attends county and NRAC meetings to share information with the county about BLM activities and gather input from the county. Since the National Greater Sage-grouse Planning Strategy and Idaho and southwestern Montana EIS effort is broader in scope than the Challis Field Office, I am available to attend, with Todd, the county commissioner meeting on May 30<sup>th</sup> and/or the NRAC meeting on June 6<sup>th</sup>.

BLM has been working with Idaho Department of Fish and Game to develop and delineate sage-grouse preliminary priority habitat in Idaho. The updated versions of these maps were released at the end of last week and are available via the BLM website: [http://www.blm.gov/id/st/en/sage-grouse\\_rmp\\_revision.html](http://www.blm.gov/id/st/en/sage-grouse_rmp_revision.html).

Todd will be sharing these maps at the next NRAC meeting and, in June, I can discuss further that information with the group. If you would like to have other data or information provided by the BLM, please let me know so that I may come prepared.

BLM appreciates the invitation and I look forward to meeting with Custer County Officials. If these dates do not work for scheduling please let me know so that we can make other arrangements.

**Brent Ralston**

---

**From:** dbalsecr@gmail.com  
**Sent:** Wednesday, July 02, 2014 2:12 PM  
**To:** Ralston Brent  
**Cc:** Balfour Doug  
**Subject:** Sage Grouse Conference Call  
**Attachments:** 20140702140821195.pdf

PLEASE SEE ATTACHED.....

Thank you,  
Lisa Rodriguez  
Secretary to Douglas J. Balfour  
(208) 233-0680  
(208) 233-0319 (fax)

This communication, including any attachment, contains information that may be confidential and/or privileged, and is intended solely for the entity or individual to whom it is addressed. If you are not the intended recipient, you should delete this message and are hereby notified that any disclosure, copying, or distribution of this message is strictly prohibited. If you receive this email in error, please contact the sender immediately either by return email or at #(208) 233-0680.

# Memorandum

To: Brent Ralston  
From: Douglas J. Balfour ✓  
Date: July 2, 2014  
RE: Sage Grouse Conference Call

---

Brent,

I completely spaced the Conference Call this morning. It is too bad, because I was anxiously looking forward to it. In any case I have reviewed your notes, and hopefully will see the documents later this afternoon.

I hope you will not be upset if I have to call you for clarifications, as I was not on the call and could not ask questions.

In the mean time, I am confused by some of your acronyms:

- ES&R
- NSO
- ROW (I presume right of way)
- RDFs
- BMPs
- RFPA

Thanks.

Doug

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Wednesday, July 02, 2014 12:42 PM  
**To:** Angenie McCleary (bcc@co.blaine.id.us); Bob Shirley; 'Dennis Crane (dcrane@cassiacounty.org)'; 'Dennis Crane (timbri.hurst@Cassiacounty.org)'; 'depperjd@id.doe.gov'; dmlamb01@gmail.com; 'Douglas Balfour (dbal@qwestoffice.net)'; 'Douglas Balfour (dbal0680@gmail.com)'; Happel, Dan; James Hart (madco@madison.mt.gov); 'Jerald Raymond (jraymond@co.jefferson.id.us)'; 'Jerry Hoagland (shrj@juno.com)'; Ladd Carter (lcarter@co.bingham.id.us); 'Lawrence Schoen (lschoen@co.blaine.id.us)'; 'Lee Miller (lmiller@co.fremont.id.us)'; 'Meredith Zaccherio (meredith.zaccherio@empsi.com)'; 'Mickelsen, Robert (rmickelsen@fs.fed.us)'; 'OCNRCDIR@aol.com'; 'Robert Cope (cowdoc75@hotmail.com)'; 'Seth Grigg (sgrigg@idcounties.org)'; 'Terry Kramer'; Thoms Rice (trice@beaverheadcounty.org); 'Todd\_Stefanic@nps.gov'; Wayne Butts (bbreedlove@co.custer.id.us); 'William Frederiksen (ripper@mudlake.net)'  
**Subject:** Notes from Today's Call  
**Attachments:** CoopAg Meeting Notes Final 2014-07-02.docx

Here are the notes from today's call.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812



# Idaho/Southwest Montana Subregion Sage-Grouse RMP/EIS

## Cooperating Agency Call

July 2, 2014 10:00 a.m. MST

### Attendance

BLM: Brent Ralston

Counties: Bill Frederiksen – Clark County; Doyle Lamb – Custer County; Ladd Carter – Bingham County; Gerald Raymond – Jefferson County

### Action Items

- Review the proposed plan and components and send Brent comments in the comment form provided by July 18<sup>th</sup>.

### Meeting Minutes

#### *Project Update*

- Working with the Washington Office and National USFWS office regarding direction for the proposed plan. Have been approved to move forward with the proposed plan. Preparing administrative draft proposed plan.
- A review package with the proposed decisions will go out today or tomorrow to the counties. Asking for a 2 week review period for comments, concerns, and questions. Look at the management actions and see if there's anything in conflict with the county land use plans.
- The proposed plan (Alternative G) contains about 40 pages of management decisions broken down by program area. Brent will send two electronic files: 1) proposed decisions (40 pages); 2) supporting documentation/appendices that are directly associated with the proposed decisions and provide more detail and background (150 pages). Brent will also send a comment form with directions. Send comments to Brent by **July 18<sup>th</sup>**.
- A number of federal and state cooperating agencies have been involved in preparing the plan (e.g., Forest Service, ID Office of Species Conservation, IDFG, Montana FWP).
- Expect to compile administrative final EIS by mid-late august and will share the full document around that time.
- The proposed plan will be sent to all county cooperators, including INL and Craters of the Moon, as well as the tribes. Plan has been shared with the state. Will not be distributed widely before September at the earliest.

#### *Proposed Plan Overview*

- Proposed plan was prepared by combining key components of Alternatives D and E. While the text will not be exactly the same, it is similar to both of those alternatives.
- Brent reviewed the proposed plan section by section as summarized below.

- Summary of all decisions up front.
- Discussion of goals and objectives; includes habitat treatments (still working on acreages)
- General direction – following laws, the last couple items relate to RDFs, BMPs, seasonal restrictions, and lek buffer distances for implementation activities (details included as an appendix).
- Coordination with other agencies
- Management Areas – two maps: 1) Conservation Areas – Similar to Alternative E but added one Conservation Area for Montana; 2) Three management zones (similar to Alternative E) – Core (CMZ), Important (IMZ), and General (GMZ). Montana does not have any Important Management Zones.
- Adaptive management – Based on habitat and population measurements. Soft trigger – look at site-specific changes; hard trigger would require a land use plan amendment. Similar to Alternative E, if a hard trigger is tripped, IMZ would be managed as CMZ.
- Baseline map – will continue to use key habitat map to track the change in acres for adaptive management. This map is updated on an annual basis.
- Anthropogenic disturbance – included a 3% disturbance threshold based on USFWS concerns. Evaluated percent disturbance (large infrastructure, does not include fences, two-track roads, or range improvement projects) within CMZ and IMZ by Conservation Area. All areas range between 0.8 percent to 2.2 percent development.
- Exception criteria for CMZ and development criteria for IMZ – they are the same as Alternative E, though some changes have been made for clarity.
- Mitigation – setting up a mitigation board at the state level. Still working out the details. Develop a state-wide mitigation strategy built on the Idaho framework for mitigation.
- Wildfire: a number of actions related to preparedness, suppression, fuels management and ES&R:
  - Working with the RFPAs and pre-season coordination efforts.
  - Complete Wildfire and Invasive Species Assessments to help prioritize areas on a field office basis; identify areas for fuel breaks, etc. GRS is the highest priority after life and property.
  - Fuels management, including targeted grazing, using existing ROWs.
  - ES&R primarily with native seeds.
- Habitat restoration and vegetation management – similar to some of the ES&R management, it is just done under a different program. Focus on Stage 1 and 2 juniper stands – rapid recovery because understory still there.
- Lands and realty – linked closely with the anthropogenic disturbance threshold and the criteria for when projects would be allowed. Identify ROW exclusion, avoidance, and avoidance. All CMZ and IMZ are ROW avoidance – must meet the criteria. Some exclusions in CMZ: wind, solar, hydropower, nuclear, and commercial service airports. Land tenure adjustments described.
- Fluid mineral development – low and no potential areas within CMZ are closed; moderate and high potential areas in CMZ and IMZ are open with NSO. Geothermal has a different potential map.

- Phosphate – no Known Phosphate Leasing Areas (KPLAs) in CMZ. Outside of KPLAs, CMZ is closed. IMZ in KPLA open; outside KPLAs, must meet the development criteria.
- Grazing – point to rangeland health assessment process.
- Wild horse and burros – no changes
- Travel management – limited to existing routes unless already identified as an open play area. Follow up with travel management planning to designate the routes.
- Monitoring

**Brent Ralston**

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**From:** Brent Ralston  
**Sent:** Wednesday, July 02, 2014 2:22 PM  
**To:** 'Douglas J. Balfour'  
**Subject:** CA Call

Doug,

I missed you on the call! I'm sure you've got lots of 'irons in the fire' as they say. This call was not critical – the major information we wanted to share is the upcoming review period. We have a draft of the proposed plan and want to provide a review timeframe. The volume of materials is less than what we've shared for review previously ~200 pages with 40 pages the primary focus.

We are preparing that review package to be sent out today or tomorrow so you should get it in the mail in the next several days.

Sorry for all the acronyms. Here is a brief description of the ones you brought to my attention –

ES&R – emergency stabilization and rehabilitation, a program within BLM to address conditions after a fire

NSO – no surface occupancy - fluid mineral leasing stipulation

ROW – you got this one right-of-way

RDF – required design features, previously called best management practices but would be required

BMP – best management practices typically practices and procedures considered at the implementation level to reduce impacts

RFPA – rural fire protection association, this is referring to the State of Idaho supported rural fire protection associations being developed in vvarious areas across the state.

Thanks for your continued interest and involvement in this effort.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

## Brent Ralston

---

**From:** Meredith Zaccherio  
**Sent:** Wednesday, July 02, 2014 12:23 PM  
**To:** Brent Ralston  
**Subject:** RE: Upcoming Cooperating Agency Call - July 2nd at 11:00 a.m.  
**Attachments:** CoopAg Meeting Notes 2014-07-02.docx

Hi Brent,  
Attached are notes from this morning's call.  
Meredith

**Meredith Zaccherio**  
EMPSi Environmental Management and Planning Solutions, Inc.  
26 O'Farrell Street, 7th Floor  
San Francisco, CA 94108  
tel: 415-544-0440 fax: 866-698-4836  
[www.EMPSi.com](http://www.EMPSi.com) Twitter: EMPSiInc Facebook: EMPSi

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**From:** Brent Ralston [<mailto:bralston@blm.gov>]  
**Sent:** Friday, June 27, 2014 3:24 PM  
**To:** Angenie McCleary; Bob Shirley; Dennis Crane; Dennis Crane; [depperjd@id.doe.gov](mailto:depperjd@id.doe.gov); [dmlamb01@gmail.com](mailto:dmlamb01@gmail.com); Douglas Balfour; Douglas Balfour; Happel, Dan; James Hart; Jerald Raymond; Jerry Hoagland; Ladd Carter; Lawrence Schoen; Lee Miller; Meredith Zaccherio; Mickelsen, Robert; [OCNRCDIR@aol.com](mailto:OCNRCDIR@aol.com); Robert Cope; Seth Grigg; Terry Kramer; Thoms Rice; [Todd\\_Stefanic@nps.gov](mailto:Todd_Stefanic@nps.gov); Wayne Butts; William Frederiksen  
**Subject:** Upcoming Cooperating Agency Call - July 2nd at 11:00 a.m.

Thank you to everyone that responded, with that information I have set up our next call for Wednesday, July 2<sup>nd</sup> at 11:00 a.m. until 12:00 p.m.

We will be discussing the draft proposed plan and the upcoming review opportunity as well as the schedule.

The call-in information is:

1-800-779-0698  
42162#

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

# Idaho/Southwest Montana Subregion Sage-Grouse RMP/EIS

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July 2, 2014 10:00 a.m. MST

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**Brent Ralston**

---

**From:** Powell, Katie  
**Sent:** Monday, September 29, 2014 8:58 AM  
**To:** Brent Ralston  
**Subject:** Re: Adaptive Management Trigger Clarification

Brent:

This clears up the confusion, in my opinion.

Thank you!  
Katie

On Tue, Sep 23, 2014 at 12:25 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

It has been brought to my attention that the adaptive management triggers for habitat described in the plan may be a bit confusion now that we have developed the concept of biologically significant units and effective habitat (key habitat). What we have in the plan currently is:

**5.1.** Adaptive Regulatory Criteria for Hard Habitat Triggers are defined as:

A 20 percent combined loss of nesting and/or wintering habitat within CMZ within a CA compared to the 2011 biologically significant unit (BSU) baseline (Map 3) (The BSU is defined as the nesting and wintering habitat within Core and Important Management Zones within a Conservation Area, inclusive of all ownerships and is used in the evaluation of the adaptive regulatory triggers and the anthropogenic disturbance cap); or

All the habitat triggers read in a similar fashion. I would suggest we change this wording to resolve any inconsistency with our description of the BSUs to:

*A 20 percent loss of Key Habitat within the biologically significant unit (BSU) of the CMZ of a CA when compared to 2011 acreages (the BSU is defined as the nesting and wintering habitat within a Core and Important Management Zones (separately) within a Conservation Area, inclusive of all ownerships); or...*

So essentially we are replacing "...combined loss of nesting and/or wintering habitat..." with "...loss of Key Habitat within the biologically significant unit (BSU)..."

Since we have defined the BSU as those areas of nesting and wintering habitat within the Core or Important MZs (two BSUs per Conservation Area – 1 for Core, one for Important) the new language eliminates this duplicative description and clearly identifies what we are concerned about losing within those areas – Key Habitat. This also is consistent with the BSU appendix that we have worked on and will be included in the FEIS.

Let me know if you have concerns about this change or other suggested wording.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

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Katie Powell  
Wildlife Biologist - Conservation Partnerships  
U.S. Fish and Wildlife Service  
1387 S. Vinnell Way  
Boise, ID 83709  
Office: [208-378-5293](tel:208-378-5293)  
Fax: [208-378-5262](tel:208-378-5262)

## Brent Ralston

---

**From:** Moore, Virgil  
**Sent:** Monday, October 20, 2014 7:21 AM  
**To:** Brent Ralston  
**Subject:** RE: Disturbance

Brent

Thanks for all you are doing. Your presentation last week was great and the approach is one I will work to help all understand.

Virgil

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

**From:** Brent Ralston  
**Date:** 10/19/2014 10:20 PM (GMT-07:00)  
**To:** James Lyons, Sarah Greenberger  
**Cc:** Edwin Roberson, Timothy Murphy, Jeffery Foss, "Dustin T. Miller", "Moore, Virgil", Michael Carrier  
**Subject:** Disturbance

Jim and Sarah,

Last week's discussion with the State of Idaho seemed very productive and helped focus the specific needs we continue to work forward to resolve. The discussion on the Idaho disturbance approach was also valuable and I appreciate the opportunity to describe our approach. It's a complicated subject and not something that is easy to get to the heart of quickly. Attached you'll find a more thorough description of the approach and its derivation and relation to the appropriate science. – the first ten pages focus on disturbance, the remainder of the document describes Idaho's adaptive management process and calculation.

If you'd like any further information or clarification or have questions we can provide additional information.

We will continue to work on the 'elevator speech' on disturbance which goes something like this – "Idaho applies a 3% anthropogenic disturbance cap to priority and important habitat management areas to limit habitat loss and fragmentation; measured within nesting and brood rearing habitats associated with lek areas and critical wintering areas within priority and important habitat management areas and calculated consistent with existing scientific literature".

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion Idaho State Office  
208-373-3812

### Responses to Concerns Raised Regarding Idaho's Disturbance Calculation:

**Concern:** Idaho BLM generated a novel equation for calculating disturbance for the purposes of monitoring for disturbance caps.... It is unclear why Idaho BLM developed its own disturbance calculation apart from the rest of the Great Basin planning areas as we have been asking for consistency to the extent possible.

**Response:** The alternative included in the Draft EIS's describing the National Technical Team Report (Alternative B in the Idaho and Southwestern Montana DEIS) included a management action to apply a 3% disturbance cap. However, there was no description of how this would be applied, calculated or implemented in subsequent management. The Preferred Alternatives (D & E) did not include a disturbance cap since disturbance was not identified as a major concern causing loss of habitat in Idaho or Southwestern Montana and its measurement and applicability was not defined and deemed highly problematic to implement in a meaningful way. When, during the early 2014 Federal Family Meeting USFWS indicated that inclusion of such a disturbance threshold was necessary in order for USFWS to have the assurance and certainty necessary when assessing GRSG listing. At that point, outside of Wyoming's Disturbance Density Calculation Tool there was no developed approach to measure or calculate disturbance to evaluate a disturbance cap against.

Idaho BLM invited Dr. Steve Knick to discuss his study regarding disturbance (the only known scientific research describing a disturbance cap). Also as a result of that FFM the BLM's NOC began working on developing a disturbance calculation process that was not as intensive as the Wyoming DDCT approach, based on BLM guidance that anthropogenic disturbance measurement would not follow that approach in other states due the intensive and workload associated with that approach would not be feasible to implement in other states.

Idaho BLM followed the provided guidance to develop biologically significant units (BSUs). The NOC developed 3 equations to try and relate disturbance and habitat. These equations were specifically applicable to broad scales but not applicable to site specific scales. Idaho BLM took the information and built a simple equation measuring and evaluating absolute disturbance to compare against the cap. That equation was defined as:

$$\frac{\text{Acres of Anthropogenic Disturbance within } h \text{ BSU}}{\text{Acres within } h \text{ BSU}}$$

At the time of the August Federal Family Meeting the Idaho BLM had further refined the previous equation to more accurately reflect the findings in Knick's research. Disturbance was discussed at that meeting and it was evident that there was no other clear guidance from either the WO, the NOC or efforts from other states in this subject. Idaho was the only state to have put effort into the need identified by USFWS and the only effort to have a reasonable, scientifically based approach. Idaho did not intentionally deviate from consistent approaches being developed

apart from the other Great Basin planning areas; and in fact until more recently Idaho is the only Great Basin planning effort to have put an approach together.

**Concern:** Although IFWO did not express significant concerns when the calculation was presented by Idaho BLM, since the disturbance cap in Idaho is not likely to be hit under either method,... That said, IFWO is confident that the conservation outcomes for sage-grouse will be the same regardless of the calculation methodology because the anthropogenic disturbance cap is not likely to be hit under either methodology in Idaho.

**Response:** Loss of habitat from anthropogenic disturbance is not a major issue in Idaho and Southwestern Montana; however, that does not mean that measurement and evaluation of a disturbance cap can be arbitrary, or any less supportable, or inconsistent with the scientific research available if that research can help inform the conditions and evaluation appropriately.

That is why the Idaho disturbance calculation is defined consistent with the scientific research making it reflective of the known effects to GRSG and supportable to base management decisions upon.

**Concern:** ...our recent collective review of this equation in more detail (Pat, Jesse, and Jason) suggests that the genesis of this equation was based on the erroneous assumption that other planning efforts were not "incorporating fire" into their disturbance calculations. They note this in their rationale provided in draft proposal - "[a straight 3% disturbance cap] would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation." This is not true - all other planning areas are accounting for changes to the amount of available habitat (what Idaho BLM calls effective habitat) in the denominator of their disturbance calculations.

**Response:** The Idaho calculation does consider the effect fire has on the habitat and includes loss of habitat from fire as part of the calculation by weighting the denominator based on the actual habitat available to the GRSG. At the time Idaho developed this scientifically based formula there were no other planning effort attempts to describe the disturbance cap so it would be impossible for Idaho to make any assumptions based on those other efforts, erroneous or otherwise, since none existed. The rationale described is in direct reference to the original equation Idaho BLM used:

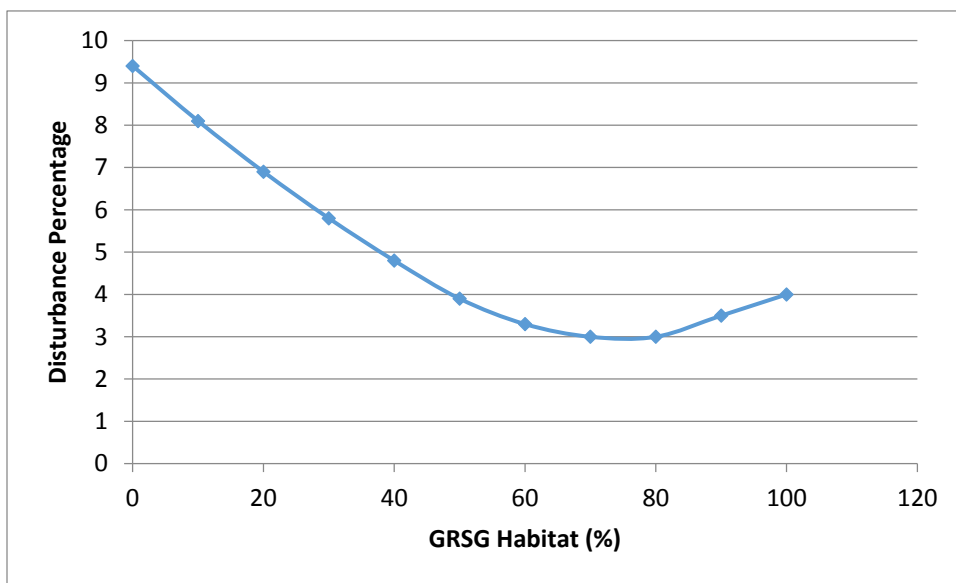
$$\frac{\text{Acres of Anthropogenic Disturbance within h BSU}}{\text{Acres within h BSU}}$$

Which does not account for changes in habitat due to loss through fire or gain through restoration. Currently, all other planning efforts may have calculations that account for changes in available habitat; however, the existence of these calculations now, roughly six months after Idaho's approach was developed is hardly evidence that the assumptions described in Idaho's approach are erroneous or in some way invalid. As stated previously Idaho's approach was not

developed as a deviation or in comparison to other planning effort attempts at calculating the disturbance cap because such attempts did not yet exist when Idaho's approach was completed.

**Concern:** In addition, the equation inserts two terms in their disturbance calculation that make the equation unnecessarily complex and difficult to interpret. First a term for the entire area of the BSU is included in the denominator, yet anthropogenic disturbance is only being measured in the effective habitat. Second, the inclusion of a "constant" is added as a correction factor. The result of adding these terms is that in some circumstances the amount of disturbance (in acres) actually allowed under a 3% cap would vary significantly depending on the equation applied...

**Response:** The two terms at issue here are precisely what make the equation relevant and scientifically accurate and supportable, they may make the calculation more complex but natural systems are complex and mathematical equations developed to describe those systems may be somewhat complex. That they are difficult to interpret does not invalidate their inclusion and the value in numerical description those terms contribute to describing a complex situation. The actual relationship described in Knick et al., when graphed would resemble:



This graph shows the conceptual relationship curve of anthropogenic disturbance suggested by Knick et al. In that research it was shown that when anthropogenic disturbance reached 3% within an area surrounding leks (5-18km) then lek attendance was impacted through fewer birds attending on leks. In the graph above the curve assumes that the area described has 3% of its acres under some sort of anthropogenic developed. According to Knick et al. when 70-80 percent of an area is effective habitat for GRSG then anthropogenic development totaling 3% of that area will start to reduce lek attendance. That research also shows that if the effective habitat percentage within that area is over 90% or less than 70% lek attendance is affected when less than 3% of the area contains anthropogenic development. This relationship would

mathematically be described using a parabolic (as opposed to a linear) equation, making it a much more accurate reflection of a complex system but also making it even more complex and difficult to interpret. In addition, while Knick et al. suggests this relationship, and defines the effects at a 3% anthropogenic disturbance level in conjunction with 70-80% effective habitat. Knick et al., and we are aware of no other scientific studies, does not describe the trajectory of the curve above 80% or below 60%, so actually developing a more accurate, parabolic formula, is not possible at this time.

The Idaho equation is:

$$Disturbance\ Percentage = \left( \frac{Footprint\ Acres\ from\ Anthropogenic\ Disturbance\ in\ the\ BSU}{Acres\ within\ the\ BSU * \left( \frac{Acres\ of\ Effective\ Habitat\ within\ the\ BSU}{Acres\ within\ the\ BSU} + 0.3 \right)} \right) \times 100$$

This equation is meant to describe a spatially reality, for that reason it is imperative that the terms be linked with that spatially reality. Without this link any equation descriptive of a spatial reality would become meaningless to the reality it is trying to describe. The purpose of a disturbance cap and a supporting disturbance calculation is to measure and evaluate anthropogenic disturbance over a given area. For the purposes of application this area is defined as the biologically significant unit or BSU. For Idaho the BSU was delineated consistent with BLM guidance and reflective of the Knick et al. research. Idaho's BSU are defined as: all of the modeled nesting and delineated winter habitat, which is based on 2011 data, occurring within Priority and/or Important Habitat Management Areas within individual Conservation Areas for all land ownerships. Modeled nesting habitat is defined as a 10 km area around leks. Based on Idaho Department of Fish and Wildlife surveys and monitoring information this area around leks encompasses a vast majority of the nesting habitat (i.e. IDFG data show that over 90% of nesting occurs within 10 km of the lek). This 10 km is within the 5-18 km range for which Knick et al. identified their research was applicable. Knick communicated to the Idaho ID Team that beyond 18 km the disturbance relationship to lek attendance described in his research was not discernable). The equation calculates a disturbance value within that BSU area by totaling the acres of disturbance within that area and dividing by that area appropriately adjusted by effective habitat within that area to reflect a higher impact of disturbance when effective habitat is lower than the low end of the 70-80% optimum range (This optimum range is also supported by Connelly et al. 2000 (80%) and the BLM's National Technical Team Report (70%)). The equation does not accurately depict the disturbance relationship when effective habitat is greater than 80%. This is due to the fact the equation is linear as opposed to parabolic (discussed earlier) and that the areas within Idaho of most concern for continued presence of GRSG and impacts from anthropogenic disturbance do not exceed 80% effective habitat. This instance only occurs in the Mountain Valleys Conservation Area where existing disturbance is well below 2%. Therefore the applicability of the equation to these conditions is limited.

Anthropogenic disturbance is being measured and evaluated within the entire BSU, not just the effect habitat area, which is why it is important to define the denominator across the BSU scale, not just a portion of the BSU which is where the spatial link becomes critical. How the

denominator is described mathematically defines the scale over which the numerator is measured; changing that scale would also require adjustments to the numerator to be mathematically correct and maintain the spatial link critical for using a numeric equation to describe a spatial effect.

The presence of the constant (0.3) is a mathematical necessity that defines the relationship, it is neither irrelevant, nor is it a ‘correction’ factor. Correction implies there is something incorrect or erroneous in the equation. The effective habitat denominator adjustment term:

$$\left( \frac{\text{Acres of Effective Habitat within } h \text{ BSU}}{\text{Acres within } h \text{ BSU}} + 0.3 \right)$$

This entire term, in order to accurately reflect Knick et al. (see previous conceptual curve graph), must equal 1 when effective habitat within the BSU represents 70% of the BSU. Without the constant 0.3 added to the effective habitat proportion this term would not equal 1 when effective habitat is at 70%, it would not be a mathematical correct approximation of the disturbance relationship, it would lose its spatial link since this term needs to account for 100% of the acres in the BSU at the 70% habitat/3% disturbance intercept and would therefore become meaningless with respect to the spatial relationship that is being approximated.

That this equation would ‘vary significantly depending on the equation applied...’ is unequivocally correct since different equations may be describing different conditions. The real question becomes does the Idaho equation ‘vary significantly’ when compared to equations describing similar conditions? Essentially are we comparing like outcomes (i.e. apples and apples) or unlike outcomes (i.e. apples and oranges). See concern and response below.

**Concern:** ...with Idaho's equation allowing more disturbance before hitting the cap in some scenarios.

**Response:** This conclusion would need to be qualified based on the validity of the equation being used for comparison. While that specific equation has not been provided to verify that conclusion an Excel spreadsheet was shared and if the equation is represented by the disturbance relationship described in that table then the comparison equation can be expressed as:

$$\frac{\text{Acres of Disturbance}}{\text{Effective Habitat}}$$

This equation has the benefit of simplicity; however there are several fundamental flaws with this simple calculation which without further refinement to link the spatial reality with the mathematical formula make any current comparisons are invalid. This equation does not appropriately address: 1) spatial representation; 2) scale of the calculation; 3) consistency with known science; or 4) multiple considerations of single disturbances (i.e. double counting, which links back to the spatial representation aspect of the equation).



When using mathematical equations to describe real-world conditions it is imperative that the link between the spatial conditions and the mathematical representation of those conditions be understood and maintained. Otherwise any comparison does not have an appropriate foundation for comparison and is ultimately of limited, if any, use. To help illustrate this equation would more accurately be written (which is the relationship described in the Excel Table):

(Acres of Disturbance within Effective Habitat + Acres of Disturbance outside Effective Habitat)

(Acres of Concern (BSU) – Acres outside Effective Habitat)

While more complicated, this equation is more accurately in depicting the actual formula used in the Excel Table provided by USFWS. This is further described when all the acres within the Area of Concern or BSU are Effective Habitat; Acres outside Effective Habitat would be zero, effectively eliminating that term and similarly Acres of Disturbance outside Effective Habitat would be zero since there are no acres outside Effective Habitat, therefore eliminating that term as well; leaving the original simplified version of this equation. However, when there are no Acres outside Effective Habitat within the Acres of Concern is the ONLY condition where this simplified equation actually represents and links to the real-world spatial conditions which are being described. So it is ONLY at this point (when the BSU contains 100% Effective Habitat) that the Idaho methodology and this simple equation can be appropriately compared. As described earlier the Idaho methodology (equation) does not accurately reflect the spatial conditions (according to Knick et al.) above 80% Effective Habitat (See previous discussion regarding why this is not a significant issue in need of resolution). Below 70% Effective Habitat where the Idaho methodology reflects the scientific relationships comparisons; the simple equation loses its spatial link and comparisons are not valid or appropriate.

So why is the spatial link lost? A key principle in translating spatial conditions to mathematical equations is, in this instance, each acre of either disturbance, within effective or outside effective habitat in the equation represents a real acre of disturbance, a real acre within effective habitat, a real acre outside effective habitat. If there are acres outside Effective Habitat within the Area of Concern the more accurate equation described above shows that those acres are REMOVED through subtraction from the denominator. This changes the scale of the calculation (see below) effectively redefining the spatial extent over which the Acres of Disturbance appropriate to the new scale/denominator can be measured. So this equation redefines the spatial extent for comparison through removing acres from the denominator, while at the same time it includes acres of disturbance in the numerator. The spatial representation is lost when the same acres are both included in the numerator but removed from the denominator.

Scale

Consistency with Known Science

Multiple Considerations of Single Disturbances

**Concern:** However, there is general agreement that applying Idaho's methodology more broadly could be problematic, because in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios.

**Response:** Using Idaho's methodology in other states will be problematic. Not because 'in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology could allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios' (see previous response regarding comparison of different spatially representative equations); but because the data needed to support Idaho's methodology are not readily available in other states. Idaho has collected, reviewed and updated on an annual basis for 12+ years a GRSG Key Habitat Map. This map tracks effective habitat, effects to that habitat from fire, restoration efforts and use by GRSG. This is the data utilized in the adjustment factor for the denominator and it is critical to the use of the equation, without this data actual meaningful application of the equation would not be possible or relevant. This is a data set that we are not aware exists within other planning areas. For this reason application of the Idaho methodology poses implementation concerns for areas beyond Idaho.

**Concern:** I thought that effective habitat was defined as areas with 70 to 90% sagebrush land cover (based on Knick et al. 2013). So it wouldn't include all sagebrush cover.

**Response:** For Idaho's methodology effective habitat is taken to be the Key Habitat areas described by the Idaho Key Habitat Map. Key habitat includes areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year. This map also identifies areas that could provide GRSG habitat or currently provide habitat at less than optimum levels. These areas are also spatially depicted and as described as: R1 – perennial grass areas with limited sagebrush presence; R2 – annual grassland areas with limited perennial grasses or sagebrush presence; and R3- juniper encroachment within areas previously dominated by sagebrush.

**Brent Ralston**

---

**From:** Gardetto, Jessica  
**Sent:** Wednesday, June 25, 2014 9:54 AM  
**To:** Kathy Mondor  
**Cc:** Brent Ralston  
**Subject:** Final SG Letters  
**Attachments:** 6.25.14\_Ltr to Tribes for the Draft EIS.docx; 6.25.14\_LTR to Cooperating Agency.docx

Hi Kathy,

Brent approved my changes this morning, so these are ready to go. I assume you still have the tribal contacts from the last time, along with the cooperating agencies list, yes? If not, let me know and I'll make sure I get them to you/help you with it.

I'll come over and chat with you about this as well.

Thank you so much Kathy!

Jessica Gardetto  
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Idaho BLM  
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Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
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United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



In Reply Refer To:  
1610 (ID910)

Nathan Small, Tribal Chairman  
Shoshone-Bannock Tribes  
PO Box 306  
Fort Hall, ID 83203

Dear Chairman Small:

The Bureau of Land Management (BLM) and U.S. Forest Service (USFS) have received numerous agency, tribal, and public comments on the Draft Environmental Impact Statement (EIS) for the Idaho and Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment (LUPA). We are now ready for you to review the Preliminary Proposed Plan Amendment.

In order to meet the timeline for providing our Final EIS/LUPA to the U.S. Fish and Wildlife Service and to provide you with an opportunity to review both the BLM Preliminary Proposed Plan Amendment and the administrative Final EIS/LUPA, you will be receiving the BLM Preliminary Proposed Plan Amendment section of the Final EIS within the next week for a two week review period. This will include the BLM Preliminary Proposed Plan goals, objectives, and management actions and associated map. The USFS Preliminary Proposed Plan Amendments will be included in the Final EIS/LUPA, but are not included at this time for review as they are still under development.

As part of this review, the BLM will ask for comments on these goals, objectives, and management actions. We will be requesting that your comments be submitted to us within two weeks of the release of the Preliminary Proposed Plan Amendment; the specific date is yet to be determined and will be identified with the release of the review package.

We realize this request for a short review period will impact your staff and their workload and thus we thought it appropriate to provide this letter as an advance notification of the pending review. We request that you provide specific information regarding the consistency of the Preliminary Proposed Plan Amendment with your respective Tribal Plans and Tribal rights and interests; specifically noting any inconsistencies you feel may exist. This will allow us to specifically address your comments and concerns as we develop the Final EIS.

This review precedes release to the public. As such, these are not public documents and are being provided for your review based on your unique status and governmental relationship with

the BLM. We request that you maintain the confidentiality of these documents throughout your review until the BLM and USFS release this information to the public.

If you have any questions, contact Brent Ralston (BLM Idaho) at (208) 373-3812 or Rob Mickelsen (USFS) at (208) 557-5762. Thank you in advance for your review and input throughout this planning process; we look forward to receiving your comments.

Sincerely,

Timothy M. Murphy  
Acting Idaho State Director  
Bureau of Land Management

Jamie E. Connell  
Montana State Director  
Bureau of Land Management

Nora Rasure  
Regional Forester  
U.S. Forest Service



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



In Reply Refer To:  
1610 (ID910)

Dear Cooperating Agency:

The Bureau of Land Management (BLM) and U.S. Forest Service (USFS) have received numerous agency, tribal, and public comments on the Draft Environmental Impact Statement (EIS) for the Idaho and Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment (LUPA). We are now ready to share the Preliminary Proposed Plan Amendment with our cooperating agencies.

In order to meet the timeline for providing our Final EIS/LUPA to the U.S. Fish and Wildlife Service and to provide you with an opportunity to review both the BLM Preliminary Proposed Plan Amendment and the administrative Final EIS/LUPA, you will be receiving the BLM Preliminary Proposed Plan Amendment section of the Final EIS within the next week for a two week review period. This will include the BLM Preliminary Proposed Plan goals, objectives, and management actions and associated map. The USFS Preliminary Proposed Plan Amendments will be included in the Final EIS/LUPA, but are not included at this time for review as they are still under development.

As part of this two week review, the BLM will ask for comments on these goals, objectives, and management actions. We will be requesting that your comments be submitted to us within two weeks of the release of the Preliminary Proposed Plan Amendment; the specific date is yet to be determined and will be identified with the release of the review package.

We realize this request for a short review period will impact your staff and their workload and thus we thought it appropriate to provide this letter as an advance notification of the pending review. We request that you provide specific information regarding the consistency of the Preliminary Proposed Plan Amendment with your respective federal, Tribal, State or County Plans; specifically noting any inconsistencies you feel may exist. This will allow us to specifically address the consistency in the Final EIS.

Please remember these are not public documents and are being provided for your review based on your Cooperating Agency relationship with the BLM. We request that you maintain the confidentiality of these documents throughout your review until the BLM and USFS release this information to the public.

If you have any questions, contact Brent Ralston (BLM Idaho) at (208) 373-3812 or Rob Mickelsen (USFS) at (208) 557-5764. Thank you in advance for your review and input throughout this planning process; we look forward to receiving your comments.

Sincerely,

Timothy M. Murphy  
Acting Idaho State Director  
Bureau of Land Management

Jamie E. Connell  
Montana State Director  
Bureau of Land Management

Nora Rasure  
Regional Forester  
U.S. Forest Service



**Idaho State Board of Land Commissioners  
Greater Sage-Grouse Conservation Plan**

April 21, 2015



*Credit KTVB*



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## Executive Summary

Sage-grouse is a candidate species being reviewed by the U.S. Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA).

As part of Idaho's commitment to conserving sage-grouse, the Idaho Department of Lands (IDL) developed conservation measures (CMs) for endowment trust land (endowment lands) management programs and for programs that fall under some IDL regulatory and assistance functions. The CMs for IDL programs that involve sage-grouse habitat are included in the Greater Sage-Grouse Conservation Plan outlined in this document, which the State Board of Land Commissioners (Land Board) and Idaho Oil and Gas Conservation Commission approved in April 2015 (Appendix F and G). The Greater Sage-Grouse Conservation Plan (Land Board's Plan) complements and augments the Governor's statewide plan to conserve the most important habitat for sage grouse in Idaho.

IDL collected comments on a draft sage-grouse plan. Input came from natural resource industry user groups, environmental organizations, and relevant state and federal agencies to fine-tune the plan.

Implementation of the Land Board's Plan is contingent upon the federal government's acceptance and incorporation of the Governor's plan in its final decisions on sage-grouse in Idaho.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits, and easements. For activities that take place on privately owned lands in sage-grouse habitat but involve some IDL regulatory and assistance functions, CMs are presented as voluntary best management practices.

Endowment lands are managed under a mandate in the Idaho Constitution (Article IX Section 8) to maximize long-term financial returns to public schools and other State of Idaho institutions. Approximately 1.4 million acres of the total 2.4 million acres of endowment land in Idaho are rangelands, and nearly half of these endowment rangelands are in Core and Important sage-grouse Habitat Zones identified by the Idaho Alternative, and as concurred by the USFWS.

The IDL also carries out a number of regulatory and assistance duties. The IDL regulatory and assistance responsibilities that affect sage-grouse habitat include regulating certain oil and gas development activities; dredge and placer mine permitting; mine reclamation plan approvals; and abandoned mine land reclamation. The IDL also supports enhanced fire preparedness and suppression in sage-grouse habitat.

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## 1. Brief History

In 2010, the USFWS determined Greater Sage-Grouse (sage-grouse) warranted protection under the ESA, but it was precluded from listing due to higher priority species. In the USFWS decision, the primary threats listed for Idaho were wildfire, invasive species, and infrastructure development.

The timeline for USFWS analysis was further accelerated when in 2011 a multidistrict litigation in the U.S. District Court of the District of Columbia resulted in a settlement agreement between the litigants and the USFWS. The settlement agreement required the USFWS to implement a six-year work plan to enable the agency to systematically review and address the needs of more than 250 species listed on the 2010 *Candidate Notice of Review* to determine if they should be added to the Federal Lists of Endangered and Threatened Wildlife and Plants. The USFWS agreed to determine the listing status of sage-grouse in 2015. Later in 2012, the U.S. District Court for the District of Idaho ruled that pursuant to the D.C. District Court settlement, the USFWS must reevaluate the status of sage-grouse under the ESA by September 30, 2015. In response to these deadlines, then-Secretary of the Interior Ken Salazar invited the 11 western states impacted by a potential listing of the species, including Idaho, to develop state-specific regulatory mechanisms to address the cited deficiencies in an effort to preclude a listing under the ESA.

As a direct outcome of the proposed ESA listing review, the U.S. Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

In March 2012, Governor C.L. "Butch" Otter issued Executive Order No. 2012-02 establishing the Governor's Sage-Grouse Task Force. The task force's goal was ultimately to develop state-specific regulatory mechanisms for the BLM to incorporate the state's plan as an alternative in the BLM environmental analysis pursuant to the National Environmental Policy Act (NEPA) EIS. The *Idaho Alternative* was submitted to the BLM in September 2012. The *Idaho Alternative* was incorporated as Alternative E in the November 2013 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Plan Amendment and EIS, where it was presented as a "co-preferred Alternative" along with the BLM Alternative D.

The Land Board's Plan complements the Governor's *Idaho Alternative* Sage-Grouse Plan for federal land management in Idaho.

The Land Board's Plan utilizes the *State of Idaho Habitat Zone* classifications defined in 2012 by the Governor's task force. Consistent with the *Idaho Alternative*, IDL focuses conservation efforts on the Core and Important Habitat Zones, which include the great majority of the sage-grouse populations in Idaho. There are more than 10,500,000 acres in Core and Important sage-grouse Habitat Zones in Idaho, with the vast majority of these acres under federal management (Table 1.1). IDL has surface or mineral ownership of almost 690,000 acres of Core and Important habitat, with about 619,000 acres of surface ownership in these habitat zones. While the IDL ownership is a relatively small proportion of the 10.5 million acres of habitat (less than 6 percent), almost half of endowment rangelands are found within the Core and Important Habitat Zones.

## 2. Purpose of the Plan

The Plan has a threefold purpose:

- (1) It summarizes CMs for endowment land programs and IDL regulatory and assistance programs that are complementary to the *Idaho Alternative* for sage-grouse conservation actions on federal land.
- (2) It communicates to the USFWS that, along with the *Idaho Alternative*, there are adequate existing regulatory mechanisms to alleviate the primary threats to sage-grouse and sage-grouse habitat in Idaho (such certainty will be necessary to prevent the sage-grouse from being listed under the ESA).
- (3) It preserves the statutory responsibility of IDL to manage endowment lands under a constitutional mandate to maximize long-term financial returns to state institutions, mainly public schools.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

IDL also will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

## 3. Coordination

Utilizing available funding, IDL will collaborate, coordinate, and utilize cooperative planning efforts to implement and monitor proposed CMs to protect and potentially improve sage-grouse habitat. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, lease/permit holders, and nongovernmental organizations.

Current sage-grouse coordination efforts in which IDL is involved include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015),*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project,*
- c. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015),*
- d. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014),*

- e. *Jarbridge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA),*
- f. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015), and*
- g. *Owyhee Land exchange (Agreement to Initiate signed December, 2008).*

In addition, IDL's FY 2016 budget includes a one-time appropriation of \$55,000 from the General Fund to cover IDL personnel costs within the Forest and Range Protection program for two heavy equipment mechanic positions to refurbish water tender equipment. This equipment will be utilized by the rangeland fire protection associations (RFPAs) in suppressing rangeland fire in the sage-grouse landscape. The FY 2016 budget also includes a one-time appropriation of \$195,000 in dedicated funds (Earnings Reserve Fund) for operating expenses within the Lands and Waterways program for fire prevention fuel breaks, conifer encroachment treatments, post-fire seeding, fire prevention brush management, wildlife fencing, flagging, and water development wildlife escape ramps.

#### **4. Greater Sage-Grouse Management Areas**

The Land Board's Plan utilizes the *State of Idaho Habitat Zone* classifications as described in the *Idaho Alternative, September 2012*, and as proposed by the Governor's Sage-Grouse Task Force. The *Idaho Alternative* designated a Sage-Grouse Management Area ("SGMA") with three distinct management zones: Core Habitat ("CHZ"), Important Habitat ("IHZ") and General Habitat ("GHZ"). At this time, IDL is not proposing any CMs for endowment lands or regulatory and assistance activities within the GHZ.

IDL concurs with and repeats the following statements from the *Idaho Alternative*:

*The State recognizes that any attempt to map sage-grouse habitat must, by necessity, be at a broad, programmatic scale. The mapping of boundaries presented above is not intended to equate to verified boundary locations or on-the-ground habitat types from which the public can determine with certainty whether any particular location is inside or outside of a particular management zone.*

*Rather, the mapping exercise is intended to give governmental entities, land managers, project proponents and the public a general idea of where certain types of habitat and conservation priorities are spatially located as of the date of the map. The State also recognizes that this mapping exercising depicting current habitat for the species is not static, and any map must be verified through site-specific environmental analysis.*

As described in the *Idaho Alternative*, additional lands beyond the identification thresholds have "been included in the CHZ to consolidate key breeding areas, to include wilderness areas and lands within national monuments, and to foster population connectivity with neighboring states." The IHZ similarly includes "areas of value for migration corridors, connectivity among breeding areas, and long-term persistence of each of the two key meta-populations of sage-grouse in Idaho." By default of the broad scale mapping exercise, both the CHZ and IHZ also include some areas that are neither sage-grouse habitat nor connectivity corridors.

The *Idaho Alternative* lists specific vegetation criteria to be considered for livestock grazing management on federal lands.

*Grazing within the CHZ and IHZ will be managed according to the process outlined in the text below. The first step, and perhaps the most important, is to inform and educate affected permittees regarding sage-grouse habitat needs and conservation measures. These habitat needs or*



*characteristics outlined in Tables 3-5 will be incorporated into relevant resource management plans as the desired conditions with the understanding that these desired conditions may not be achievable: (a) due to the existing ecological condition, ecological potential or the existing vegetation; or (b) due to casual events unrelated to existing livestock grazing.*

The IDL Range Management/Livestock Grazing measures do not include the vegetative criteria recommended for grazing on federal lands. The IDL livestock grazing component is from the previously vetted and approved 2006 Conservation Plan for the Greater Sage-grouse in Idaho (“2006 Idaho Plan”), and as detailed in Section 16 below.

The *Idaho Alternative* uses a *Core, Important, and General* habitat zone classification that is somewhat different from the BLM subregional alternative habitat classification of *Priority, Important, and General Habitat Management Areas* for Idaho. In addition to differences in habitat classifications there exist variations between on-the-ground habitat mapping in the *Idaho Alternative* and the BLM subregional Alternative. However, both Alternatives recognize the value of a three-tiered habitat approach which is essential to the functionality of the adaptive management process outlined in the *Idaho Alternative*. In 2014, the State of Idaho and the Idaho BLM came to final agreement of the sage-grouse habitat map for purposes of completion of the Final EIS for management actions on federal lands. The State and IDL both recognize the value of having a consistent classification across the sage-grouse landscape in Idaho, and IDL fully adopts the habitat map agreed upon by the State of Idaho and the Idaho BLM.

IDL will recognize any habitat management updates resulting from the five-year formal map review.

## **5. Adaptive Management**

### **5.a. Adaptive Management for Federal Lands**

The *Idaho Alternative* (September, 2012) Adaptive Management Triggers have been further refined and presented to the USFWS (Brian Kelly) in a letter from Governor Otter dated March 14, 2013. The trigger discussion has been copied from that letter, in part for reference:

*The adaptive triggers provide a regulatory backstop to prevent further loss and stabilize habitats and populations in the CHZ, and to a lesser extent in the IHZ, where a demonstrated significant loss has either occurred over time or unexpectedly (i.e., Murphy Complex Fire). These adaptive triggers are employed when dramatic shifts in population or habitat occurs based on an average over a three year period compared to 2011 values. Additionally, these adaptive triggers place the primary and secondary threats to the species in proper context to appropriately evaluate the cause(s) of the decline.*

*In addition to the below description, Idaho’s Alternative utilizes two types of triggers to help determine whether changes in management are necessary. The triggers are broken down into a “soft” trigger and a “hard” trigger. The “soft” trigger becomes operative when one of the following occurs:*

- *10% decline in maximum number of males counted and a finite rate of change below 1.0 but not significantly on CHZ over a period of three years; or*
- *10% loss of nesting and wintering habitat in the CHZ of a Conservation Area over a period of three years.*

When the monitoring information indicates that the “soft trigger” may be tripped, an Implementation Team – aided by the technical expertise of IDF&G – will assess the factor(s) leading to the decline and identify potential management actions. See Idaho Alternative at 7. The Implementation Team<sup>1</sup> may consider possible changes in management to the CHZ. As to the IHZ, the Implementation Team may review the causes for decline and potential management changes only to the extent those factors significantly impair the state’s ability to meet the overall management objective. It is anticipated IDF&G will collect data annually and will make recommendations to the Implementation Team by August 31<sup>st</sup> for population triggers and January 15<sup>th</sup> for habitat triggers. (Per D. Kemner, IDFG, IDFG will collect population data and the BLM will collect habitat data)<sup>2</sup>.

The “hard” trigger becomes operative when one of the following occurs:

- 20% loss in CHZ nesting and/or<sup>2</sup> wintering habitat over a period of three years; or
- 20% decline in maximum number of males counted and a finite rate of change significantly below 1 within a CHZ of a<sup>2</sup> Conservation Area over a period of three years.

If the hard trigger becomes operative according to the monitoring information, management changes are no longer discretionary and will be implemented in the following manner:

First, the IHZ will be managed according to the CHZ provisions primarily impacting the ability to consider infrastructure projects. Like the “soft trigger,” the Implementation Team will analyze the actual cause(s) of the decline. The flow chart (Appendix II of letter is titled Adaptive Trigger Strategy- Determine What Caused a Hard Trigger to Become Operative and What Management Actions are Necessary) illustrates the process used to determine which threat(s) caused the habitat or population loss.

As the illustration denotes, the Service identified wildfire, invasive species, and infrastructure as the primary threats and West Nile Virus, improperly managed grazing, and recreation as secondary threats. This adaptive trigger strategy focuses the analysis on mitigating the primary threats to the

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<sup>1</sup> Excerpted from the clarification letter sent to Steve Ellis, Idaho State Director, BLM from Dustin Miller, Administrator, Governor’s Office of Species Conservation dated July 1, 2013:

As part of the state’s responsibility under the MOU, Governor Otter would issue an Executive Order (under state law, an EO has the force and effect of law) establishing an Implementation Task Force to meet the state’s role and responsibilities under the MOU. This task force would be similar in composition to Governor Otter’s Sage-Grouse Task Force pursuant to Executive Order 2012-02.

The Implementation Task Force would be tasked with providing Governor Otter advice and counsel on at least the following issues: (1) analyzing the annual sage-grouse monitoring data to determine whether an adaptive response is appropriate and necessary given the population and habitat objectives provided in the Governor’s Alternative; (2) providing input during the National Environmental Policy Act (NEPA) process for on-the-ground infrastructure projects; and (3) prioritizing habitat restoration opportunities. The Implementation Task Force would submit these recommendations to the Governor, and based on his review and concurrence, will transmit these recommendation to the appropriate agency as part of the underlying NEPA analysis. The ultimate decision involving public land management would fall to the appropriate agency.

The Implementation Task Force will make recommendations based on the data and recommendations provided by a science subcommittee led by the Idaho Department of Fish and Game (IDFG). The Implementation Task Force may solicit outside experts if necessary.

<sup>2</sup> Personal communication with Don Kemner, Idaho Fish and Game, April 11, 2015 correcting and clarifying items in letter that were refined for the DEIS.

species in the CHZ. Only where the monitoring information indicates the cause(s) of the decline is not a primary threat will the Implementation Team analyze the secondary threats to the species and determine whether further management actions are needed.

Population and habitat objectives are measured against baselines are illustrated in the tables below. The baseline for habitat within each CA is the 2011 nesting and wintering habitat for the CHZ and IHZ. (See Tables 1 and 2, *Idaho Alternative*, 2012.) The population baseline is the maximum number of males counted on lek routes in 2011 within the CHZ and the average finite rate of change of population for 2009-2011 within the CHZ. It is measured the same way in IHZ. CHZ and IHZ triggers are analyzed separately. The habitat triggers are also analyzed separately from the population triggers.

## **5.b. Adaptive Management for Endowment Lands**

While IDL recognizes that the soft and hard triggers would become operative across the landscape in a conservation area, regardless of land ownership, the appropriate response to address a soft or hard trigger tripping will only take place on federal land according to the *Idaho Alternative*. However, if the Implementation Team determines the causal factors are applicable to IDL managed land, IDL commits to implementing CMs tailored to meet the identified causal factor. These would likely be implemented immediately under an emergency action clause pending IDL Director approval. However, any CM to be implemented long-term that is a major deviation from the Land Board's Plan would need to be approved by the Land Board as an amendment to the Plan.

IDL will also utilize monitoring results to make any recommendations to the Land Board for their consideration as amendments to the Plan.

## **6. Anthropogenic Disturbance**

Impacts caused by anthropogenic disturbances on sage-grouse can vary depending on the type of activity and local habitat conditions. In addition, cumulative impacts of multiple activities can have significant, negative impacts on sage-grouse populations. In the *Administrative Draft Proposed Plan*, the BLM utilizes a 3 percent disturbance limit across all landowners within eight Biologically Significant Unit areas. Because endowment lands make up such a small percentage of Core and Important Habitat Zones, IDL will not place a disturbance limit within any defined areas on endowment lands since these limits would result in a violation of the fiduciary trust responsibilities bestowed on the Land Board and IDL in managing endowment lands in accordance with the Constitutional mandate.

## **7. Mitigation**

At this time, the State of Idaho has not finalized a mitigation plan, nor have there been funding sources identified or allocated to implement such a mitigation plan. Idaho's proposed mitigation plan is described in the "Framework for Mitigation of Impacts from Infrastructure Projects on Sage-Grouse and Their Habitats" (Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse Advisory Committee, December 2010).

IDL will commit to following Idaho’s mitigation plan once fully developed to the extent adequate funding exists.

## Plan Format

The Plan format uses two PARTS. PART I presents the CMs IDL will implement in its authorizing documents (e.g. leases) for third party activities on endowment lands. In addition, PART I identifies activities to be undertaken by IDL as the land manager related to fire prevention, wildfire suppression, and land transactions (e.g. land exchanges).

PART II presents the CMs IDL will recommend as voluntary best management practices for mining operators and oil and gas operators on non-state lands. In addition, PART II identifies activities to be undertaken by IDL under its statutory roles regarding fire prevention, wildfire suppression, and abandoned mine land reclamation.

Each Part then follows the numbered headings used in the BLM *Administrative Draft Proposed Plan* as an organizational outline and reader courtesy.

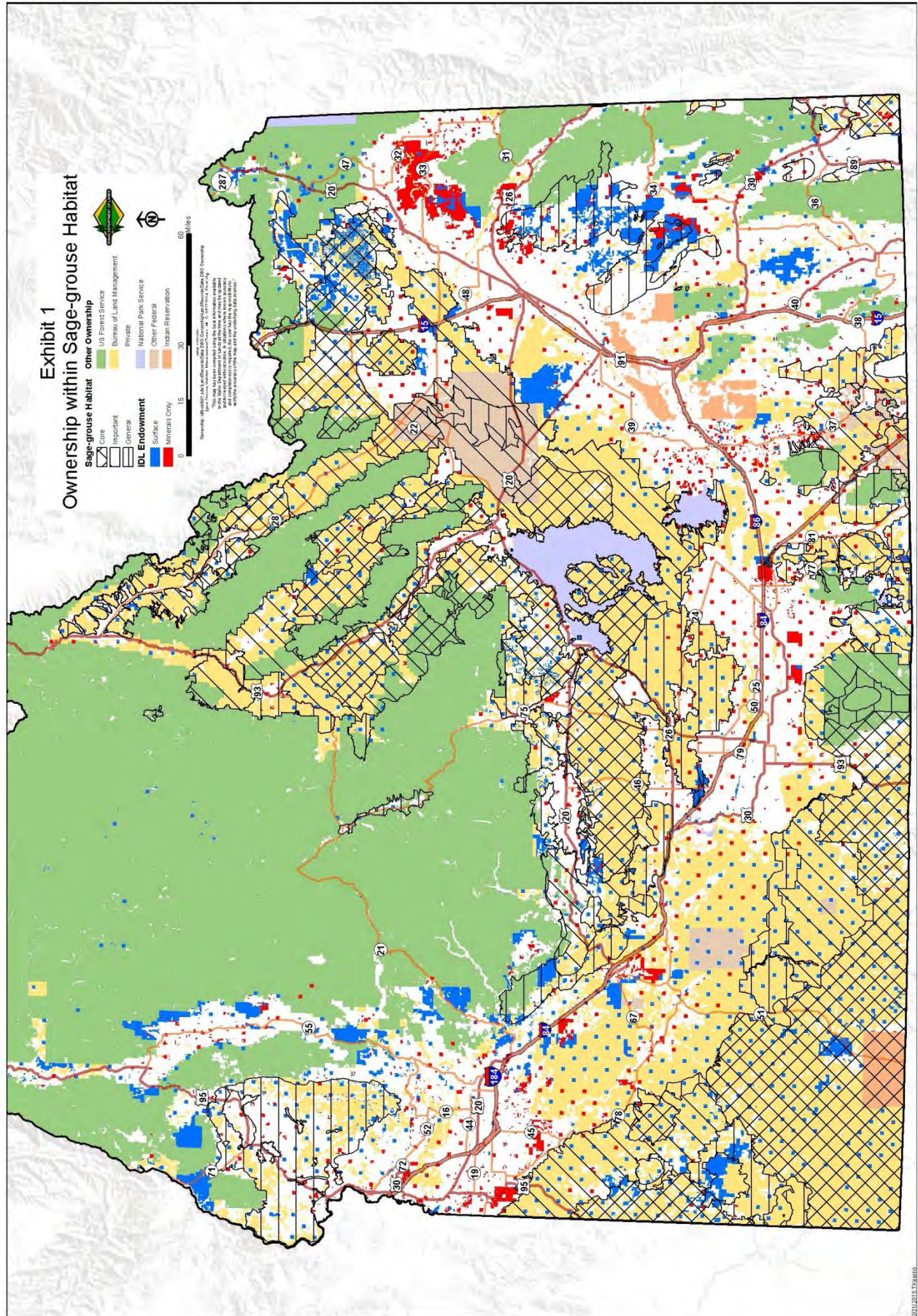
**TABLE 1.1 IDL Ownership within Sage-grouse Habitat by Conservation Area and Habitat Zones**

Conservation Area	Habitat Zone	Total Acres All Owners	Total IDL Ownership		IDL Surface Ownership		IDL Minerals Ownership Only	
		Acres	Acres	%	Acres	%	Acres	%
Idaho Desert	Core	1,017,180	31,702	3.12	29,853	2.93	1,849	0.18
	Important	1,064,653	43,510	4.09	38,710	3.64	4,800	0.45
	Total	2,081,833	75,212	3.61	68,563	3.29	6,649	0.32
Idaho Mountain Valleys	Core	2,110,685	177,006	8.39	164,286	7.78	12,720	0.60
	Important	1,602,894	135,004	8.42	120,881	7.54	14,124	0.88
	Total	3,713,578	312,010	8.40	285,166	7.68	26,844	0.72
Idaho Southern	Core	856,442	47,207	5.51	38,352	4.48	8,855	1.03
	Important	1,225,756	70,727	5.77	51,073	4.17	19,654	1.60
	Total	2,082,198	117,934	5.66	89,425	4.29	28,509	1.37
Idaho West Owyhee	Core	2,034,057	133,498	6.56	130,801	6.43	2,697	0.13
	Important	609,354	50,345	8.26	45,616	7.49	4,729	0.78
	Total	2,643,412	183,843	6.95	176,417	6.67	7,425	0.28
All Conservation Areas	CHZ and IHZ	10,521,022	688,999	6.55	619,571	5.89	69,428	0.66

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## **Exhibit 1**

### **Ownership by Sage-Grouse Habitat Zone**



## **PART I. CONSERVATION MEASURES FOR ACTIVITIES ON STATE ENDOWMENT TRUST LANDS**

For proposed activities by third parties on endowment lands in Core and Important Habitat Zones, IDL will implement CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements.

Also, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to conserve sage-grouse habitat. In addition, IDL will include an analysis of sage-grouse habitat impacts when considering land transactions that are located in Core or Important Habitat Zones.

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one size fits all” set of CMs. Science and technology also change over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by applicants or lessees must provide equal or better results than the CMs described below. Site-specific management plans will be reviewed and approved by the appropriate IDL staff. When anticipated results are uncertain, IDL will confer with the Idaho Department of Fish and Game (IDFG) prior to approving any site-specific management plan.

### **8. Fire Prevention on Endowment Land**

IDL is committed to conserving habitat for the sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire preparedness and prevention measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

In Idaho, there are 619,571 acres of endowment lands located within Core and Important Habitat Zones. These lands contain about 82,000 Animal Unit Months (AUMs) of leased forage. As a primary threat wildland fire has the potential to significantly impact endowment rangelands located in Core and Important Habitat Zones. Between 2009 and 2014, more than 19,000 acres of Core and Important sage-grouse habitat burned on endowment rangelands due to wildland fire. Based on historical averages, approximately 3,200 acres of endowment rangelands are expected to burn each year within Core and Important Habitat Zones with significant impacts to grazing lessees and endowment beneficiaries.

During the 2014 fire season, 2,957 acres of Core Habitat Zone burned on endowment rangelands making 470 AUMs of livestock forage unavailable for one to two years. In 2014, Core habitat restoration costs on 2,088 acres of those endowment lands totaled nearly \$45,000. Left unaddressed, the primary threat of wildland fire within Core and Important Habitat Zones on endowment rangelands is expected to continue at the same rate.



The following CMs will be incorporated as stipulations for any authorizing documents, (except livestock grazing which is addressed separately under item 16), issued within Core and Important sage-grouse habitat:

**8.1.** Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, RFPAs, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

**8.2.** Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.

**8.3.** Authorized parties will ensure that field personnel are aware of:

- a. fire prevention and emergency response plan,
- b. evacuation routes and procedures,
- c. designated safety meeting places, and
- d. emergency shutdown procedures.

**8.4.** Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

## **9. Wildfire Suppression on Endowment Land**

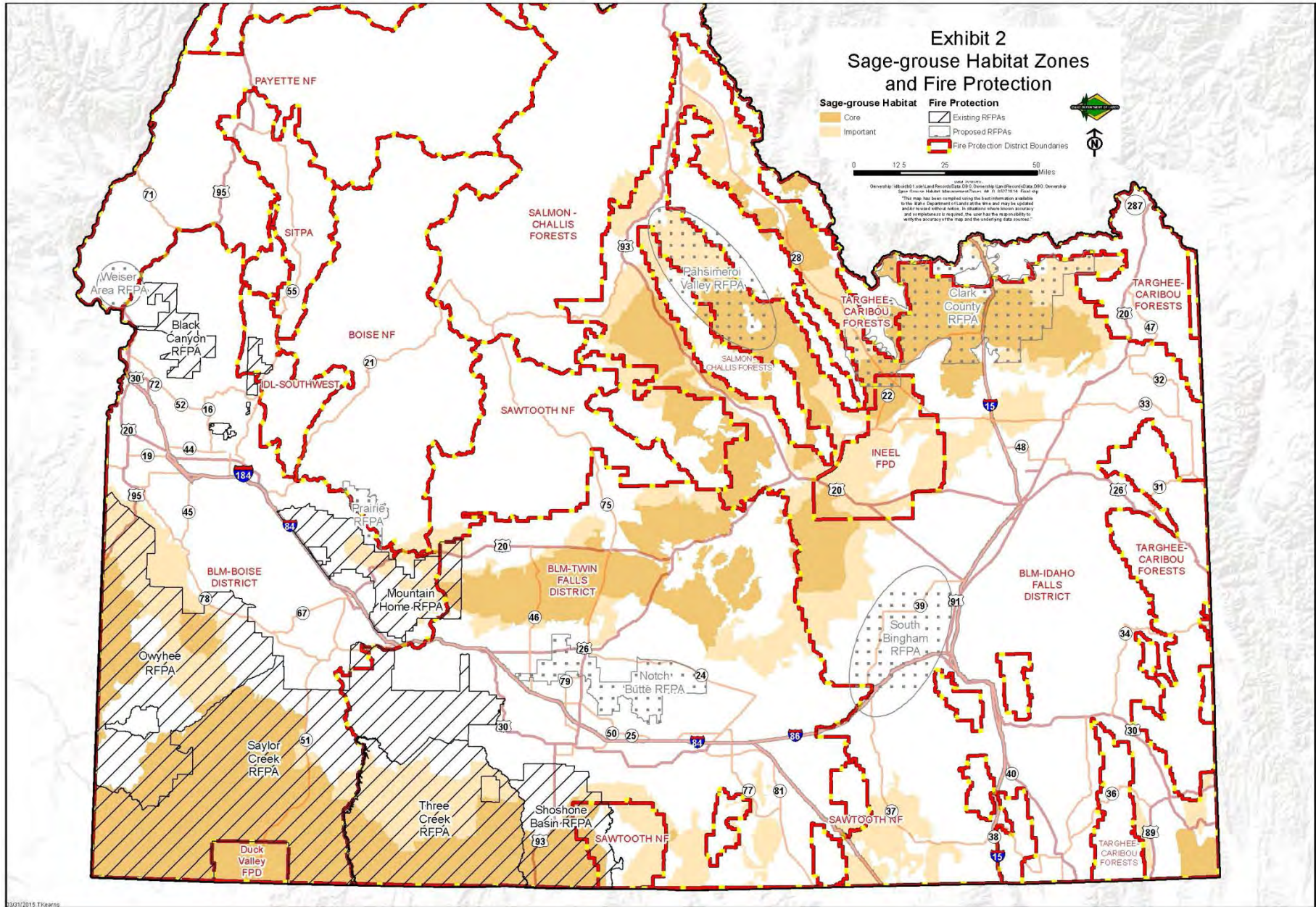
Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations). Exhibit 2 displays the IDL, federal, and active and proposed rangeland fire protection association boundaries within the sage-grouse landscape.

IDL is committed to conserving habitat for sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire suppression guidance that is complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important Habitat Zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

## Exhibit 2

### Sage-Grouse Habitat Zone and Fire Protection



When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasive Assessment Team (BLM/FS FIAT) plans. For extended attack fires involving endowment rangelands, in or near Core or Important Habitat Zones:

**9.1.** IDL may assign a Resource Advisor (primarily a Resource Specialist-Range) to provide local information regarding sage-grouse habitat during the in-brief and continually throughout the incident. The Resource Advisor will also be engaged with the incident to assess sage-grouse habitat that may be affected by the fire or suppression activities.

## **10. Fuels Management on Endowment Land**

Wildfires in a rangeland ecosystem can grow quickly and affect hundreds of thousands of acres of sage-grouse habitat in a matter of days or within a single burning period. Due to rapid fire spread, the potentially long response times due to remoteness, and limited sites for firefighters to establish safe anchor points to engage wildfires in some of these areas, these fires can be difficult to manage. Additionally, only one of the three legs of the fire triangle (fuel, oxygen, and heat) can be modified, which is fuel, making fuels management key in wildfire control in sage-grouse habitat.

**10.1.** Unless otherwise specified as part of a land use plan, IDL will consider the full array of fuels management treatment types (prescribed fire, mechanical, chemical, and biological) when implementing CMs and BMPs on endowment rangelands.

**10.2.** Where applicable IDL will design fuels treatment objectives on endowment rangelands to protect existing Core and Important Habitat Zones, modify fire behavior, restore native plants, and create landscape patterns to benefit sage-grouse habitat, as resources permit and consistent with the BLM/FS FIAT plans .

**10.3.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to use proper livestock management and targeted grazing as a treatment to reduce vegetative fire fuels, reduce annual grass densities, and to enhance and protect Core and Important Habitat Zones.

**10.4.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit. Examples of IDL cooperative efforts include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**10.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically implement brush management treatments and rehabilitate annual grasslands to reduce vegetative fire fuels within and to protect Core and Important Habitat Zones, as resources permit.

**10.6.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically establish green and brown strip fuel breaks along existing roads and other disturbances; identify and target higher-risk roads for fuel break construction and maintenance based on fire history maps; and use properly managed and targeted livestock grazing to create fuel break patterns that protect Core and Important Habitat Zones. Fuel breaks to include annual monitoring and maintenance. Examples of IDL cooperative efforts include:

- a. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015)*
- b. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014)*
- c. *Jarbidge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA)*

**10.7.** IDL will authorize private, state and federal contractor fuel break construction across IDL managed land.

**10.8.** IDL will prioritize fuel management treatments within Key Areas (large contiguous blocks of endowment land within Core and Important habitat that USFWS has identified as a priority for conservation efforts). Fuel management treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fuel management treatments within the Key Areas.

## **11. Wildfire Restoration and Rehabilitation on Endowment Land**

Wildfire restoration/rehabilitation is essential for conserving sage-grouse habitat. The increasing frequency and intensity of rangeland fire poses a significant threat to habitat as well as increasing opportunity for the accelerated invasion of non-native annual grasses, in particular cheatgrass and medusahead rye, and the spread of pinyon-juniper across the sagebrush-steppe ecosystem. By quickly taking action to restore/rehabilitate following wildfire, this opportunity is decreased as we increase the likelihood of desired vegetation reestablishing.

**11.1.** IDL will form partnerships, agreements, and cooperate with lessees, working groups, and other federal, state, county and private partners in post-fire restoration treatments of Core and Important Habitat Zones on state endowment trust rangelands damaged by fire. Restoration and rehabilitation efforts will be consistent with the BLM/FS FIAT plans.

- a. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015)*

**11.2** IDL will prioritize fire restoration/rehabilitation treatments within Key Areas. Fire restoration/rehabilitation treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from

Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fire restoration/rehabilitation treatments within the Key Areas.

## **12. Habitat Restoration and Vegetation Management on Endowment Land**

**12.1.** As resources permit, IDL will give high priority to vegetation restoration, rehabilitation or manipulation projects in Core and Important habitat within the Key Areas first, followed by those areas not within the Key Areas, consistent with the BLM/FS FIAT plans that include:

- a. Cooperative efforts that may improve Core and Important Habitat Zones over multiple ownerships.
- b. Projects that may provide connectivity between suitable habitats or expand existing good quality habitat within Core and Important Habitat Zones on endowment rangelands.
- c. Sites where environmental variables contribute to improved chances for project success.
- d. Projects that address conifer encroachment within Core and Important Habitat Zones. Priority for treatment as Phase 1 (<10 percent conifer cover), Phase 2 (10-30 percent), and Phase 3 (>30 percent).
- e. Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial, or other techniques to re-establish desired species.
- f. Re-establish sagebrush cover on recently burned native areas within suitable Core and Important Habitat Zones, with consideration to endowment rangeland forage productivity, local needs and conditions.

**12.2.** Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.

**12.3.** Use available plant species based on their adaptation to the site when developing seed mixes.

**12.4.** Use post-treatment control to reduce annual grass densities, invasive and noxious weed competition through targeted livestock grazing and herbicide applications.

**12.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit.

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**12.6** IDL will prioritize habitat restoration treatments within Key Areas. Habitat restoration treatments within Key Areas will incorporate sage-grouse seasonal habitat

guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any habitat restoration treatments within the Key Areas.

### **13. Invasive Plant Species on Endowment Land**

Exotic annual grasses and other invasive plants alter habitat suitability for sage-grouse by reducing or eliminating native forbs and grasses essential for food and cover. Exotic annual grasses, in particular cheatgrass and medusahead rye, also facilitate an increase in mean fire frequency. For endowment lands, the following CMs for invasive plant species will be applied through lease stipulations or other recordable instrument stipulations.

**13.1.** Vehicles and equipment operated by IDL or lessees that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.

**13.2.** Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by the lessee and the lessor or a designated agent.

**13.3.** Reclamation activities will include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) will be certified weed free by the appropriate federal or State of Idaho agency.

**13.4.** Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

### **14. Infrastructure Development / Lands and Realty on Endowment Land**

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.)*

*Infrastructure related to small-scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Infrastructure development on endowment lands can vary from minor road or fencing construction to utility-scale renewable energy facilities including wind farms, geothermal power plants, and

solar power plants. These developments regardless of their size can have a measurable and substantial impact on sage-grouse and their habitat. All infrastructure developments require some form of road construction to deliver materials for construction and perform regular maintenance to facilities. These roads are often graded gravel roads and are maintained periodically for easy access to sites. Other smaller roads are developed for access to geothermal well pads, wind turbines, or pipelines. Roads may also be necessary for third-party access to private or federal lands.

Transmission lines must be built in order to harness power from wind turbines, geothermal sites, or solar sites and to provide for grid reliability. Additionally, fences are often erected to protect facilities such as turbines or substations from vandalism. These features all have the potential to directly, or indirectly, affect sage-grouse at multiple scales and over time.

The potential for renewable energy development to occur on endowment lands located in Core and Important Habitat Zones is very low. However, any proposed development will be required to comply with the CMs identified in the following sections. These same CMs will also be included as stipulations in rights-of-way, when IDL authorizes parties to access other lands by using endowment lands.

#### **14.1. Surface Use and Timing**

**14.1.1.** Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by the IDFG recommends otherwise.

**14.1.2.** No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones. Livestock grazing is not considered surface occupancy.

**14.1.3.** During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.

**14.1.4.** Major construction and maintenance activity shall be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **14.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.



### **14.3. Fencing**

Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.

**14.3.1.** New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011).

Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

**14.3.2.** As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

### **14.4. Water Supply Structures**

**14.4.1.** New or modified spring developments (including pipelines) shall be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.

**14.4.2.** As an exception to 14.4.4.1., on projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the lessee to treat these tanks for mosquito species that carry West Nile Virus.

**14.4.3** The construction of new ponds or reservoirs by authorized parties will be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse.

**14.4.4.** Wildlife escape ramps in new and existing water troughs and open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

### **14.5. Constructed Improvements**

**14.5.1.** Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

**14.5.2.** Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations

**14.5.3.** Surface disturbances will be clustered in order to limit surface occupancy.

**14.5.4.** New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.

**14.5.5.** Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.

**14.5.6.** New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.

**14.5.7.** Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**14.6. Site Reclamation** (non-fire related rehabilitation/reclamation)

**14.6.1.** Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.

**14.6.2.** Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.

**14.6.3.** Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **Transition Lands/Land Tenure**

IDL considers opportunities to sell, purchase, develop, or exchange endowment lands to meet its constitutional mandate to maximize long term returns to the owning beneficiaries by diversifying land holdings, maximizing the rate of return to the trusts, improving public access to endowment lands, and consolidating endowment lands for more efficient management. In order to accomplish these objectives, IDL must be able to maintain the flexibility to move lands into and out of the identified habitat zones. Lands identified for potential ownership changes are termed “transition lands.”

The ultimate decision authority for determining to auction or exchange endowment lands lies with the Land Board. IDL commits to providing the Land Board relevant data and analysis to inform them on potential impacts to sage-grouse habitat of land transitions within Core or Important sage-grouse Habitat Zones through the following CMs.

**14.7.** Any tract proposed for sale or exchange within Core or Important Habitat Zones will include an analysis on the impact to sage-grouse habitat resulting from the transition. This analysis will include, but not limited to:

- Acres in and percentages of Core and Important Habitat Zones.
- Quality/type of habitat (number of leks, breeding, nesting, early brood rearing, summer/late brood rearing, fall, winter).
- Any knowledge of new owner’s implementation/commitment for sage-grouse conservation measures to estimate overall impact to sage-grouse habitat conservation.
- IDFG data and review comments.

## **14.8 BLM Land Exchanges**

IDL adopts a general strategy aimed at reducing endowment ownership of Key Habitat within Core Habitat Zones through completion of land exchanges with the BLM. This strategy would provide the greatest levels of certainty for conservation of core sage-grouse habitat.

Once endowment lands have been proposed to be included in a formal land exchange with the submission and acceptance of an Agreement to Initiate (ATI) with the BLM, the IDL, with Land Board concurrence, would commit to up to a three-year deferral on leasing of those lands for mineral development in order to accomplish the exchange.

Key habitat areas within Core Habitat Zones within the endowment trust estate would be prioritized for exchange. In exchange for those endowment lands, IDL would prioritize BLM lands and/or minerals with the following characteristics for acquisition consistent with its duty to maximize revenue over the long term in accordance with Article IX, Section 8 of the Idaho Constitution: 1) lands and minerals located outside of Core and Important Habitat Zones, 2) lands with oil and gas resource development potential, 3) lands with non-native vegetation (previously seeded crested wheatgrass), and 4) lands that block up existing IDL ownership, not necessarily limited to the current disposal lists in the respective Resource Management Plans.

Given the long timeframes that can be associated with federal land exchanges, IDL proposes that the Department of Interior consider adopting a streamlined exchange process, similar to authorities contained in the 2014 Farm Bill for the U.S. Department of Agriculture. Land exchanges that provide a net benefit to conservation of core sage grouse habitat, should be considered for a categorical exclusion under the National Environmental Policy Act (NEPA).

#### **14.9. Owyhee Land Exchange**

In December, 2008 the BLM and IDL entered into an Agreement to Initiate Land Exchange. IDL's objectives for parcel acquisition selection include: improved range (crested wheatgrass seedings), parcels outside Core or Important sage-grouse habitat or bighorn sheep habitat, parcels that block up current IDL ownership and/or provide legal access to existing ownership, and parcels that may have Higher and Better Use (HBU) potential. Objectives for disposition of IDL lands include: wholly within or adjacent to designated wilderness, scattered parcels with no legal access and no management control, other scattered IDL parcels within large blocks of BLM ownership. Acreage in the current version of the exchange includes approximately 28,000 acres of IDL ownership and 32,000 acres of BLM ownership. Parcels in the exchange are displayed in Appendix D.

**14.10** New acquisitions of endowment lands within the Core and Important Habitat Zones would be discouraged; however, if minor amounts of lands were acquired, they would be managed according to the IDL sage-grouse CMs.

### **15. Mineral Leasing on Endowment Land**

For all mineral leasing activities on endowment lands, CMs for the sage-grouse will be applied through lease stipulations or other recordable instrument stipulations that are enforceable. Mineral leasing can be slightly more complex due to the potential for split estate scenarios, where the surface owner is different than the mineral estate owner. In these cases, IDL would still include CMs as lease stipulations when leasing involves only the mineral estate (where the endowed beneficiary is not the surface owner).

#### **15.1. Fluid Mineral Leasing on Endowment Land**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse Habitat Zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-

specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist. For endowment lands, the following oil and gas lease stipulations will be included in the lease document and advertised prior to lease auction on tracts within Core and Important Habitat Zones.

#### **15.1.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **15.1.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

#### **15.1.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

#### **15.1.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **15.1.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances will be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **15.1.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **15.2. Mining Activities on Endowment Lands**

Mineral leasing and any subsequent mining activities on state endowment trust lands require authorization and oversight by IDL. IDL uses written procedures, including mineral lease pre-auction inspections, quarterly or yearly mineral lease inspections, and mineral lease enforcement to ensure compliance by authorized parties. The following conservation measures will be incorporated into the IDL mineral leases that are in Core and Important sage-grouse Habitat Zones.

### **15.2.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important Habitat Zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations, project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **15.2.2. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before sunset to 2 hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **15.2.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

#### **15.2.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **15.2.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances may be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within 1km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within 3 km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **15.2.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **16. Range Management/Livestock Grazing on Endowment Land**

IDL recognizes that healthy rangelands provide a basic foundation for productive sage-grouse habitat. Conservation and improvement of sage-grouse habitat is consistent with long-term



grazing management systems that support conditions or trends toward healthy rangelands. Within the 2006 Conservation Plan for the Greater Sage-Grouse in Idaho (“2006 Idaho Plan”), IDL agreed to take measures that protect or improve important and critical wildlife habitat, subject to the fundamental mission of IDL to support endowment beneficiaries. Though the impact of livestock grazing to rangelands is recognized as a secondary threat to sage-grouse habitat in Idaho, roughly 619,571 surface acres or 44 percent of endowment rangelands are within Core and Important Habitat Zones. IDL identifies proper livestock grazing as a tool that could benefit sage-grouse habitats by taking into consideration flexibility and site-specific management opportunities.

Identified within the 2006 Idaho Plan, livestock management practices are not stand-alone actions. Management activities should be considered in combinations best characterized by a complete and effective grazing program and that also considers key sage-grouse conservation needs. IDL further recognizes that opportunities exist for state and federal agencies, grazing lessees and university researchers to collaborate on efforts to modify current conditions and needed management actions in terms of livestock grazing in sage-grouse habitats throughout southern Idaho. IDL will administer endowment rangelands and livestock grazing leases in Core and Important Habitat Zones with lease stipulations that are drawn from, in part, the CMs specified within the 2006 Idaho Plan as well as more recent IDFG recommendations.

Issue Addressed	Conservation Measure(s)
Livestock management and leks.	<ol style="list-style-type: none"> <li>1. Use lek route or other relevant information to identify leks where the placement of sheep camps, bed grounds, herding or related activities is repeatedly disturbing displaying birds on active leks. Dates of concern are from March 15 through May 1 in lower elevation with habitats and March 25 through May 15 in higher elevation habitats. Once such leks are identified, IDL will work closely with sheep ranchers, Local Working Groups and/or IDFG to identify mutually agreed upon alternative sites or herding routes that eliminate or reduce disturbance. In selecting such alternative sites/routes, focus on areas away from leks and that do not provide breeding habitat characteristics, where feasible. If such lek-specific CMs cannot be developed (due to time or logistical constraints), domestic sheep grazing activities described above will be avoided within the lesser of 1 km (0.62 mi) or direct line of sight of any such lek during the lekking periods.</li> <li>2. IDL will provide maps to lessees to ensure that sheep operators and herders are aware of the location of possible or occupied leks.</li> </ol>
Livestock management and late brood rearing habitat.	<ol style="list-style-type: none"> <li>1. Due to the preference of forbs by domestic sheep, manage sheep allotments using grazing management techniques that promote and maintain a diversity of desirable annual and perennial forbs. Suggestions include:               <ol style="list-style-type: none"> <li>A. Alternate or rotate areas for spring turnout.</li> <li>B. Promote light, once-over use of vegetation, as opposed to repeated use during the same season</li> </ol> </li> </ol>

Issue Addressed	Conservation Measure(s)
	<p>by the same band or successive bands of sheep.</p> <p>C. Ensure that permittees, foremen, herders and sheep camp tenders are informed of management and movement requirements, such as related to the avoidance of recent burns, burned area rehabilitation seedings or other restoration sites.</p> <p>D. Employ open (loose) herding of sheep as opposed to tightly bunched sheep.</p> <p>2. Manage grazing of riparian areas, meadows, springs, and seeps in a manner that promotes vegetation structure and composition appropriate to the site. In some cases enclosure fencing may be a viable option. However, in some cases, (e.g., enclosed meadows) the availability and quality of herbaceous species may be improved by periodic grazing use of enclosure and should be considered in the grazing management program.</p> <p>3. In agricultural fields where sage-grouse use has been documented or is likely, willing lessees may wish to avoid or limit use of alfalfa by livestock after the last cutting, to provide residual alfalfa for use by sage-grouse broods.</p>
Livestock management during periods of drought.	<p>1. In sage-grouse nesting and brood-rearing habitats, adjust livestock use (season, utilization, stocking, intensity, and/or duration) during drought to minimize the additional stress placed on herbaceous species. This is anticipated to reduce impacts on perennial herbaceous cover, plant species diversity and plant vigor. IDL will cooperate with lessees and federal partners as needed.</p> <p>2. IDL will continue to foster the coordination of drought management activities and outreach through the Idaho Rangeland Drought Task Force committee.</p>
Placement of salt and mineral supplements.	<p>1. When using salt or mineral supplements: a) place them in existing disturbed sites, areas with reduced sagebrush cover, seedings, or cheatgrass sites (for example) to reduce impacts to sage-grouse breeding habitat, b) where feasible, use salts or mineral supplements to improve management of livestock for the benefit of sage-grouse habitat.</p>
Placement of fences and other structures.	<p>1. Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.</p> <p>2. New and existing wire fence segments constructed by</p>

Issue Addressed	Conservation Measure(s)
	<p>authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.</p> <p>3. Where feasible, IDL will recommend placement of new fences and structures with consideration of their impact on sage-grouse. In general, avoid constructing new fences within 1 km (0.62 mi) of occupied leks (adopted from Connelly et al. 2000b). Where feasible, place new, taller structures such as corrals, loading facilities, water storage tanks, windmills etc., as far as possible from occupied leks to reduce opportunities for perching raptors. Careful consideration, based on local conditions, will also be given to the placement of new fences or structures near other important seasonal habitats (winter-use areas, movement corridors etc.). In order to reduce potential impacts, fence markers will be used to mitigate mortality within areas identified by IDL, lessees or cooperative partners.</p>
Design and placement of water developments.	<p>1. IDL and lessees will cooperate on site-specific new spring developments in sage-grouse habitat. Spring developments will be designed to maintain or enhance the free-flowing characteristics of springs and wet meadows by the use of float valves on troughs or other features where feasible. Retrofit existing water developments during normal maintenance activities to maintain or enhance lentic, riparian properties and minimize annual maintenance.</p> <p>2. IDL and lessees will cooperate to ensure that new and existing livestock troughs and open water storage tanks are fitted with wildlife escape ramps/ladders to facilitate the use of and escape from troughs by sage-grouse and other wildlife. Floating boards or similar objects will not be used as these are too unstable and are ineffective. IDL and lessees will cooperate to ensure that USDA-NRCS design requirements for wildlife escape ramps are followed when installed.</p>

## 17. Wild Horses and Burros

No direct measures, this item included to maintain sequential numbering system utilized for the BLM *Administrative Draft Proposed Plan*.

## 18. Travel Management

**18.1.** On site traffic should be reduced by use of telemetry and other remote sensing tools.

**18.2.** During operations, existing roads or trails should be employed and activities should be contained as close to existing roads and trails as feasible.

**18.3.** Roads should be designed by authorized parties to an appropriate minimum standard necessary to accommodate their intended purpose.

**18.4.** Road crossings should be constructed by authorized parties at right angles to ephemeral drainages and stream crossings.

## **19. Recreation**

Recreation has been determined to not be a primary threat to sage-grouse in Idaho, but the measures listed above in Sections 13 and 14 will also apply to recreation leases.

## **20. Implementation and Monitoring**

Implementation of the CMs through lease/permit/easement stipulation will be incorporated into existing lease/permit/easement issuance procedures. A copy of the applicable CMs will be provided to all interested applicants for a lease, permit or easement on endowment lands located in Core or Important Habitat Zones, so the applicant is informed of the expected requirements when entering the application process. The CMs will be incorporated into the authorizing document either directly or by separate addendum. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs required through lease/permit/easement stipulation will be incorporated into existing lease/permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for land transactions will be amended to include an analysis of the impacts on sage-grouse when the transaction includes transition lands within Core or Important Habitat Zones. The results of this analysis will be included in the information provided to the Land Board for their review of the proposed transaction.

## **PART II. CONSERVATION MEASURES FOR IDL ACTIVITIES IN THE FIRE PROGRAM AND FOR REGULATED ACTIVITIES IN THE OIL & GAS AND MINERALS PROGRAMS**

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

In addition, IDL has roles and responsibilities in its fire program where CMs will be implemented to address conservation of sage-grouse habitat in Core and Important Habitat Zones.

### **8. Wildfire Preparedness/Prevention**

IDL is committed to conserving habitat for the greater sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed the following wildfire preparedness and prevention conservation measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

**8.1.** IDL will continue to support the ongoing operations of taxing and non-taxing fire districts in Idaho, when requested and as available, through equipment acquired through the Federal Excess Personal Property (FEPP) program and Firefighter Property (FFP) program, and through Volunteer Fire Assistance (VFA) grant fund allocations.

**8.2.** IDL will continue to support the formation and ongoing operations of RFPAs through the IDL South Idaho Fire Program Liaison. This position is the point of contact for any needs or issues raised by RFPAs and their cooperators. The position coordinates information needs on an annual cycle as well as facilitating an annual meeting for all RFPA Board of Directors and their cooperators, held following fire season.

**8.3.** IDL will continue to support, as funding is available, the formation and operation of RFPAs through start-up funding that provides personal protective equipment, radios, firefighting equipment, and training materials.

**8.4.** IDL will continue to utilize burning permits (per Idaho Code 38-115, Rule IDAPA 20.04.01.060) during the designated closed fire season as a fire prevention and control tool. Burning permits acquaint the permit holder with the laws and requirements for safe burning. During times of critical fire hazard, all burning may be stopped by the suspension of burning permits. Closed fire season provides for public safety and the protection of land resources by ensuring that all burning operations which may occur during periods of high

fire danger are conducted under safe conditions and in such manner that the danger of uncontrolled fire spread is minimized.

**8.5.** IDL will continue to participate in the Idaho Fire Restrictions Plan (per Idaho Code 38-115, Rule IDAPA 20.04.01.060; IDAPA 20.04.01.070; IDAPA 20.04.01.090; and IDAPA 20.04.01.120), which is an interagency document that outlines coordination efforts regarding fire restrictions and closures. The purpose of fire restrictions is to reduce the risk of human-caused fires during unusually high fire danger and/or burning conditions. An interagency approach for initiating restrictions or closures helps provide consistency among the land management partners, while defining the restriction boundaries so they are easily distinguishable to the public.

## **9. Wildfire Suppression**

Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations).

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important Habitat Zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasive Assessment Team (BLM/FS FIAT) plans.

## **10. Fuels Management**

IDL does not have general regulatory authority over fuels management on non-state rangelands.

## **11. Wildfire Restoration and Rehabilitation**

IDL does not have general regulatory authority over wildfire restoration and rehabilitation on non-state rangelands.

## **12. Habitat Restoration and Vegetation Management**

IDL has limited authority to regulate habitat restoration and vegetation management, but will address vegetation management through voluntary BMPs and permit stipulations. See section 15.

### **13. Invasive Plant Species**

IDL has limited authority to regulate invasive species, but will address invasive species management through voluntary BMPs and permit stipulations. See Section 15.

### **14. Infrastructure Development**

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.)*

*Infrastructure related to small-scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one size fits all” set of CMs. Science and technology also change over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by authorized parties should provide equal or better results than the CMs described below. Site specific management plans will be reviewed by appropriate IDL staff and the IDFG prior to a final recommendation from IDL.

IDL has limited authority to regulate infrastructure development, but will address infrastructure development through voluntary BMPs and permit stipulations. See Section 15.

### **15. Minerals**

#### **15.1. Fluid Minerals**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse Habitat Zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods

and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist.

### **15.1.2. Oil and Gas Activities – Regulatory Compliance**

The IDL is the administrative arm of the Idaho Oil and Gas Conservation Commission (Commission) pursuant to § 47-319(2) which states that the commission is authorized to; "...regulate the exploration for and production of oil and gas, prevent waste of oil and gas and to protect correlative rights, and otherwise to administer and enforce this act. It has jurisdiction over all persons and property necessary for such purposes. In the event of a conflict, the duty to prevent waste is paramount." Under this authority, § 47-321 provides for the commission to establish spacing units which are legally described boundaries overlaying the resource and set a fixed acreage per well, with the well located in the center of the boundary. § 47-321(b) states that these spacing units are established by the Commission in order to; "...result in the efficient and economical development of the pool as a whole..."

At this time for conventional drilling techniques, the default spacing, set by the Commission, is 640 acres for gas and 40 acres for oil. As surface use restrictions grow, the Commission could see requests to modify the default spacing unit in order to limit surface disturbance. As the Commission receives these requests, IDL will provide sage-grouse habitat data so that the Commission, if it chooses, can incorporate such information into its decision establishing a new spacing unit.

The BMPs listed below will be provided to all applicants seeking permit issuance for operations in Core or Important sage-grouse Habitat Zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a stipulation in the permit.

#### **15.1.2.1. Oil and Gas Activities**

The following BMPs will be provided to all operators making application to drill a well, treat a well, or conduct seismic explorations in Core or Important Habitat Zones.

##### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.



- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized during operations will be cleaned before entry to prevent the spread of seeds and propagules. The equipment will also be cleaned at the conclusion of all field activities.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

#### **c. Surface Use and Timing**

- i. Conventional well activity and exploration will not be conducted within 0.62 miles of an occupied lek.

- ii. All pipelines and collector lines will be emplaced utilizing horizontal boring methods with a minimum setback of 0.62 miles of an occupied lek.
- iii. Construction of pipelines will be in accordance with seasonal stipulations regarding no operations or construction from March to July.
- iv. Planned pipeline maintenance will not be conducted between 6 p.m. to 8 a.m., except in an emergency situation, within 0.62 miles of an occupied lek during the breeding season.
- v. Compressor stations and other vital operations shall be placed a minimum of 0.62 miles from an occupied lek, unless screening or other mitigation is determined to be as protective.

**d. Noise**

- i. Noise from permitted well sites will not exceed a 65db daily average threshold during the lekking season, within 0.62 miles of an occupied lek.
- ii. Noise levels may be exceeded for emergency situations including well control, threats to freshwater resources, and other environmental safety concerns.

**e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

**f. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**g. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## 15.2. Abandoned Mine Lands Program

The Abandoned Mine Lands Program operates on private, federal, and state lands. IDL works with landowners to address safety closures of dangerous mine openings and reclaim areas to protect human health. Reclamation is also performed to improve water quality and wildlife habitat, but public safety projects take precedence. IDL develops and controls these projects, and can incorporate sage-grouse CMs into the projects. Abandoned mine land projects will implement the following BMPs within Core and Important sage-grouse Habitat Zones.

### a. Wildfire Prevention

- i. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- ii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iii. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

### b. Invasive Species

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.
- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are

determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **d. Noise**

Limit noise levels from discretionary activities within Core and Important Habitat Zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes

and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks shall be installed and maintained to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.

- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **15.3. Mining Regulatory Program**

The Mining Regulatory program operates on private, federal, and state lands and covers all dredge and placer mining and surface mining operations. Activities classified as exploration, such as drilling or trenching, only require a notification to IDL. Dredge and placer mining operations over ½ acres require a permit and bond. Surface mining operations that produce materials for immediate or ultimate sale require a reclamation plan and bond. Coordinated reviews with Idaho Department of Environmental Quality, Idaho Department of Water Resources, and IDFG are required for operations that may impact water quality.

The BMPs listed below will be provided to all applicants seeking reclamation plan approval or permit issuance for mining operations in Core or Important sage-grouse Habitat Zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a condition of reclamation plan or permit approval.

To further contribute to conservation of sage-grouse habitat, IDL will also coordinate with IDFG to evaluate existing mines and their potential impact on sage-grouse habitat. The following best management practices will be suggested to these mine operators. IDL will also work with IDFG to develop an informational brochure for new mine operators so they may consider adopting these BMPs into their proposed operations.

#### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land management agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.
- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved/designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.



- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

**c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important Habitat Zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

**d. Noise**

- i. Limit noise levels from discretionary activities within Core and Important Habitat Zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.
- ii. Authorized party will keep noise levels on existing infrastructure within the 0.62 mile buffer to 65 decibels or less.

#### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas identified by the NRCS Fence Collision Risk Tool will be marked using collision diverter markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important Habitat Zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks should be allowed to conserve water resources and efforts should be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be installed and maintained to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed

for access to facilities. Requirements from public utilities will be followed for all installations.

- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Use best available science in concurrence with IDFG to address concerns of towers and other elevated structures as perches for predatory or corvid birds.
- vi. New structures with a height over five feet should not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **16. Range Management/Livestock Grazing**

IDL does not have general regulatory authority over livestock grazing on non-state lands.

## **17. Wild Horses and Burros**

IDL does not have regulatory authority over wild horses and burros.

## **18. Travel Management**

IDL does not have general regulatory authority over travel management on non-state lands.

## **19. Recreation**

IDL does not have general regulatory authority over recreation on non-state lands.

## **20. Implementation and Monitoring**

Implementation of the CMs through voluntary agreement will be incorporated into existing permit procedures. A copy of the applicable CMs will be provided to all applicants for a permit on lands located in Core or Important Habitat Zones. As part of the application, applicants will acknowledge which, if any, CMs they are willing to voluntarily comply with. Those CMs will then be incorporated into the permit as an enforceable stipulation of the permit. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs stipulated in the permit will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for Abandoned Mine Lands projects will be amended to include an assessment of the impact on sage-grouse when the project includes lands within Core or Important Habitat Zones. The results of this assessment will be used to determine the appropriate CMs to be implemented as part of the project.

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## Appendix A

### Glossary

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## Habitat Classifications

**Core Sage-Grouse Habitat:** State of Idaho delineation of strongholds for sage-grouse populations in Idaho. This habitat is the highest priority for conservation efforts and for policies to address primary threats. It includes approximately 65 percent of known active leks and occupied by approximately 73 percent of male sage-grouse counted at leks throughout the Idaho sage-grouse management area.

**General Sage-Grouse habitat:** Occupied (seasonal or year-round) habitat outside of priority habitat. It includes a few active leks and fragmented or marginal habitat, such as two isolated populations of sage-grouse in the East Idaho Uplands and West Central Idaho. These areas have been identified by the BLM in coordination with respective state wildlife agencies.

**Important Sage-Grouse Habitat:** State of Idaho delineation defined as the 75 percent breeding bird density areas. This habitat includes areas of value for migration corridors, connectivity among breeding areas, and long term persistence of each of the two key metapopulations of sage-grouse in Idaho. It includes approximately 25 percent of the known active leks. This habitat is occupied by an estimated 22 percent of sage-grouse males. Captures high quality habitat and populations necessary for providing a management buffer for the core habitat.

**Key Habitat:** State of Idaho delineation of areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year including winter, spring, summer, late brood-rearing, fall, transition sites from winter to spring, spring to summer, and summer/fall to winter. Key habitat may or may not provide adequate nesting, early brood-rearing, and winter cover due to elevation, snow depth, lack of early season forbs, limited herbaceous cover, or small sagebrush patch size.

**Priority Sage-Grouse habitat:** Areas that have been identified as having the highest conservation value to maintaining sustainable sage-grouse populations. These areas would include breeding, late brood-rearing, and winter concentration areas. The BLM has identified these areas in coordination with respective state wildlife agencies.

## Lek Classification

**Lek:** A traditional courtship display area attended by male sage-grouse in or next to sagebrush-dominated habitat. A lek is designated based on observations of two or more male sage-grouse engaged in courtship displays. Subdominant males may display on itinerant courtship display areas during population peaks. Such areas usually fail to become established leks. Therefore, a site where less than five males are observed strutting should be confirmed active for two years before meeting the definition of a lek (Connelly et al. 2000; Connelly et al. 2003, 2004). Each state may have a slightly different definition of lek, active lek, inactive lek, occupied lek, and unoccupied leks. Regional planning will use the appropriate definition provided by the state of interest.

**Lek buffer:** Buffers are calculated from the center (IDFG GPS coordinate) of the lek. Exact lek edges are difficult to define because leks shift and birds move on any given day.

**Lek complex:** A lek or group of leks within 2.5 kilometers (1.5 miles) of each other between which male sage-grouse may interchange from one day to the next. Fidelity to



leks has been well documented. Visits to multiple leks are most common among yearlings and less frequent for adult males, suggesting an age-related period of establishment (Connelly et al. 2004).

**Lek, abandoned:** A lek in otherwise suitable habitat that has not been active for 10 consecutive years. To be designated abandoned, a lek must be inactive (see above criteria) in at least four nonconsecutive courtship display seasons spanning the 10 years. The site of an abandoned lek should be surveyed at least once every 10 years to determine whether it has been reoccupied by sage-grouse.

**Lek, active:** Any lek that has been attended by male sage-grouse during the courtship display season.

**Lek, destroyed:** A formerly active lek site and surrounding sagebrush habitat that has been destroyed and is no longer suitable for sage-grouse breeding.

**Lek, inactive:** Any lek where sufficient data suggests that there was no courtship display activity throughout a lekking season. Absence of strutting grouse during a single visit is insufficient documentation to establish that a lek is inactive. This designation requires documentation of one of the following scenarios:

- An absence of sage-grouse on the lek during at least two ground surveys separated by at least seven days. These surveys must be conducted under ideal conditions (April 1-May 7 or other appropriate date based on local conditions), no precipitation, light or no wind, half-hour before sunrise to one hour after sunrise).
- A ground check of the exact known lek site late in the courtship display season (after April 15) that fails to find any sign (tracks, droppings, feathers) of strutting activity. Data collected by aerial surveys should not be used to designate inactive status as the aerial survey may actually disrupt activities.

**Lek, occupied:** A lek that has been active during at least one strutting season within the prior 10 years. This is the status IDFG recommends for long term decision making.

**Lek, undetermined:** A lek that has not been surveyed to determine status.

**Lek, unoccupied:** A lek that has either been destroyed or abandoned.

## **Habitat Use and Periods**

**Breeding period:** Includes lekking, nesting and early brood-rearing periods, generally March 1 through June 30 (Connelly et al. 2000b).

- *Early brood rearing habitat:* Generally upland sagebrush habitats relatively close to sage-grouse nest sites. These areas are important to broods during the first few weeks after hatching. Forb and insect abundance and diversity are important factors. (See Connelly et al. 2000b)

**Late brood rearing:** This occurs in a variety of habitats used by sage-grouse from late June to early November.

- *Late Brood-rearing habitat:* Includes mesic sagebrush and mixed shrub communities, wet meadows, and riparian habitats, as well as some agricultural lands (e.g., alfalfa fields).

**Lekking period:** This should be determined locally, but approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000 foot elevation may be used as a general distinction.

**Nesting period:** Generally April 1 through June 15.

**Winter concentration periods:** For the purpose of this plan, generally December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology. IDL shall confer with IDFG biologists for local variations.

- *Sage-Grouse winter habitats:* Occupied annually by sage-grouse and provide sufficient sagebrush cover and food to support birds throughout the entire winter (especially periods with above average snow cover).

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Appendix B  
Implementation Plans

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# Land Board's Greater Sage-Grouse Conservation Plan Implementation

*Implementation of the Land Board's Plan is contingent upon the federal government's acceptance and incorporation of the Governor's plan in its final decisions on sage-grouse in Idaho.*

## Part I. Implementation Plan for Endowment Land Activities

The following Implementation Plan (IP) will apply to activities on state endowment trust lands within Core and Important sage-grouse Habitat Zones in response to the Land Board's Greater Sage-Grouse Conservation Plan. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- alternative energy development (solar, wind, and geothermal leases and land use permits);
- oil and gas exploration and development (leases and land use permits);
- mining (minerals leases, land use permits and construction permits);
- grazing (grazing leases, land use permits and construction permits);
- miscellaneous commercial activities (commercial leases, land use permits and construction permits); and
- granting of access through rights-of-way, including easements.

This document also addresses the implementation of fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

### I. Previous Authorizations Granted by IDL

IDL recognizes that written authorization through leases, permits and easements has been granted to third parties for activities on state endowment trust lands within Core and Important Habitat Zones prior to the approval of the IDL Greater Sage-Grouse Conservation Plan. These authorizing documents logically do not contain the conservations measures identified in the Land Board's Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important Habitat Zones.

- Within six months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within Core Habitat Zones. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.
- Within 18 months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within Important Habitat Zones. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.
- Once developed, IDL will mail the instrument modifications to the instrument holders with a cover letter explaining the purpose of the instrument modification and encourage their execution of the document due to the benefits to the greater sage-grouse and their habitat. The letter will identify a 30-day timeframe for their response.
- IDL will follow-up in writing with those instrument holders that do not respond within 30 days, offering them a second opportunity to accept the instrument modification.
- If an instrument holder does not agree to the instrument modification, IDL will attempt to make direct contact with the party to discuss the conservation measures and provide educational and supporting documents that would encourage their participation. In addition, IDL will identify which conservation measures are sticking points and give consideration, on a case-by-case basis, to negotiating conservation measure stipulations and come to an agreement on those measures that are acceptable to the instrument holder. As a fallback measure, IDL would include conservation measures as stipulations in any new authorization following the expiration of the existing authorization.

## **II. Future Authorizations to be Granted by IDL**

For new activities proposed by third parties on state endowment trust lands in Core and Important Habitat Zones and for new instruments generated following the expiration of an instrument that expires after the date of the ROD, IDL will implement conservation measures as enforceable stipulations in authorizing documents such as leases, land use permits, construction permits and rights-of-way.

IDL will develop and implement specific instrument templates that include the appropriate conservation measures as mandatory and enforceable stipulations. As a result, all new authorizations granted by IDL within Core and Important Habitat Zones will contain conservation measures in alignment with the Land Board's Greater Sage-Grouse Conservation Plan. IDL will provide these instrument templates to third parties inquiring about or making application for a proposed activity within a Core and Important habitat zone and explain the significance of these stipulations.

### III. Fire Prevention and Mitigation Measures and Wildfire Suppression Efforts

IDL does not have direct wildfire suppression responsibilities within any greater sage-grouse Core or Important habitats in Idaho. However, IDL does have jurisdictional authority for state lands within greater sage-grouse habitat.

Wildland fire protection for federal, state and private lands within greater sage-grouse habitat in southern Idaho is provided by federal agencies through the **Cooperative Fire Protection and Stafford Act Agreement** and by the cooperative efforts of volunteer RFPAs and fire service organizations (city, county and rural fire departments).

In the interest of promoting conservation efforts of the greater sage-grouse and its habitat under this plan, IDL will:

1. Provide maps to all RFPAs that include the location of any designated Core or Important greater sage-grouse habitat within their RFA boundaries by May 10, 2015 (Beginning date of closed fire season in Idaho as designated in Idaho Code Title 38 Section 115.).
2. On any fire affecting or threatening Important or Core habitat on state or private lands requiring an Incident Management Team (IMT), IDL will assign an IDL line officer to jointly work with the federal protecting agency to develop greater sage-grouse conservation objectives for fire suppression activities that will be incorporated into:
  - a. the Wildland Fire Decision Support System (WFDSS);
  - b. the Leader's Letter of Intent to the team;
  - c. the joint Delegation of Authority; and
  - d. ensure the objectives are fully implemented in daily Incident Action Plans.
3. Conservation objectives will include:
  - a. Incident priorities:
    - i. Firefighter safety
    - ii. Public Safety
    - iii. Improvements
    - iv. Resource Values
      - Sage-grouse Core and Important habitat
      - Other resource and property values (historical, archeological, recreational, aesthetics, livestock, etc.).
  - b. Utilize direct attack as the primary tactic to minimize burned acres in greater sage-grouse Core and Important habitat.
  - c. Accept relatively small acreage, short-term ground disturbance due to heavy equipment use to meet higher objectives.
  - d. Rehabilitation for burned acres will promote reestablishment of greater sage-grouse habitat within or adjacent to Core and Important habitat.
4. IDL will consider and promote fire prevention and mitigation measures including but not limited to:
  - a. Master fuel break systems across all ownerships.
  - b. Proposals to adjust fire restriction boundaries and associated use restrictions in the Idaho Fire Restrictions Plan based on protection of Core and Important greater sage-grouse habitat.



- c. Develop annual grazing plans or targeted grazing practices to reduce fuel loading in locations that would be advantageous as a wildfire control location.

## **Part II. Implementation Plan for IDL's Regulatory and Assistance Activities**

The following Implementation Plan (IP) will apply to regulatory and assistance activities administered by IDL within Core and Important sage-grouse Habitat Zones. The IP was developed in response to the Land Board's Greater Sage-Grouse Conservation Plan. Conservation measures will be voluntary best management practices on private land because IDL does not have the statutory authority within its regulatory or assistance programs to require adoption by authorized parties. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- Dredge and placer mining (exploration notices and permits);
- Surface mining (exploration notices and reclamation plans);
- Oil and gas exploration and development (seismic and drilling permits, spacing requests);
- Abandoned mine land reclamation.

### **I. Previous Authorizations Granted by IDL**

IDL recognizes that written authorizations through permit and plan approvals and contracts have been granted to third parties for activities within Core and Important Habitat Zones prior to the approval of the Land Board's Greater Sage-Grouse Conservation Plan. These authorizing documents do not contain the conservations measures identified in the Land Board's Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important Habitat Zones.
  - No outstanding abandoned mine lands contracts are present in Core and Important sage grouse Habitat Zones.
- Within 6 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within **Core** Habitat Zones. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.
- Within 18 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within Important

Habitat Zones. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.

- If impacts to greater sage-grouse habitat are irreversible, IDL will suggest working within the Idaho Mitigation Framework and utilizing the compensatory mitigation process the State Sage-Grouse Advisory Committee develops.
- Ongoing inspections of these operations will include recommendations that give guidance on how the operators can follow the conservation measures

## **II. Future Authorizations to be Granted by IDL**

IDL will develop an information brochure for oil and gas and mining operators who want to explore or develop minerals in Core and Important habitats.

For new activities proposed in Core and Important Habitat Zones and for amendments to existing approved activities, IDL will forward the applications to IDFG for comments and recommendations.

During the review process, IDL will suggest sage-grouse conservation measures to those mine operators based on:

- Feedback from IDFG
- Sage-grouse conservation measures in the IDL plan
- The specific details of the proposed mine

New abandoned mine land projects in Core and Important habitat will be implemented by IDL in conformance with the IDL Greater Sage-Grouse Conservation Plan. This includes inspections and work performed by IDL staff, as well as those performed by contractors and subcontractors.

As a result, all new authorizations granted by IDL within Core and Important Habitat Zones will include recommendations for conservations measures in alignment with the Land Board's Greater Sage-Grouse Conservation Plan. IDL will work with the operators as needed to implement the conservation measures or to implement voluntary mitigation measures, if needed.

## Appendix C

### Wildfire Protection in Idaho Responsibilities and Funding

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## **Wildfire Protection in Idaho Responsibilities and Funding Model**

### **How is fire response organized in Idaho?**

There are approximately 53.5 million acres of land in Idaho, which is divided into 16 forest protective districts. Two of these districts cover lands protected by the Forest Service and the Bureau of Land Management (BLM), and two are tribal districts. The State of Idaho – the Idaho Department of Lands (IDL) and two timber protective associations – provide direct wildfire protection on approximately 6.3 million acres of private, state and some federal forest lands.

The BLM provides primary wildfire protection on most of the lands that have sage-grouse habitat in Idaho.

Due to the scattered nature of ownership in Idaho, some state and private lands are located within federal protection areas, while some federal lands are located within state protection areas. These are known as “offset acres.” Fire managers assign a relative value to each acre to characterize how easily fires can be ignited and how difficult those fires likely will be to control. Through an “offset agreement” the federal agencies protect approximately 900,000 acres of private and state endowment land around Idaho in exchange for the State of Idaho protecting approximately 800,000 acres of federal land. Generally speaking, forested lands in Idaho are included in the offset agreement and rangelands in Idaho are not included the offset agreement.

More than 200 local and rural fire districts provide structure protection in generally non-urban parts of the state that would otherwise not have structural fire protection.

Five rangeland fire protection associations (RFPAs) assist the BLM in providing initial attack on rangelands in southern Idaho. IDL works closely with the BLM and ranchers to establish RFPAs to enable quick initial attack of range fires. Approximately 230 ranchers in southern Idaho are members of five different RFPAs, and there are six additional areas where ranchers have begun to have conversations about starting new associations. IDL expects at least one more RFPA to be formed before the start of the 2015 fire season. Continued support of RFPAs is a key part of the IDL Sage Grouse Conservation Plan. The RFPAs are volunteer initial attack organizations and are not intended to participate in extended attack situations.

Page 4 of Appendix C shows a 2014 map of forest protection district boundaries and current RFPA boundaries in Idaho.

### **Funding Fire Suppression in Idaho**

Fire protection funding is grouped into two categories – preparedness and suppression.

- Preparedness: The first is preparedness, providing resources to be ready in advance of an actual fire. This includes hiring firefighters, ensuring they have the necessary training, tools, and supplies, and purchasing or leasing equipment such as fire engines. In FY14 IDL spent approximately \$11 million in preparedness costs.

Preparedness on state-protected lands is funded by a combination of assessments levied on parties who own forested land, federal funds, and the State General Fund.

The forest land assessment is 60 cents per acre with a surcharge for forested parcels with structures. The IDL, in its role as the owner of endowment lands, contributes to preparedness expenses, just like private forest landowners. In FY14 IDL contributed 60 cents per acre on 974,312 endowment acres that receive protection from the fire management function of IDL, for a total of \$584,587.

In recognition that the value Idahoans place on forests is not limited to harvestable timber, Idaho Code spreads the costs of protection beyond timber. While still requiring forest landowners to provide protection, the law limits the potential liability accruing to the landowner by establishing maximum protection assessments and committing general fund tax revenue to cover expenses over that amount.

- **Suppression:** The second component of wildfire protection is suppression. There is a stable source of funding to pay wildfire suppression costs on lands protected by the State of Idaho. When personnel and equipment are dispatched to a fire managed by the State of Idaho, payment for resources assigned to the fire is made from the General Fund through deficiency warrant authority granted by the Idaho Legislature to the State Board of Land Commissioners. Contracts for aircraft also are charged to deficiency warrants. Deficiency warrant authority allows IDL to spend money to promptly suppress wildfires. Deficiency warrants have been used since at least the early 1970s. When the Idaho Legislature convenes in January it reviews the suppression bills incurred during the previous and current fiscal years, and appropriates funds to pay for the expenditures.

The 10-year average of suppression costs on lands protected by the State of Idaho, including the 2014 fire season, is approximately \$10.5 million. The 10-year average fire size on lands protected by the State of Idaho, including the 2014 fire season, is approximately 19,000 acres. In FY14, IDL employed 261 permanent employees and 202 seasonal employees. Fifty-five percent of IDL FY14 permanent employees worked in a forestry and fire capacity, and during fire season the total percentage of permanent employees contributing to IDL fire duties expands because many members of staff who are not categorized as “fire” help in fire efforts. These staff members are part of fiscal, GIS, operational leadership, administrative staff, and executive staff. Sixty percent of the IDL FY14 seasonal workforce worked in forestry and fire (38 percent in fire).

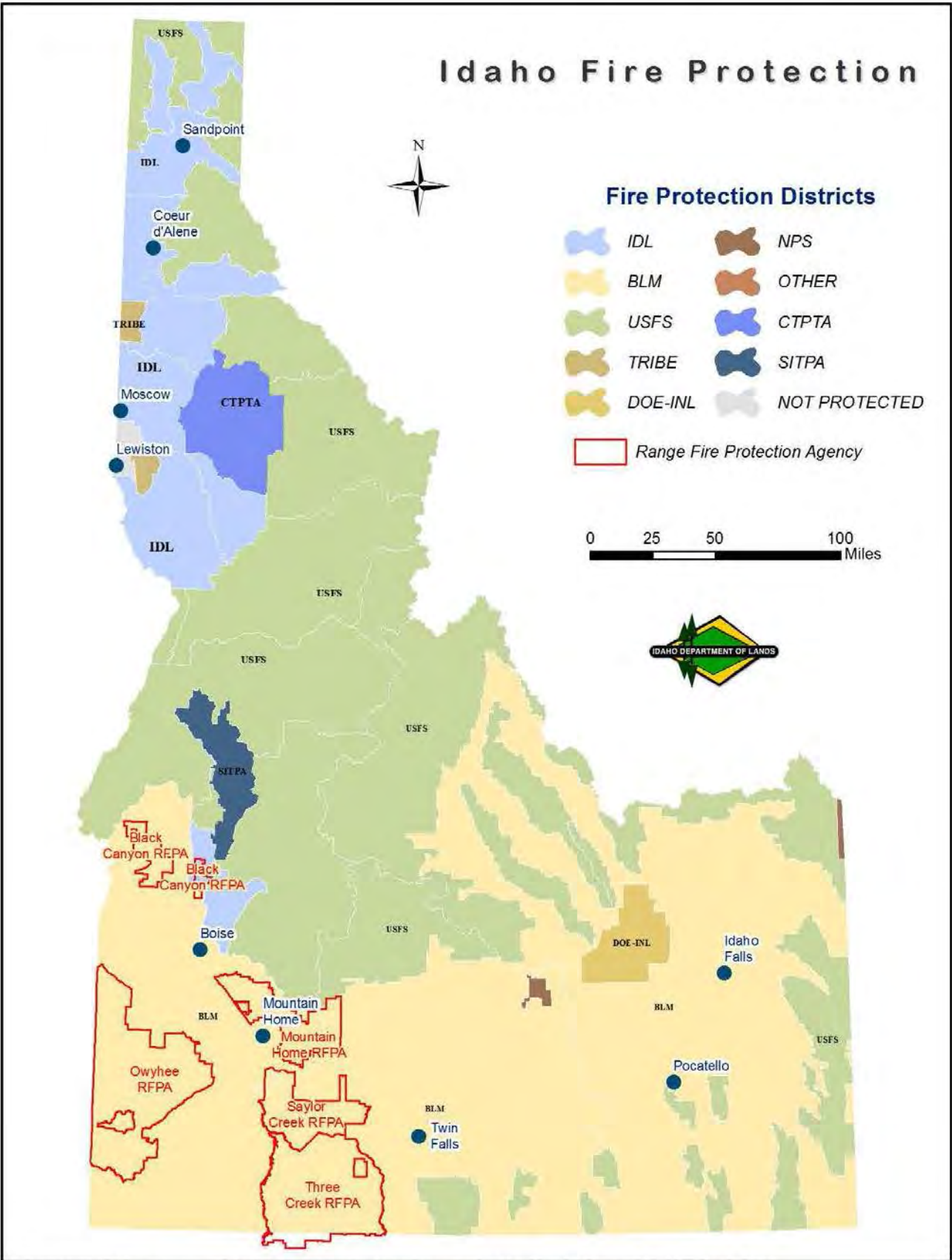
***If a fire starts on forest land in Idaho***, regardless of ownership (federal, state, or private), the protection agency (Forest Service, BLM or IDL) is responsible for paying the suppression bill, not the owner of the land where the fire starts or burns. However, if a fire investigator determines negligence is a factor in igniting a human-caused fire, the responsible party is responsible for paying the suppression costs.

***If a fire starts on privately owned rangeland***, then the responding agency (BLM, rangeland fire protection association, rural fire district, or sometimes the Forest Service) bears the cost of its own suppression action. In cases involving declared emergencies, the Federal Emergency Management Agency (FEMA) may cover a portion of the costs if communities or infrastructure are threatened. The State of Idaho does not have direct wildfire protection responsibility on rangelands.

**Currently by agreement, if a fire starts on rangeland owned by the State of Idaho,** does not spread to another ownership and is suppressed by the BLM, then the IDL will pay the suppression costs. If a fire starts on rangeland owned by the State of Idaho and spreads to another ownership, then IDL will pay a pro-rata share of the BLM's suppression costs. The IDL does not share in suppression costs when a fire starts on another ownership and spreads onto or across rangeland owned by the State of Idaho.

While IDL does incur fire suppression costs when the State of Idaho assists federal fire managers on fires they manage, the federal agencies reimburse IDL for use of State personnel and resources.

# Idaho Fire Protection

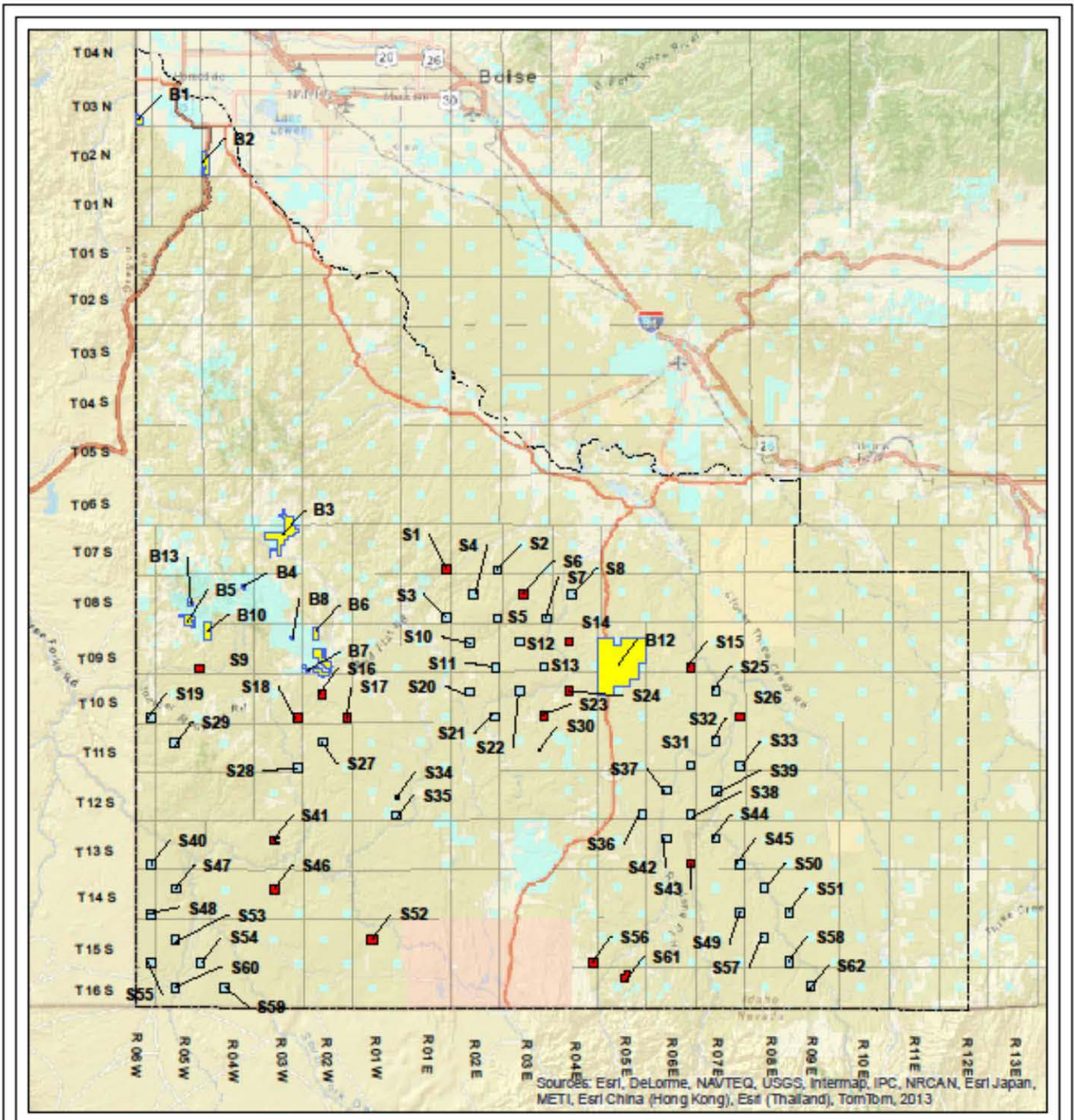


X:\Projects\mis\Map\_requests\Emily\FireProtectionLocations\_IndexMapApril2015.mxd EDY 2 April 2015



Appendix D  
Owyhee Land Exchange Map

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### Legend

- BLM Exchange Parcel
- IDL Exchange Parcel
- IDL Removed from Exchange
- Other State Lands
- Private
- Bureau of Land Management
- US Forest Service
- Other Federal Ownership/Control
- Tribal Lands
- Owyhee County Boundary

## Owyhee Land Exchange

### Parcel Index Map

2/18/2015

Scale 1:1,350,000

0 5 10 Miles

### Map Notes

Projection: Idaho Transverse Mercator, NAD 27  
Map Notes and Data Sources  
BLM Exchange Data as of Feb. 2014  
IDL Ownership Data current as of map date

Disclaimer:  
This map has been compiled using the best information available to the Idaho Department of Lands at the time and may be updated and/or revised without notice. In situations where known accuracy and completeness is required, the user has the responsibility to verify the accuracy of the map and the underlying data sources.

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Appendix E  
Monitoring Plan  
(To be completed)

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## Appendix F

### State Board of Land Commissioners Approval Memo

## STATE BOARD OF LAND COMMISSIONERS

April 21, 2015

Regular Agenda

### SUBJECT

IDL Proposed Greater Sage-Grouse Conservation Plan

### BACKGROUND

The Greater Sage-grouse (sage-grouse) is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan to be considered by the BLM in the EIS alternative analysis.

In October 2014, Director Tom Schultz established a working group which consisted of various IDL staff which oversee programs potentially impacted by the listing of the sage-grouse. This group held regular meetings to develop recommended conservation measures as part of IDL's Proposed Greater Sage-Grouse Conservation Plan based on the group's review of the science and what other western states are proposing, as well as designed to be complementary to Governor's Alternative for federal land management in Idaho.

For proposed activities by third parties on state endowment trust lands, IDL will implement sage-grouse conservation measures as enforceable stipulations in authorizing documents such as leases, permits, and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities, conservation measures will be voluntary best management practices (BMP's) on private land because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: Abandoned Mine Lands Projects; Dredge and Placer Mine Permits; Mine Reclamation Plan Approvals; and Oil and Gas Permits (seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended best management practices within its authorizing documents to encourage compliance.



Additionally, for some fire programs, IDL will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

## DISCUSSION

On February 17, 2015, Idaho Department of Lands (IDL) presented the Proposed Greater Sage-Grouse Conservation Plan to the Land Board as an information item. IDL sought initial feedback from the Land Board and indicated IDL would initiate an extensive stakeholder outreach effort and then come back to the Land Board for final approval of the plan at a future meeting.

Since that time IDL has completed the stakeholder outreach effort across all industries potentially impacted by the plan soliciting feedback on the Proposed Greater Sage-Grouse Conservation Plan using group and individual meetings. These meetings included direct discussions regarding language in the plan and the impacts of the proposed conservations measures on their industry practices.

IDL has revised the Proposed Greater Sage-Grouse Conservation Plan (Attachment 1) based on the feedback from stakeholder groups and on-going interactions with sister agencies. A summary of comments received by IDL is included as Attachment 2. A table of all comments received, with IDL responses, is included as Attachment 3. In addition, IDL's response to the U.S. Fish and Wildlife Service comment letter, written in conjunction with the Office of Species Conservation and Governor's Office, is included as Attachment 4. Finally, an informational sheet with key elements of the draft plan is Attachment 5.

## RECOMMENDATION

The Department recommends the Board approve the proposed Plan.

Upon approval, implementation of the Plan will be contingent on the federal agencies (USFWS and BLM) acceptance and incorporation of the Governor's Plan into the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS. Implementation will begin within 60 days of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS.

If the ROD does not include the foundational elements of the Governor's Plan, IDL will reevaluate, revise the Plan if necessary and inform the Board or seek approval as needed.

## BOARD ACTION

A motion was made by Controller Woolf that the Board adopt the Department recommendation, including the language of the second and third paragraphs in the Department's recommendation, and approve the proposed Plan. Attorney General Wasden seconded the motion. The motion carried on a vote of 5-0.

## ATTACHMENTS

1. Proposed Greater Sage-Grouse Conservation Plan
2. Proposed Greater Sage-Grouse Conservation Plan Comment Summary
3. Proposed Greater Sage-Grouse Conservation Plan Comment and Response Matrix
4. IDL Response to USFWS Comments on Draft Sage Grouse Plan
5. Key Elements of the Draft Plan



## Appendix G

### Idaho Oil and Gas Conservation Commission Approval Memo

## IDAHO OIL AND GAS CONSERVATION COMMISSION

April 23, 2015

Regular Agenda

### SUBJECT

IDL Proposed Greater Sage-Grouse Conservation Plan

### BACKGROUND

The Greater Sage-grouse (sage-grouse) is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment (LUPA) and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan to be considered by the BLM in the EIS alternative analysis. In October 2014, IDL Director Tom Schultz established a working group which consisted of various IDL staff which oversee programs potentially impacted by the listing of the sage-grouse. This group held regular meetings to develop recommended conservation measures as part of IDL's Proposed Greater Sage-Grouse Conservation Plan based on the group's review of the science and what other western states are proposing, as well as designed to be complementary to Governor's Alternative for federal land management in Idaho.

As a result, IDL will implement sage-grouse conservation measures as enforceable lease stipulations for proposed oil and gas development activities occurring on state endowment lands. Regarding oil and gas regulatory activities under the purview of the Commission, IDL has developed voluntary conservation measures. These conservation measures will be presented as recommended best management practices (BMP's) to companies applying for drilling permits. These companies will then select which BMP's they can comply with to be incorporated as permit conditions. These BMP's will then become required and verified through the inspection process.

### DISCUSSION

On February 12, 2015 the Idaho Department of Lands (IDL) presented the Proposed Greater Sage-Grouse Conservation Plan to the Commission as an informational item. IDL sought initial feedback from the Commission and indicated IDL would initiate an extensive stakeholder outreach effort and then come back to the Commission for final approval of the plan at a future meeting.

Since that time IDL has completed the stakeholder outreach effort by soliciting feedback on the Proposed Greater Sage-Grouse Conservation Plan using group and individual meetings. These meetings

included direct discussions regarding language in the plan and the impacts of the proposed conservation measures on practices of the oil and gas industry.

IDL has revised the Proposed Greater Sage-Grouse Conservation Plan (Attachment 1) based on the feedback from stakeholder groups and on-going interactions with sister agencies. Excerpts from the plan for the Commission's consideration are included as Attachment 2. A summary of the comments received by IDL pertaining to oil and gas is included as Attachment 3. A copy of all comments received related to Oil and Gas, with IDL responses, is included as Attachment 4. Finally, IDL's response to the U.S. Fish and Wildlife Service comment letter, written in conjunction with the Office of Species Conservation and Governor's Office, is included as Attachment 5.

Implementation of the Proposed Greater Sage-Grouse Conservation Plan will occur through voluntary agreements between industry and IDL. Updated Standard Operating Procedures will call for IDL to provide applicants requesting permits to drill within core and important habitat with Conservation Measures (CM's). Applicants will then acknowledge which, if any, CM's can be complied with and incorporated as enforceable permit conditions. Monitoring of CM's stipulated to will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include sections for documenting implementation of CM's as well as an assessment of effectiveness.

#### RECOMMENDATION

The Department recommends the Commission approve the applicable sections of Part II of the proposed Plan.

Upon approval, implementation of the Plan will be contingent on the federal agencies (USFWS and BLM) acceptance and incorporation of the Governor's Plan into the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS. Implementation will begin within 60 days of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS.

If the ROD does not include the foundational elements of the Governor's Plan, IDL will reevaluate and revise the Plan if necessary and inform the Commission or seek approval as needed.

#### COMMISSION ACTION

A motion was made by Commissioner Classen that the Commission approve the recommendation. Vice Chairman Chipman seconded the motion. The motion carried on a vote of 5-0.

#### ATTACHMENTS

6. Proposed Greater Sage-Grouse Conservation Plan
7. Excerpts for Oil and Gas Conservation Commission Consideration
8. Oil and Gas Related Comment Summary
9. Oil and Gas Related Comment and Response Matrix
10. IDL Response to USFWS Comments on Draft Sage Grouse Plan



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Fremont County Commissioners  
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Craters of the Moon National Monument  
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**Commented [GJD1]:** Cooperating Agencies receive a copy of the Executive Summary, Plus Volumes II A&B.

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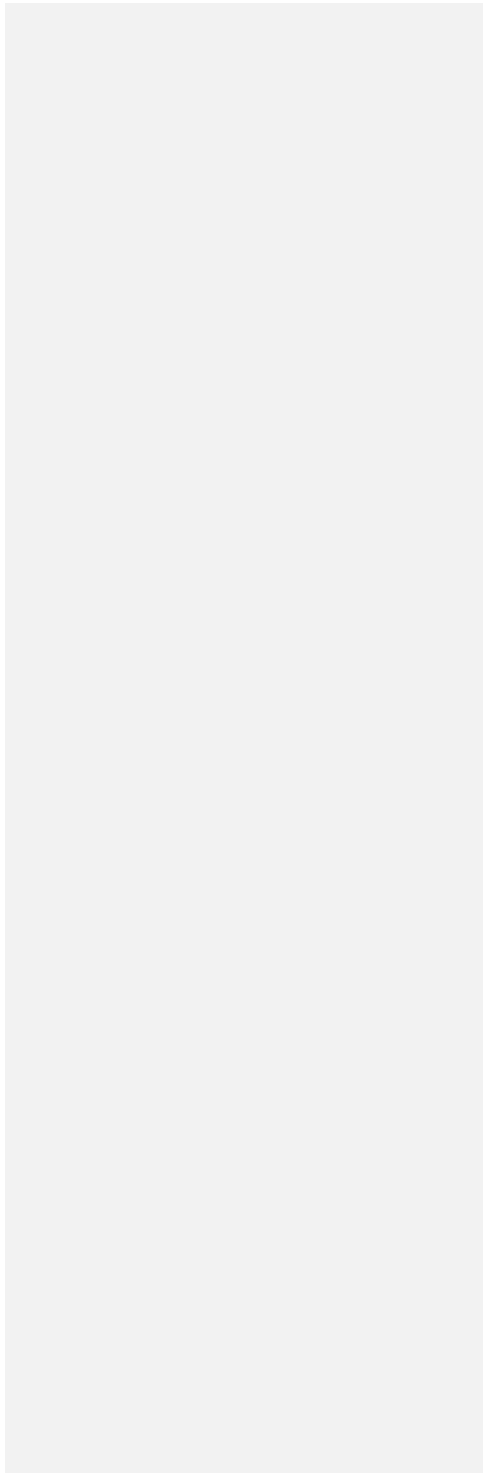
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Cecilia Seesholtz, Forest Supervisor  
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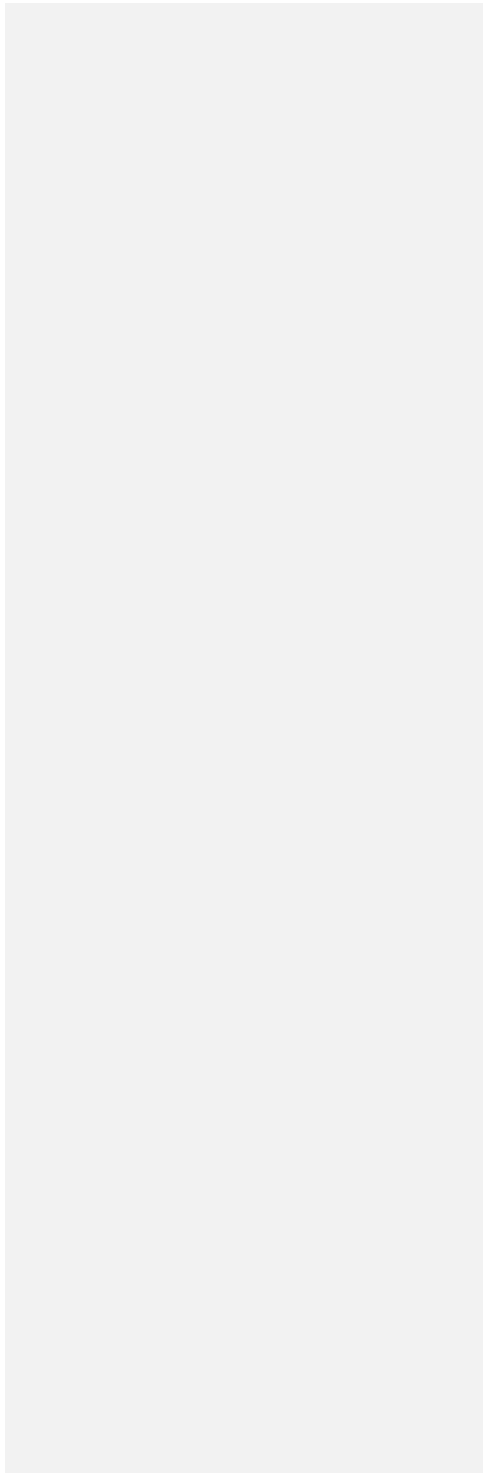
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Chuck Mark, Forest Supervisor  
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**BLM Field Offices/the people on this list receive all five volumes of the DEIS.**

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BLM Owyhee Field Office  
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Marsing, ID 83639

BLM Idaho Falls District  
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BLM Twin Falls District  
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Twin Falls, ID 83301

BLM Burley Field Office  
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Burley, ID 83318

BLM Challis Field Office  
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BLM Pocatello Field Office  
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BLM Salmon Field Office  
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BLM Salmon Field Office  
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Idaho and Southwest Montana Administrative Draft Proposed Plan Response to FWS Comments on Draft Preferred Alternatives

Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<b>PACs: Snake-Salmon-Beaverhead (SSB), 23; Northern Great Basin (NGB), 26a.</b>	Retain sage-grouse habitats within PACs <i>(pertains to PAC designation; actions below this line are evaluated independent of PAC designation for each Alternative)</i>	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Priority, Medial, and General habitats identified.	Core, Important, and General habitats identified.	Core, Important and General Management Zones designated.
	If PACs are lost to catastrophic events, implement appropriate restoration efforts.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.
	Restore and rehabilitate degraded sage-grouse habitat within PACS.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.	Passive and acitve conservation measures identified for restoration and prioritization of restoration activities. Adaptive management (AM) will ensure appropriate priortization.

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**Idaho and Southwest Montana Administrative Draft Proposed Plan Response to FWS Comments on Draft Preferred Alternatives**

Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
	Identify areas and habitats outside of PACs which may be necessary to maintain viability of sage-grouse. If development or vegetation manipulation activities outside of PACs are proposed, the project proponent should work with federal, state or local agencies and interested stakeholders to ensure consistency with sage-grouse habitat needs.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Priority, Medial, and General areas include habitats outside of PACs, but lacks specific discussion of habitats that may or may not be necessary outside of PACs.	Core and Important Habitat Zones directly overlay with the PACs. General habitats outside of PACs. Lacks specific discussion of habitats that may or may not be necessary outside of PACs.	<b>Core, Important and General Management Zones are designated which include PAC areas as well as areas outside the PAC with associated management direction to maintain and enhance GRSG habitat. (MA-2, MA-4, MA-6 and Map 2)</b>
	Re-evaluate the status of PACs and adjacent sage-grouse habitat at least once every 5-years, or when important new information becomes available.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Adaptive Management strategy identifies a population and habitat re-evaluation process.	Adaptive Management strategy identifies a population and habitat re-evaluation process.	<b>Adaptive Management strategy identifies a population and habitat re-evaluation process.</b>
	Actively pursue opportunities to increase occupancy and connectivity between PACs.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Priority and Medial areas include habitats outside of PACs, but lacks specific discussion of habitats necessary for increased occupancy or connectivity.	Core and Important Habitat Zones directly overlay with the PACs. No habitats outside of PACs identified. Lacks specific discussion of habitats necessary for increased occupancy or connectivity.	<b>Core, Important and General Management Zones are designated which include PAC areas as well as areas outside the PAC with associated management direction to maintain and enhance GRSG habitat. (MA-2, MA-4, MA-6 and Map 2)</b>



**Idaho and Southwest Montana Administrative Draft Proposed Plan Response to FWS Comments on Draft Preferred Alternatives**

Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
	Maintain or improve existing habitat conditions in areas adjacent to burned habitat.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Lacks conservation measures to adequately address this objective. Lacks specific measures for habitats adjacent to burned areas or integration with AM process.	Lacks conservation measures to adequately address this objective. Lacks specific measures for habitats adjacent to burned areas or integration with AM process.	Conservation measures are included to assess and adjust activities post fire in both fire, rehabilitation and adjacent areas to both ensure successful post-fire recovery and to mitigate the effect of the burn on GRSG populations. (ESR-3 & ESR-4)
Fire - SSB = Y; NGB = Y	Retain and restore healthy native SB communities within GSG range	Restrict or contain fire within the normal range of fire activity (assuming a healthy native perennial sagebrush community), including size and frequency, as defined by the best available science.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM. Increased specificity and integration of conservation measures for prevention, suppression, and restoration.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM. Increased specificity and integration of conservation measures for prevention, suppression, and restoration. Fire Actions table (D-156) provides some good examples.	Conservation measures identified that provide certainty of implementation and effectiveness needed to meet this measure. (WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 & FM-6) Includes adequate monitoring and AM. Increased specificity and integration of conservation measures for prevention, suppression, and restoration.
		Eliminate intentional fires in sagebrush habitats, including prescribed burning of breeding and winter habitats.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Lacks conservation measures to adequately address this measure. Should include conservation measures that directly address appropriate use of prescribed burning. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
		Design and implement restoration of burned sagebrush habitats to allow for natural succession to healthy native sagebrush plant communities.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.
		Implement monitoring programs for restoration activities. To ensure success, monitoring must continue until restoration is complete, with sufficient commitments to make adequate corrections to management efforts if needed.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.
		Immediately suppress fire in all sagebrush habitats.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<p><b>Non-native, Invasive Plant Species - Weeds/Annual Grasses SSB = Y; NGB = Y</b></p>	<p>Maintain and restore healthy, native SB communities</p>	<p>Retain all remaining large intact sagebrush patches, particularly at low elevations.</p>	<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Increased specificity and integration of conservation measures for prevention, suppression, and restoration. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Increased specificity and integration of conservation measures for prevention, suppression, and restoration. Fire Actions table (D-156) provides some good examples. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that provide certainty of implementation and effectiveness needed to meet this measure. (AD-1, AD-2, MIT-3, WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 &amp; FM-6) Includes adequate monitoring and AM. Increased specificity and integration of conservation measures for prevention, suppression, and restoration.</p>
		<p>Reduce or eliminate disturbances that promote the spread of these invasive species.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>
		<p>Monitor and control invasive vegetation post-wildfire for at least three years.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>
		<p>Require best management practices for construction projects in and adjacent to sagebrush habitats to prevent invasion.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
		Restore altered ecosystems such that non-native invasive plants are reduced to levels that do not put the area at risk of conversion if a catastrophic event were to occur.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM.	Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. (Table 1 - Treatment Objectives, WFS-1, INV-1) Includes adequate monitoring and AM.
Energy Development SSB = Y; NGB = L	Energy development should be designed to insure that it will not impinge upon stable or increasing GSG population trends	Avoid energy development in PACs.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. "No net habitat loss" versus 3% disturbance cap. Further clarity of "no net habitat loss". Application across all PACs.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Application of 3% across all PACs and inclusion of other infrastructure (as discussed in letter).	Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. "No net unmitigated habitat loss" and 3% disturbance cap have both been included and further described. (AD-1, AD-2, MIT-4 and Appendix K)

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
		<p>If avoidance is not possible in PACs due to pre-existing valid rights, adjacent development, or split estate issues, development should only occur in non-habitat areas, including all appurtenant structures, with an adequate buffer that is sufficient to preclude impacts to sage-grouse habitat from noise, and other human activities.</p>	<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM. See specific comments above.</p>	<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Includes adequate monitoring and AM. See specific comments above.</p>	<p><b>Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. (AD-3, AD-4, AD-5 and Appendix C - Buffers) Includes adequate monitoring and AM.</b></p>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
		<p>If development must occur in sage-grouse habitats due to existing rights and lack of reasonable alternative avoidance measures, the development should occur in the least suitable habitat for sage-grouse and be designed to ensure at a minimum that there are no detectable declines in sage-grouse population trends (see row below and COT report for measures to implement to facilitate this).</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>
<p><b>Sagebrush Removal / Elimination</b> SSB = L; NGB = L</p>	<p>Avoid SB removal or manipulation in GSG breeding or wintering habitats.</p>	<p>No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Lacks conservation measures to adequately address this measure. Should include conservation measures that directly address appropriate removal or manipulation of sagebrush in GRSG habitats. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<p><b>Grazing SSB = Y; NGB = Y</b></p>	<p>Conduct grazing management for all ungulates in a manner consistent with local ecological conditions that maintains or restores healthy SB shrub and native perennial grass and forb communities and conserves the essential habitat components for GSG (shrub and nesting cover). Areas which do not currently meet this standard should be managed to restore these components. Adequate monitoring of grazing strategies and their results, with necessary changes in strategies, is essential to ensuring that desired ecological conditions and GSG response are achieved. Livestock and wild ungulate numbers must be managed at levels that allow native</p>	<p>No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</p>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
Range Management Structures (no ratings)	Avoid or reduce the impact of RMS on GSG.	Range management structures should be designed and placed to be neutral or beneficial to sage-grouse.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.
		Structures that are currently contributing to negative impacts to either sage-grouse or their habitats should be removed or modified to remove the threat.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.
FR Equid Management SSB = Y; NGB = L	Protect sage-grouse from the negative influences of grazing by free roaming equids.	Develop, implement, and enforce adequate regulatory mechanisms to protect sage-grouse habitat from negative influences of grazing by free-roaming equids.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	This alternative meets the objective for this issue, but lacks specificity to adequately meet this measure. Should include conservation measures that specifically address FR equids and GRS habitat.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.
		Manage free-roaming equids at levels that allow native sagebrush vegetative communities to minimally achieve PFC (for riparian areas) or RHS (for uplands).	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.



**Idaho and Southwest Montana Administrative Draft Proposed Plan Response to FWS Comments on Draft Preferred Alternatives**

Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<b>Pinyon-juniper Expansion / Conifers SSB = L; NGB = Y</b>	Remove pinyon-juniper from areas of SB that are most likely to support GSG (post-removal) at a rate at least equal to the rate of p-j incursion	No conservation measures specified. Is conservation objective addressed applying locally-derived measures?	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Conservatrion measures should include a commitment to a "rate" or a "no net gain" of p-j. Includes adequate monitoring and AM.	Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this measure. Conservatrion measures should include a commitment to a "rate" or a "no net gain" of p-j. Includes adequate monitoring and AM.	<b>Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. Conservation measures include a treatment objective supporting a "no net gain" of conifer. (Table 1 - Treatment Objectives) Includes adequate monitoring and AM.</b>
<b>Agricultural Conversion SSB = L; NGB = L</b>	Avoid further loss of sagebrush habitat for agricultural activities (both animal and plant production) and prioritize restoration. In areas where taking agricultural lands out of production has benefited GSG, the programs supporting these actions should be targeted and continued (e.g., CRP/SAFE). Threat amelioration activities should, at a minimum, be prioritized within PACS, but should be considered in all GSG habitats.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Lacks conservation measures to adequately address this measure. Should include conservation measures that directly address loss of sagebrush/GRSG habitats to Ag Conversion. Includes adequate monitoring and AM.	<b>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</b>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<b>Mining SSB = L; NGB = L</b>	Maintain stable to increasing GSG populations and no net loss of GSG habitats in areas affected by mining	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Recognizing that this threat has limited and localized impacts, this alternative meets the objective for this issue pending increased specificity on the mitigation strategy.	Recognizing that this threat has limited and localized impacts, this alternative meets the objective for this issue pending increased specificity on the mitigation strategy.	<b>Recognizing that this threat has limited and localized impacts, this alternative meets the objective for this issue pending increased specificity on the mitigation strategy.</b>
<b>Recreation SSB = L; NGB = Y</b>	In areas subjected to recreational activities, maintain healthy native SB communities based on local ecological conditions and with consideration of drought conditions, and manage direct and indirect human disturbance (including noise) to avoid interruption of normal GSG behavior.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	<b>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</b>
<b>Ex-Urban Development / Urbanization SSB = N; NGB = Y</b>	Limit urban and exurban development in GSG habitats and maintain intact native SB communities.	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.	Lacks conservation measures to adequately address this measure. Should include conservation measures that directly address loss of sagebrush/GRSG habitats to ex-urban development. Includes adequate monitoring and AM.	<b>Conservation measures identified that adequately address this measure. Includes adequate monitoring and AM.</b>

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Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<p><b>Infrastructure</b>  <b>SSB = L; NGB = Y</b></p>	<p>Avoid development of infrastructure within PACs.</p>	<p>No new development of infrastructure within PACs. Designated, but not yet developed infrastructure corridors should be re-located outside of PACs unless it can be demonstrated that these corridors will have no impacts on the maintenance of neutral or positive sage-grouse population trends or habitats. New infrastructure should be avoided where individual state plans have identified key connectivity corridors outside of PACs.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this objective. Increased clarity regarding the exemption process and associated mitigation. Includes adequate monitoring and AM.</p>	<p>Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.</p>
		<p>Where state sage-grouse management plans provide an effective strategy for infrastructure those strategies should be implemented. In all other situations the conservation options in the COT report should be considered.</p>		<p>Conservation measures identified, but lack certainty of implementation and effectiveness needed to meet this objective. Increased clarity regarding the exemption process and associated mitigation. Includes adequate monitoring and AM.</p>	<p><b>The State of Idaho is supportive of the Proposed Plan and is working towards additional State regulatory mechanisms that would manage state, and to a certain extent, private lands, consistent with this plan. Conservation measures are identified clarifying the</b></p>

**Idaho and Southwest Montana Administrative Draft Proposed Plan Response to FWS Comments on Draft Preferred Alternatives**

Issue <sup>1</sup>	Conservation Objective from COT Report	Conservation Measures / Options from COT Report	Alternative D (Subregion)	Alternative E (State)	Alternative G (Proposed Plan)
<b>Fences (no ratings)</b>	Minimize the impact of fences on GSG populations	No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective?	Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.	Conservation measures identified that adequately address this objective. Includes adequate monitoring and AM.

<sup>1</sup>Threat Ratings from COT Report      <sup>2</sup>Subjective Consistency (with COT Report) Rating Continuum

Y: Pres. and Widespread	High Concern &/or Very Low Consistency
L: Pres. and Localized	↑
N: Not Known to be Pres.	Lower Concern &/or Higher Consistency
NA	NA

**Idaho and Southwestern Montana Greater Sage-Grouse Plan Amendment  
Response and Consistency with COT Recommendation Comments on Draft EIS Preferred Alternatives**

<b>Topic</b>	<b>FWS Comments on DEIS</b>	<b>BLM Proposed Plan Resolution</b>
<b>Adaptive Management</b>	1. We recommend that the FEIS include both a hard and a soft [adaptive management] trigger... We believe that inclusion of a soft trigger (10%) in the FEIS would provide increased responsiveness to stochastic threats and additional flexibility for proactive management; both important elements that increase stakeholder participation and early implementation of incentive-based conservation actions.	The PP includes both hard and soft adaptive management triggers. (AM-7, AM-8, AM-9 & AM-10)
<b>Adaptive Management</b>	2. We recommend that an Implementation Team/Commission process be included in the FEIS. The process should also include specificity regarding team composition and how science will inform the process and ultimate decision regarding remediation actions.	The PP includes direction to coordinate with the State of Idaho and Montana on both adaptive management and mitigation to support implementation and consideration of both adaptive management responses and mitigation requirements. (CC-2, CC-4, AM-11, AM-12, MIT-1 & MIT-2)
<b>Adaptive Management</b>	3. An explanation should be provided for why the identified baseline year was selected for the adaptive management triggers.	The PP includes an appendix that describes the delineation and rationale supporting the data sets used to develop the baseline maps. (Appendix I & Appendix H)
<b>Conifer Encroachment</b>	4. We recommend the selected alternative identify a rate at which treatments should be implemented to meet the COT objective. Additionally, removal of pinyon-juniper trees encroaching within 1000 meters of a lek should be the highest priority.	The PP includes conservation measures with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. Conservation measures include a treatment objective supporting a "no net gain" of conifer. (Table 1 - Treatment Objectives)
<b>Disturbance</b>	5. The DEIS does not provide adequate specificity regarding how the "no net habitat loss" standard would be implemented to determine its consistency with the COT report or whether it would be a suitable replacement for a disturbance cap. Please provide further clarification of how this approach would be consistent with the COT report.	The PP includes both a disturbance cap (3%) and a requirement for no net unmitigated loss resulting from development activities. (AD-1, MIT-3, MIT-4 & Appendix K)
<b>Disturbance</b>	6. Alternative E prescribes a 3 percent anthropogenic disturbance cap in the Core Habitat Zone (CHZ) and a	The PP includes a disturbance cap (3%) that applies to

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Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
	<p>5 percent anthropogenic disturbance cap in the Important Habitat Zone (IHZ). Both of these caps would only apply to fluid mineral development (pg. 2-100). We recommend that a 3 percent disturbance cap be applied to the CHZ and the IHZ and that the cap include other anthropogenic disturbances (for example, Infrastructure as defined by Alternative E, pg. D-33).</p>	<p>large scale anthropogenic disturbance. (AD-1 &amp; Appendix H)</p>
<b>Disturbance</b>	<p>7. The available scientific literature discusses several different spatial scales and evaluates different land use activities than those assessed in the DEIS. Therefore, we recommend that you provide a clear analysis and rationale in the DEIS of the methods you will use to calculate disturbance to sage-grouse habitat.</p>	<p>The PP defines an appropriate analysis scale which is consistent with the broad scale monitoring framework and supports a step-down or roll-up consistent with that direction to appropriately apply to the local scale and consistently relate to the broader scale. (AD-1 &amp; Map 3)</p>
<b>Disturbance</b>	<p>8. The DEIS does not provide adequate specificity regarding how the "no net habitat loss" standard would be implemented to determine its consistency with the COT objective. If it is the intent of Alternative D to implement a 3 percent disturbance cap as well as the above mentioned NSOs and noise stipulations, it would be consistent with the COT objective. Although Alternative E is largely consistent with the COT, we would recommend that the 3 percent disturbance cap be consistently applied across the P ACs (CHZ and the IHZ) and that it include other anthropogenic disturbances (as discussed above).</p>	<p>The PP includes conservation measures with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. "No net unmitigated habitat loss" and 3% disturbance cap have both been included and further described. (AD-1, AD-2, MIT-4 and Appendix K)</p>
<b>Effects Analysis</b>	<p>9. We recommend that the impact analysis be improved through the following ways:                      a. We need more clarity as to the extent to which proposed actions within each alternative would ameliorate the threats to GRSG within the identified analysis areas. This is not to suggest that the current conservation measures within the range of alternatives are inadequate, but rather to emphasize the need for a more comprehensive impact analysis. Currently, the analysis demonstrates the extent to which an impact is</p>	<p>While the effects analysis is not complete and is undergoing revision and development, USFWS staff is involved in this process and are helping to identify and work with the effects analysis teams to ensure these components are sufficiently addressed in the Final EIS.</p>

Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
	<p>reduced within a Population Area. However, it should also incorporate the best available science to show how that reduction could ameliorate the associated threat and consequently impact GRSG individuals and populations. The impacts to individuals and associated populations should then be compared across alternatives.</p> <p>b. The analysis should consider the beneficial impacts of best management practices and required specific design features where appropriate.</p> <p>c. The analysis should address the extent to which conservation measures within the alternatives meet the objectives of the COT. For example, we recommend inclusion of the COT matrix with an associated narrative.</p>	
<b>Fire and Invasives</b>	<p>10. We also recommend incorporating literature by the Fire and Invasive Species Team (FIST), which is currently developing landscape prioritization for fire and invasive species, as well as step down assessments.</p>	<p>The PP includes conservation measures that address the step down assessments and wildfire prevention, suppression and post-fire restoration and the commitment to implement findings from these assessments. (WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 &amp; FM-6)</p>
<b>General</b>	<p>11. We encourage the BLM and FS to resolve any inconsistencies across planning boundaries where these differences do not have a clear basis. Where differences in management are warranted, the rationale for divergent management approaches should be fully explained as they pertain to meeting the COT objectives.</p>	<p>The Proposed Plan (PP) conforms to the NPT guidance on land allocation decisions that are consistent with adjacent planning areas. There are several minor divergences that are more protective of GRSG and their habitat than described in the NPT guidance (fluid minerals, ROWs). (MA-2)<sup>1</sup></p>
<b>General</b>	<p>12. We hope that through our comments, the BLM and FS will expand the detail of several key components to a level where we can fully evaluate the FEIS pursuant to the COT. Some key components include:</p> <p>a. Details on how habitat and disturbance will be monitored;</p> <p>b. Methods of landscape-scale prioritization and implementation of step-down assessments for addressing</p>	<p>The PP includes a description of the monitoring efforts that will be completed to support implementation and evaluation of the PP. (MON-1, MON-2, MON-3, MON-4, MON-5, MON-6, MON-7, Appendix E &amp; Appendix F)</p> <p>The PP includes conservation measures that address the</p>

<sup>1</sup> All references are based on the June 27, 2014 version of the BLM administrative draft proposed plan.

Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
	<p>threats from fire and invasive species; and                      c. Details on how mitigation will be applied.</p>	<p>step down assessments and wildfire prevention, suppression and post-fire restoration. (WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 &amp; FM-6)                      The PP includes a more detailed description of the mitigation program and also identifies specific implementation actions to develop a detailed mitigation plan in coordination with the states utilizing their frameworks as a foundation. The state framework identifies metrics and conservation measures to be considered as well as identification of service area considerations. (MIT-1, MIT-2 &amp; Appendix J)</p>
<p><b>General – COT Evaluation Table</b></p>	<p>13. There are several management actions within both Alternatives D and E that lack the specificity needed to ensure conservation measures are consistent with the COT.</p> <ul style="list-style-type: none"> <li>a. lacks specific discussion of habitats that may or may not be necessary outside of PACs.</li> <li>b. lacks specific measures for habitats adjacent to burned areas or integration with AM process.</li> <li>c. lacks specificity and integration of conservation measures for fire prevention, suppression, and restoration.</li> <li>d. lacks specificity regarding "No net habitat loss" versus 3% disturbance cap. Further clarity of "no net habitat loss". Application across all PACs; lacks application of 3% across all PACs and inclusion of other infrastructure (as discussed in letter).</li> <li>e. lacks inclusion of a "rate" or a "no net gain" of p-j.</li> <li>f. lacks clarity regarding the exemption process and associated mitigation.</li> </ul>	<ul style="list-style-type: none"> <li>a. Core, Important and General Management Zones are designated which include PAC areas as well as areas outside the PAC with associated management direction to maintain and enhance GRSG habitat. (MA-2, MA-4, MA-6 and Map 2)</li> <li>b. Conservation measures are included to assess and adjust activities post fire in fire, rehabilitation and adjacent areas to both ensure successful post-fire recovery and to mitigate the effect of the burn on GRSG populations. (ESR-3 &amp; ESR-4)</li> <li>c. Conservation measures identified that provide certainty of implementation and effectiveness needed to meet this measure. (WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 &amp; FM-6) Includes adequate monitoring and AM. Increased specificity and integration of conservation measures for prevention, suppression, and restoration.</li> <li>d. Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. "No net unmitigated habitat loss" and 3%</li> </ul>



Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
		<p>disturbance cap have both been included and further described. (AD-1, AD-2, MIT-4 and Appendix K)</p> <p>e. Conservation measures identified with sufficient specificity to ensure certainty of implementation and effectiveness needed to meet this measure. Conservation measures include a treatment objective supporting a "no net gain" of conifer. (Table 1 - Treatment Objectives)</p> <p>f. Conservation measures are identified clarifying the exemption process and associated mitigation. (AD-3 &amp; AD-4)</p>
<b>Invasives</b>	<p>14. We need additional clarity for both Alternative D and E as to site-specific actions to meet the COT objective. Both preferred alternatives have appropriately identified the need to work more extensively at a local scale to coordinate and implement actions that will result in improved wildfire and invasive species management strategies. As discussed above for fire, inclusion of commitments to implement conservation projects identified in the step-down assessments will be needed to increase our certainty that actions, necessary for GRSG conservation, will occur.</p>	<p>The PP includes conservation measures that address the step down assessments and invasive species and the commitment to implement findings from these assessments. (WFS-1, ESR-1 &amp; INV-1)</p>
<b>Management Areas</b>	<p>15. We recommend that the habitat categories included in the FEIS be biologically meaningful and pragmatically effective.</p>	<p>BLM and FS have worked in coordination with FWS and the State of Idaho to adjust management zones to more accurately delineate biologically relevant and meaningful areas that are appropriate in coordination with the adaptive management strategy and disturbance threshold. (MA-2)</p>
<b>Mining</b>	<p>16. The COT objective is to maintain stable to increasing GRSG populations and no net loss of GRSG habitats in areas affected by mining. Both Alternative D and Alternative E propose to implement conservation</p>	<p>The PP includes a more detailed description of the mitigation program and also identifies specific implementation actions to develop a detailed mitigation plan in coordination with the states utilizing their</p>

Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
	<p>measures that meet the COT objective; however, we will need further specificity on mitigation requirements (see general comment on mitigation).</p>	<p>frameworks as a foundation. The state framework identifies metrics and conservation measures to be considered as well as identification of service area considerations. (MIT-1, MIT-2 &amp; Appendix J)</p>
<b>Mitigation</b>	<p>17. To meet several conservation objectives within the COT, a "meaningful mitigation" program must be implemented. Both Alternatives D and E contain some essential elements for a comprehensive mitigation strategy, but we need additional details. We also encourage the inclusion of the concept of "additionality" and a "net conservation benefit" standard. We encourage close coordination with the State on this mitigation element in order to maintain their important collaborative conservation process.</p>	<p>The PP includes a more detailed description of the mitigation program and also identifies specific implementation actions to develop a detailed mitigation plan in coordination with the states utilizing their frameworks as a foundation. (MIT-1, MIT-2 &amp; Appendix J)</p>
<b>Mitigation</b>	<p>18. We need additional detail for both Alternatives D and E regarding how mitigation will be accomplished in future decision making processes. Further clarity is needed in the following areas:</p> <ul style="list-style-type: none"> <li>a. Methodologies or metrics that will be used to determine expected impacts of actions and conservation measures used to offset them.</li> <li>b. Identification of "service areas," or areas where offsets would be focused.</li> <li>c. Inclusion of a transparent and accountable monitoring program that includes performance standards that are used to ensure conservation measures meet predetermined goals and objectives.</li> <li>d. The role of the land management agency(s) if the Alternative E mitigation program were implemented.</li> </ul>	<p>The PP includes a more detailed description of the mitigation program and also identifies specific implementation actions to develop a detailed mitigation plan in coordination with the states utilizing their frameworks as a foundation. The state framework identifies metrics and conservation measures to be considered as well as identification of service area considerations. (MIT-1, MIT-2 &amp; Appendix J)</p>
<b>Monitoring</b>	<p>19. Both Alternatives D and E currently lack a clear explanation of how implementation monitoring would be executed (including intervals and standards). Such an explanation is needed for us to fully evaluate the efficacy of the monitoring being proposed.</p>	<p>The PP includes a description of the monitoring efforts that will be completed to support implementation and evaluation of the PP. (MON-1, MON-2, MON-3, MON-4, MON-5, MON-6, MON-7, Appendix E &amp; Appendix F)</p>

Topic	FWS Comments on DEIS	BLM Proposed Plan Resolution
<b>Monitoring</b>	20. With regard to habitat monitoring, it is currently unclear how habitat change will be monitored within either Alternative D or Alternative E. For example, habitat monitoring discussed in Alternative D (Chapter 2) is significantly different than the Monitoring Framework Plan discussed in Appendix E. While we support the habitat characteristics identified in Alternative E, a more robust description of the habitat monitoring program should be provided.	The PP includes a more detailed description of habitat monitoring efforts. (MON-3, MON-4, MON-5, MON-6, MON-7, Appendix E & Appendix F)
<b>Noise</b>	21. Noise and seasonal stipulations should be considerations during the construction and long-term implementation of land use activities. Your proposed implementation of noise and seasonal stipulations across all alternatives appears to be applied only to initial construction activities.	The PP includes required design features which apply to noise levels associated with leks, these RDFs would be applied to project proposals and developments where and when these concerns exist as either stipulations or conditions of approval. They would apply to both construction and operation (when taken in combination with seasonal restrictions also included as RDFs). (GD-16, GD-17, GD-18, GD-19, Appendix A & Appendix B)
<b>Prescribed Fire</b>	22. We recommend that the FEIS include provisions to eliminate prescribed burning in sage-grouse wintering and breeding [i.e., lekking, nesting and early brood rearing (Connelly et al. 2004, Connelly et al. 2011)] habitats unless biologically justified; If prescribed fire is allowed in GRSG habitats, then we recommend that the FEIS commit to using the risk analysis tool currently in development by WAFWA.	The PP includes conservation measures to address treatments, including prescribed fire. (FM-3)
<b>Wildfire</b>	23. We need additional clarity for...wildfire and invasive species management strategies. The step-down assessments, as identified in Alternative D (Appendix K), provide a sound framework upon which to complete these actions. Inclusion of commitments to implement conservation projects identified in these step-down assessments will be needed to increase our certainty that actions, necessary for GRSG conservation, will occur.	The PP includes conservation measures that address the step down assessments and wildfire prevention, suppression and post-fire restoration and the commitment to implement findings from these assessments. (WFS-1, WFS-2, WFS-3, WFS-4, WFS-7, FM-4, FM-5 & FM-6)





Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Re: 3.1 mile lek buffer layer**

1 message

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**Beck, Jonathan** <jmbeck@blm.gov>  
To: Joshua Uriarte <Joshua.Uriarte@osc.idaho.gov>  
Cc: Jonathan Beck <jmbeck@blm.gov>

Mon, Jun 15, 2015 at 7:41 AM

Josh, we don't have 3.1 miles as a layer because it is not an allocation decision and would be applied on a case-by-case basis as we determine the effects of projects during project implementation. Jon

On Fri, Jun 12, 2015 at 9:13 AM, Joshua Uriarte <Joshua.Uriarte@osc.idaho.gov> wrote:

Jon,

Do you have a layer for the 3.1 mile lek buffer for the GRSG FEIS? If so, could you send me the shapefiles. I've been getting some folks that would like to look at these layers and see how they would be affected.

Let me know,

Thank you,

**Joshua Uriarte**

**Program Manager & Policy Advisor**

**Governor's Office of Species Conservation**

**304 North 8<sup>th</sup> Street, Suite 149**

**Boise, Idaho 83702**

**P:208-332-1556/F:208-334-2172**

**[Species.Idaho.gov](http://Species.Idaho.gov)**

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Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

**Meredith Zaccherio**

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**From:** Beck, Jonathan <jmbeck@blm.gov>  
**Sent:** Tuesday, February 24, 2015 7:43 AM  
**To:** Lauren Mermejo  
**Cc:** Meredith Zaccherio  
**Subject:** Re: FW: SHPO correspondence for GRSG plans

Lauren, we did not send the draft to SHPO seeking comment. Therefore, we did not receive any comments. We only send the 106 documents for their review and concurrence. Idaho SHPO does not care to see nepa docs. Jon

On Mon, Feb 23, 2015 at 10:39 AM, Lauren Mermejo <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)> wrote:

Hi Folks –

Sarah Shattuck is looking for copies of the following from each of you:

- 1) BLM's letter/request to the SHPOs seeking input on the DEISs; and
- 2) Comments/response letters from the SHPOs on the DEISs.

Please send the letter and any comments that you received to me by the end of the week. I will follow-up with Sarah.

Thank-you!

Lauren

--  
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

**DIRECTOR'S OFFICE**  
300 N 6th Street Suite 103  
PO Box 83720  
Boise ID 83720-0050  
Phone (208) 334-0200  
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**STATE BOARD OF LAND COMMISSIONERS**  
C. L. "Butch" Otter, Governor  
Lawrence E. Denney, Secretary of State  
Lawrence G. Wasden, Attorney General  
Brandon D. Woolf, State Controller  
Sherri Ybarra, Sup't of Public Instruction

April 3, 2015

Michael Carrier  
State Supervisor, Idaho Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
1387 S. Vinnell Way, Room 368  
Boise ID 83706

Dear Mr. Carrier,

The Idaho Department of Lands (IDL) has received and appreciates your timely response to the IDL Draft Proposed Greater Sage-Grouse Conservation Plan (Plan).

Part I of the Plan specifically addresses conservation measures to be enforced on state endowment trust lands (endowment lands) in sage-grouse habitat. The trust land management concept differs from the management model of federally owned lands. The management of endowment lands must adhere to a trust mandate embedded in the Idaho Constitution (Article IX, Section 8) – to maximize long-term financial returns to public schools and other beneficiaries – with the State Board of Land Commissioners (Land Board) assigned the duty of overseeing operations of endowment lands and the funds they generate. A small percentage of the lands located within Core and Important sage-grouse habitat zones in Idaho are endowment lands.

The Plan complements Governor C.L. "Butch" Otter's Sage-grouse Conservation Plan (Governor's Plan) for federal lands in Idaho, which the U.S. Fish and Wildlife Service (Service) has stated it supports because it meets the conservation objectives required to prevent a listing under the Endangered Species Act (ESA) (see attached letter dated 4/10/2013).

The Governor's Plan provided the framework on where to focus IDL conservation efforts.

Some of the Service's recommendations on the Plan, if implemented, impose unreasonable constraints on the Land Board's ability and obligation to ensure endowment lands maintain their Constitutionally-derived purpose of generating maximum long-term financial returns to public schools and other state institutions. Also, the additional conservation measures recommended by the Service for inclusion in the Plan, specifically in sections 14 and 15, appear to be a departure from the Service's previously expressed endorsement of the Governor's Plan, which the IDL Plan complements.

Given the Constitutional mandate for management of endowment lands and the small percentage of endowment lands located in Core and Important habitat zones, IDL believes it is unnecessary and problematic that the State of Idaho manage its lands in the same way as federal land managers. The ESA recognizes that if/when species are listed then the federal government has an obligation to recover species, whereas State and private landowners have a duty to avoid take of a species. It is within the same vein that different management strategies are warranted on federal and state lands.

A response to the Service's comments on the IDL plan are found below, with the Service's comments italicized.

### **General Recommendation for IDL Lands and Programs Outside of Key Areas**

#### Section 4. Greater Sage-Grouse Management Areas

*The Plan notes that the State and Bureau of Land Management (BLM) are finalizing the delineation of the sage-grouse habitat zones (i.e. Core, Important and General Management Zones). The final Plan should fully adopt those final habitat zones to achieve state and federal sage-grouse conservation consistency across the landscape.*

IDL concurs with the Service's viewpoint that the Plan should adopt the final habitat zone delineation and nomenclature to achieve consistency across the state and federal sage-grouse landscape. While it is preferable to adopt the federal habitat zones delineation/nomenclature, it would not be prudent to adopt these zones if the Final Environmental Impact Statement (EIS) does not adhere to the three tiered habitat approach agreed upon in 2014, and if Idaho stays with the agreed upon system.

#### Section 7. Mitigation

*We recommend that all project proponents responsible for sage-grouse habitat impacts from infrastructure development be required to participate in the State's mitigation strategy. Compensatory mitigation associated with these direct and indirect sage-grouse impacts should result in a net conservation benefit to sage-grouse.*

IDL recognizes the need for a compensatory mitigation program to account for direct and indirect sage-grouse impacts associated with infrastructure development. The existing Idaho mitigation framework lacks the necessary detail for IDL to require mitigation from infrastructure development project proponents as you recommend. As a trust manager, it would not be prudent to commit to such a program until the details are known. We do note the Land Board has the authority to enter into conservation leases, so a mitigation program, once finalized is implementable on endowment lands. The State of Idaho currently is working to complete the mitigation program for greater sage-grouse.

#### Sections 8, 9, 10, and 11. Fire Prevention, Wildfire Suppression, Fuel Management, and Wildfire Restoration

*We recommend that the Plan include a commitment to cooperate and implement fire prevention, wildfire suppression, fuels management, and wildfire restoration actions on all IDL endowment lands consistent with U.S. Bureau of Land Management/U.S. Forest Service Fire and Invasives Assessment Team (BLM/FS FIAT) plans.*

IDL believes the current Plan adequately addresses your comment. IDL is further hopeful the BLM/U.S. Forest Service Fire and Invasives Assessment Team (BLM/FS FIAT) plans will identify and provide focus for these cooperative commitments. IDL will revise Sections 9-11 to incorporate reference to the FIAT plans.



Section 12. Habitat Restoration and Vegetation Management

*We recommend that the Plan include a commitment to identify priority restoration areas and to cooperate with other agencies and landowners in priority habitat restoration activities on all IDL endowment lands with emphasis on addressing perennial grasslands and juniper encroachment areas within the Core and Important Habitat Management Zones.*

IDL believes the current Plan adequately addresses your comment. IDL's prior and ongoing cooperative efforts with local and federal partners in post wildfire restoration and juniper removal projects is evidence of this. IDL is further hopeful the BLM/FS FIAT plans will identify and provide focus for these cooperative commitments. IDL will revise this section to incorporate reference to the FIAT plans.

Section 13. Invasive Plant Species

*We recommend a commitment to cooperatively implement invasive species management actions identified in the BLM/FS FIAT plans on all IDL endowment lands.*

IDL believes the current Plan adequately addresses your comment, especially since any large scale cooperative invasive species management actions are most likely to be part of a restoration project under Section 12. IDL is further hopeful the BLM/FS FIAT plans will identify and provide focus for these cooperative commitments.

Section 20. Implementation and Monitoring

*We recommend including a commitment that IDL will cooperate with the Idaho Department of Fish and Game, BLM and the U.S. Forest Service sage-grouse population and habitat monitoring on all IDL endowment lands.*

The draft Plan did not include any detail on implementation and monitoring. IDL is currently meeting with the Idaho Department of Fish and Game to develop a monitoring protocol/MOA. The IDL Implementation Plan will be included as an appendix in the revised Plan.

**Key Area Recommendations for IDL Lands and Programs**

Section 5. Adaptive Management

*In circumstances where BLM has determined a hard trigger has been tripped within a Biologically Significant Unit (BSU), we recommend temporary moratoriums be put in place on large-scale infrastructure development in the key areas associated with that BSU.*

IDL views this recommendation as a violation of the fiduciary trust responsibilities bestowed on the Land Board and IDL in managing endowment lands in accordance with the Constitutional mandate. IDL continues to support a general strategy aimed at reducing endowment ownership of Key Habitat within Core Habitat Zones through completion of land exchanges with the BLM. This strategy would provide the greatest levels of certainty for conservation of key sage-grouse habitat.

Section 6. Anthropogenic Disturbance

*To ensure impacts from anthropogenic disturbance are minimized, we recommend application of a 3 percent disturbance cap in the key areas. Absent a disturbance cap, we recommend a moratorium be placed on infrastructure development in key areas until such time that state/federal land transfers (Core and/or Important Habitat for General and/or Non-Habitat) are completed; thereby providing similar levels of protection on these lands through federal land management policy.*

IDL continues to support a general strategy aimed at reducing endowment ownership of Key Habitat within Core Habitat Zones through completion of land exchanges with the BLM. Due to the length of time that previous exchanges have taken, an open-ended moratorium is viewed as a violation of the Land Board and IDL's fiduciary trust responsibilities.

Section 9. Wildfire Suppression

*We recommend increasing capacity for fire suppression through: 1) commitments to establish IDL fire districts in or near the key areas, 2) commitments to establish and expand Rangeland Fire Protection Associations in or near the key areas, 3) commitment to cooperate and prioritize implementation of actions associated with the BLM/FS FIAT plans.*

Item 1 is beyond the scope of the Plan. The assessment, feasibility, and needs analysis to establish new IDL fire districts is a multiyear project requiring multijurisdictional coordination, legislative approval and funding.

Item 2: Rangeland Fire Protection Associations (RFPAs) are voluntary associations that are formed by interested landowners and are not directed or established by IDL. IDL provides guidance, personal protective equipment, and capital equipment to outfit the RFPAs. We can work with interested parties to educate them on the process required to form an RFPAs; however, the IDL cannot unilaterally form them. The State, via the Office of Species Conservation, will make funding available in FY2016 for existing RFPAs (equipment, training, etc.) and to offset some start-up costs for new RFPAs in key areas depending upon needs and priorities.

Item 3 is already addressed in the draft Plan, but we will incorporate a reference to the FIAT plans in our revision.

Section 10. Fuels Management

*In the key areas, fuels management treatments (including brush management) should specifically incorporate sage-grouse seasonal habitat guidelines recommended by the Governor's Task Force or those identified in the BLM/FS Land Use Plan amendments.*

IDL will include your recommendation specifically incorporating the Governor's Task Force seasonal habitat guidelines or those identified in the BLM/FS Land Use Plan amendments for fuels management treatments within the key areas.

Section 11. Wildfire Restoration and Rehabilitation

*In the key areas, restoration objectives should specifically incorporate sage-grouse seasonal habitat guidelines recommended by the Governor's Task Force or those identified in the BLM/FS Land Use Plan amendments. This should include a commitment to implement restoration using native species where available and practicable.*

IDL will include your recommendation specifically incorporating the Governor's Task Force seasonal habitat guidelines or those identified in the BLM/FS Land Use Plan amendments for restoration objectives within the key areas.

Section 12. Habitat Restoration

*In the key areas, habitat restoration objectives should specifically incorporate sage-grouse seasonal habitat guidelines recommended by the Governor's Task Force or those identified in the BLM/FS Land Use Plan amendments. This should include a commitment to implement restoration using native species where available and practicable. Depending on site-specific conditions, sage-grouse habitat treatments could include: mechanical or chemical sagebrush treatments, juniper removal, rangeland seeding, shrub planting, etc.*

IDL will include your recommendation specifically incorporating the Governor's Task Force seasonal habitat guidelines or those identified in the BLM/FS Land Use Plan amendments for restoration objectives within the key areas.

Sections 14 and 15. Infrastructure Development /Land and Realty, and Mineral Leasing

*We recommend avoiding all impacts to sage-grouse seasonal habitats for these land-use activities. Where it is not feasible to avoid all impacts, lek buffers are intended to minimize impacts to sage-grouse. The lek buffers identified below are our minimum distance recommendations within key areas. The following lek buffer-distances are specified as the lower end of the interpreted range in the USGS Report Conservation Buffer Distance Estimates for Greater Sage-Grouse - A Review (Open File Report 2014-1239):*

- *linear features (roads) within 3.1 miles of leks;*
- *infrastructure related to energy development within 3.1 miles of leks;*
- *tall structures (e.g., communication or transmission towers, transmission lines) within 2 miles of leks;*
- *low structures (e.g., fences, rangeland structures) within 1.2 miles of leks;*
- *surface disturbance (continuing human activities that alter or remove the natural vegetation) within 3.1 miles of leks; and*
- *noise and related disruptive activities including those that do not result in habitat loss (e.g., motorized recreational events) at least 0.25 miles from leks.*

*In lieu of these lek buffer-distances, a moratorium could be placed on infrastructure development in key areas until such time that state/federal land transfers (Core and/or Important Habitat for General and/or Non-Habitat) are completed; thereby providing similar levels of protection on these lands through federal land management policy.*

The Service recommends additional buffers around the identified leks in the key areas. These increased buffers would severely impact the Land Board and IDL's ability to manage and generate income from endowment lands. As an example, using the increased buffers

Michael Carrier  
April 3, 2015  
Page 6

suggested in Key Area 1, the usable surface decreased from 81 percent (146,472 acres) to only 37.6 percent (67,707). IDL cannot justify this level of reduced management and potential loss of revenue under the trust mandate under which IDL operates.

Section 16. Range Management/Livestock Grazing

*In the key areas, range management objectives should specifically incorporate the sage-grouse seasonal habitat guidelines recommended by the Governor's Task Force or those identified in the BLM/FS Land Use Plan amendments.*

IDL will be adding the Livestock Impact Conservation Measures from the 2006 Idaho Sage Grouse Plan into this section.

Lastly, IDL will be presenting its final recommendations for conservation measures on endowment lands and for IDL regulatory and assistance programs to the Land Board and Idaho Oil and Gas Conservation Commission for consideration in April 2015.

Thank you again for your timely response. We look forward to working with you during the implementation stage of IDL sage-grouse efforts.

Sincerely,

A handwritten signature in blue ink that reads "Thomas M. Schultz, Jr." in a cursive style.

Thomas M. Schultz, Jr.  
Director

Attachment: USFWS letter to Governor Otter, dated 4/10/13

cc: Jeff Foss, BLM Acting State Director  
Tom Perry, Legal Counsel to the Governor  
Noreen Walsh, USFWS



# United States Department of the Interior

## Fish and Wildlife Service

Idaho Fish And Wildlife Office

1387 S. Vinnell Way, Room 368

Boise, Idaho 83709

Telephone (208) 378-5243

<http://www.fws.gov/idaho>



The Honorable C.L. "Butch" Otter  
Governor of Idaho  
State Capitol  
Boise, Idaho 83702

**APR 10 2013**

Dear Governor Otter:

Thank you for your letter of March 14, 2013 requesting U.S. Fish and Wildlife Service (Service) "concurrence" in regards to Idaho's Greater sage-grouse (GRSG) conservation strategy (Strategy). Before the Service responds to this request, we would like to express our continued appreciation for your leadership in guiding the collaborative approach in which your staff in the Governor's Office, the Office of Species Conservation and the Idaho Department of Fish and Game has worked with us to refine the State's approach to conserving GRSG in Idaho.

The Service remains impressed with and supportive of the science-based adaptive conservation strategy for GRSG you have crafted collaboratively in Idaho, for Idaho-specific needs. In brief, the foundation of the Strategy and most of the specific elements that complete it, are solid and are grounded in scientific concepts and approach important to both the Service and Department of the Interior. While there is much about the current draft that the Service supports; there remain elements that need refinement, clarification, or need to be incorporated into the Strategy for the Service to conclude the entire strategy is consistent with the Service's Greater sage-grouse Conservation Objectives Team (COT) report.

A detailed response to your inquiry is attached. In summary, the integrated nature of the Strategy makes it difficult to "concur" with specific elements as most are interrelated and depend on other elements of the Strategy to function effectively. Nonetheless, our review revealed that the 4 foundational elements of the Strategy (Habitat Zones, Conservation Areas, Population Objective and Adaptive Triggers) are consistent with the COT as is the Livestock Grazing Management element. Therefore, this determination of consistency with the COT reflects "concurrence" for these elements, with the necessary elements noted in our detailed comments (see attachment), for the purpose of BLM IM 2012-043. This "concurrence" should not be construed as being automatically implementable by the BLM. The Service looks forward to working with your Task Force, and BLM as appropriate, to refine, clarify and add aspects of the Strategy as needed for similar support of, for example, the Wildfire Management and Infrastructure elements; and the Implementation Team/Commission. The latter, while an element of the Strategy that that

C.L. "Butch" Otter, Governor  
State of Idaho  
Request for State sage-grouse plan concurrence

needs clarity and refinement is an issue the Service believes is easily addressed. There are numerous examples of such bodies, including as the State has verbally referenced, the process used on the Idaho Roadless Rule. The Service looks forward to assisting the State craft such a process for the Strategy.

Conservation of GRSG is a challenge. It is a challenge due to the geographic scale of the issue; the need of the species for large intact undisturbed geographies of habitat; the difficult nature of the threats in the Great Basin portion of the range; and the relevance of the habitat in questions to myriad conservation and economic needs and interests. Long-term conservation of GRSG will require a strong and sustained commitment by stakeholders across multiple jurisdictions to work together collaboratively. It is for these reasons that the Service commends the State of Idaho for acknowledging and crafting a Strategy that on one hand details proactive conservation actions to address the threats on the landscape, but equally important embraces the uncertainty of how those threats will play out on the landscape and how they will affect GRSG over time by crafting a robust, outcome based scientific strategy that is collaborative and adaptive. This balance between proactive conservation design/actions based on empirical data and assumptions, with a feedback loop from monitoring to inform adaptation in design/action, with stakeholders in the decision loop as an integral part of that process, is a fundamental component of the both the Strategic Habitat Conservation approach the Service employs, and Adaptive Management that the Department of the Interior employs.

We hope this review is helpful. The Service looks forward to continuing our role in this process of on-going refinement of the Strategy, its implementation over time, and as part of the adaptive process it embraces.

Sincerely,



Brian T. Kelly  
Idaho State Supervisor

cc: Idaho BLM, State Director (S. Ellis)  
Idaho Department of Fish and Game, Director (V. Moore)  
Idaho Office of Species Conservation, Administrator (D. Miller)  
U.S. Forest Service, Region 4, Deputy Regional Forester (M. Finley)

## **ATTACHMENT**

### **Purpose of the Service's Comments**

We want to be clear regarding the purpose of our comments. First, our comments serve to continue the collaborative and iterative process we have been engaged in with you. We see this review as an important "check-in" and continuation of that process to ensure the Strategy is ultimately best positioned to contribute to a future where listing GRSG under the ESA is unnecessary.

Our comments also provide the requested feedback regarding "concurrence" as referenced in BLM Instructional Memorandum 2012-043. While the Service and BLM are both Department of the Interior Agencies, and we together with the State of Idaho and other partners, are collaborating in the conservation of GRSG; the BLM and Service have different legal authorities and policy requirements. As such, any "concurrence" we may offer on elements of the Strategy should not be construed a priori as being implementable by the BLM. That is a determination BLM must make. The Service acknowledges and respects BLM authority in this regard. The Service stands ready to assist the State and BLM in BLM's approval process where appropriate (e.g., Service review of elements of the Strategy that are modified to be implementable by BLM). Our comments on the Strategy at this juncture are not part of the on-going BLM process to amend and or revise various Resource Management Plans across the range of GRSG. That review process will be completed separately.

Service support of the Strategy in part or whole should not be interpreted as a decision by the Service commensurate with a listing decision under the Endangered Species Act (ESA). That determination will be made when the Service formally reviews the status of the species in 2015. However, our purpose in developing the COT report was to guide the States in the development of conservation actions and strategies so that when we review those efforts in 2015 they would contribute to the conservation of the species in a manner that collectively would address threats such that listing would not be necessary. It is for this reason, our review of the Strategy herein is provided in the context of the COT report.

### **Components of the Strategy**

We frame our review in the context of the three primary elements of the strategy: (1) Foundational Elements, (2) Specific Elements, and (3) Implementation Team/Commission. Foundational elements of the Strategy are those that transcend specific management and conservation actions or reactive adaptive processes once population or habitat triggers are tripped. We refer to four Foundational Elements: Thematic Approach, Conservation Areas, Adaptive Triggers, and Population Objective. Specific Elements identified in the Strategy are those that target specific threats including: wildfire, invasive species, and infrastructure, as primary threats; and recreation, West Nile virus, improper livestock grazing management, and livestock grazing infrastructure as secondary threats. The Implementation Team/Commission

referenced in the Strategy is meant to ensure proper action is taken when a trigger is tripped. As such, for the purposes of our review, we will evaluate the Implementation Team/Commission as a separate operational element of the strategy.

## **Foundational Elements**

Our review of the Strategy revealed a thoughtful, science-based and outcome-driven adaptive management approach to the conservation of GRSG in Idaho. This approach is consistent with the COT report. The Thematic Approach, Conservation Areas, Adaptive Triggers, and Population Objectives are consistent with the COT report and the Service strongly supports these aspects of the State's Strategy.

Examples of how the four Foundational Elements of the Strategy are consistent with the General Conservation Objectives and Specific Conservation Objectives related to Priority Areas for Conservation (PACs) in the COT report include:

1. The designation of a Core Habitat Zone (CHZ) of approximately 5.5 million acres which by itself is currently home to approximately 73% of the male GRSG in Idaho. The CHZ captures the COT report intent of avoiding development in priority areas for conservation (PACs). The Strategy reflects that the development of infrastructure (a primary threat to GRSG) is prohibited in CHZ; with a process for limited exceptions. The Service commends the State for ensuring that any exceptions to the prohibition to infrastructure in CHZ, must meet the conservation standard in the Important Habitat Zone (IHZ; see discussion in next paragraph). While we support the configuration and intent of the CHZ, we look forward to working with the State to clarify how exceptions are determined and specific mitigation strategies if exceptions occur are implemented (see Specific Elements and Implementation Team/Commission headings, below).
2. The designation of an Important Habitat Zone (IHZ), of approximately 4 million acres which by itself is currently home to 22% of the male GRSG in Idaho. The IHZ also captures the COT report intent of stopping the population decline in that while infrastructure is permitted; it is permitted in a way that must demonstrate it will not affect the population trend for the Conservation Area in question. IHZ serves an equally important role in the Strategy as it can serve to buffer loss of habitat due to fire (see #5).
3. The Strategy's use of a measureable population objective, and utilizing monitoring to ensure that objective is met; and setting metrics that trigger changes in practices or review of current practices to ensure the Strategy's conservation objective is met long-term.
4. The use of four separate Conservation Areas in which the adaptive triggers are individually applied adds an increased level of sensitivity to change, that we expect to translate to more timely changes in management if necessary, which will translate to an enhanced ability to ensure the population objective of the



Strategy is met state-wide (the Service appreciates and concurs with the State's desire to have additional peer review of the adaptive triggers).

5. The use of a "hard trigger" that, if tripped, requires IHZ be managed as CHZ, with infrastructure development subject to the same standards in both zones. In essence, if applied to all Conservation Areas, the CHZ would almost double in size. This would add the conservation benefit of CHZ to IHZ until no longer necessary.
6. The COT report also references the importance of incentive-based conservation actions in developing a conservation strategy. The foundational elements of the Strategy provide a context for incentivizing actions to maintain population numbers and intact habitat; and help ensure the conservation and restoration of GRSG in Idaho. The structure of these foundational elements of the Strategy (and specific elements consistent with the COT report and others as they are refined) will help provide stakeholders predictability with regard to GRSG conservation needs.

### **Specific Elements**

*Livestock Grazing Management:* This specific element of the Strategy is consistent with the COT report. The Service supports this aspect of the Strategy because it requires Idaho Rangeland Health Standards (IRHS) be met and it does so in the context of the Strategy. The COT report identifies that if the riparian (IRHS 2) and upland (IRHS 4) rangeland health standard is met, that is the minimum needed to address the threat of grazing on GRSG based on our expertise under the ESA. To achieve this, the Strategy provides an adaptive management process by which adjustments in grazing based on ecological site potential and habitat characteristics would be prioritized as needed outside of normally scheduled permit renewals based on population triggers and cause of declines within each Conservation Area in the Strategy. Additionally, the adaptive management approach the Strategy provides an important framework for deciding what, in addition to IRHS 2 and 4, might be required under IRHS 8 (Threatened, Endangered or Sensitive Species) for GRSG conservation.

As noted above, the COT also references the importance of incentive-based conservation actions in developing a conservation strategy. The Service believes the Livestock Grazing Management Element address the conservation needs of GRSG while providing an important incentive to permittees to be good stewards.

An additional important benefit to the Service of the Livestock Grazing Management element is that the regulation of improper grazing as a threat to GRSG when permits had not yet been analyzed by BLM to meet IRHS for GRSG (IRHS 2, 4; and 8 as needed) would be accomplished through the Strategy on an as needed basis based on population status. This approach is in contrast to requiring all individual permits be conditioned to meet IRHS 2, 4 and 8 (as needed), by the time the Service makes its listing determination—a goal that is likely not achievable. To be clear, the Service supports

adherence to IRHS. Our support for the approach of this element is due to it being a wise approach for regulating the appropriate conservation action for the secondary threat of improper grazing to GRSG where needed, until IRHS necessary for GRSG conservation are achieved at the management area scale. This adequacy of regulatory mechanisms under ESA is an important consideration. Pending more clarity in how the Implementation Team/Commission is staffed and operates once a trigger is tripped; the Service would expect to fully support this element of the Strategy. While we would defer to the BLM on their permit-specific application of these triggers in the context of requirements to enhance and restore rangelands under Federal Lands Policy and Management Act (FLPMA), the Service supports the Livestock Grazing Element in the interim as long as no triggers have been tripped within a Conservation Area.

*Infrastructure:* The specific actions in the infrastructure element are consistent with the COT pending a clearer understanding how the Implementation Team/Commission operates to determine exceptions to CHZ development, development in IHZ, and how referenced mitigation of impacts will work.

*Mitigation:* Mitigation is referenced in multiple elements in the Strategy but there is no explanation of the how mitigation for impacts in CHZ, IHZ and potentially GHZ will work. The Service is aware of preliminary work by your Task Force and the work of the Idaho Sage-grouse Advisory Council and this element and encourages the State to build on these efforts for this element of the Strategy.

*Restoration:* The Service recognized in our letter of August 1, 2012, that one of the many strengths of the Strategy is that habitat in need of restoration was included in and adjacent to CHZ as a priority commitment for restoration and to expand Core habitat. However, the Strategy is largely silent on the important relationship between mitigation and restoration for restoration to occur; what constitutes habitat that is lost versus gained back; and restoration monitoring. The need for how direct and indirect loss of habitat is quantified and what constitutes restored habitat is a missing component of the habitat trigger as well.

*Wildfire Management:* Wildfire and invasive species associated with fire are the greatest threat to long-term persistence of GRSG in the Great Basin and the threat most difficult to manage. The Strategy has been refined to help manage this threat in a significant way. The addition of legislative changes and funding to support the creation of Rural Fire Districts (RFDs) is a significant addition to the Strategy and one the Service supports and that is consistent with the COT report. Viewing wildfire management in the context of Prevention, Response and Restoration and tailoring actions within each is likewise an important refinement. The Service looks forward to working with the State and other partners to help establish more RFDs; and to identify more specific actions under each category of Prevention, Response and Restoration.

One aspect of the strategy that is not a specific fire management action but that the Strategy notes and the Service likewise acknowledges as one of the strongest attributes of the Strategy is how the overarching construct of the Strategy is designed with fire in

mind. The conservation objective of maintaining between 95% and 73% of the males on leks, the establishment of refined habitat triggers that catch declines and adapt practices earlier and by Conservation Area, the identification of areas in need of restoration, the commitment to IRHS are all mechanisms to reduce fire, buffer the effects of fire, and provide for refinement in management in an adaptive construct to reduce the effects of fire in the long term.

*Management on non-Federal Property:* The Strategy to date has focused on Federal properties. This is understandable due to the ongoing Resource and Land Use Management Plan revisions and amendments underway by BLM and the U.S. Forest Service. The Service looks forward to working with the State to ensure the Strategy applies where necessary and appropriate to all properties with adequate state or local regulatory mechanisms.

### **Implementation Team/Commission**

Many of the specific elements of the Strategy are in the Service's view conditionally consistent with the COT pending more clarity how the Implementation Team/Commission is staffed and operates; and how it interacts with scientific support. Because the Strategy is an outcome-based, adaptive strategy, its efficacy is achieved through a balance between proactive actions and reactive steps to adapt and or change actions if necessary. Therefore, the Service needs to understand in more detail how the Implementation Team/Commission functions to evaluate data and inform decisions to adapt management that ensure the Strategy objective is met (e.g., see Infrastructure, above).

### **Summary**

In summary the Strategy is a robust approach to conserving GRSG in the Great Basin. Many components of the Strategy are strong, in particular the underlying foundational elements and grazing management; with wildfire and infrastructure similarly strong pending additional clarity and refinement as noted. The State of Idaho and the stakeholders on the Governor's Task Force have done remarkable work in a compressed timeframe as these aspects of the plan address threats to GRSG in the Great Basin in a way that gives the Service more regulatory certainty, stakeholders more operational certainty, and provides for the conservation of GRSG and sage-brush in Idaho that helps ensure more resiliency to large wildfires. The elements of the Strategy that the Service would welcome more conversations with the State to refine, add or clarify in the Strategy include non-federal properties, restoration, mitigation, and the operation of the Implementation Team/Commission.



C.L. "BUTCH" OTTER  
GOVERNOR

May 1, 2015

Dan Ashe, Director  
U.S. Fish and Wildlife Service  
U.S. Department of the Interior  
1849 C Street NW, Room 3331  
Washington, D.C. 20240-0001

Dear Dan,

The state of Idaho (State) reinforced its strategy to conserve greater sage-grouse (GRSG) and its habitat last month with the approval of additional conservation measures on State endowment trust lands and activities that fall under Idaho Department of Lands (IDL) regulatory and fire-related authorities.

The Idaho State Board of Land Commissioners (Land Board) approved the GRSG Conservation Plan (Land Board's Plan) on April 21, 2015. The Idaho Oil and Gas Conservation Commission (Commission) approved the Land Board's Plan on April 23, 2015. Included with this correspondence is a copy of the Land Board's Plan for your review.

The Land Board's Plan was developed with input from natural resource industry user groups, environmental organizations and relevant State and federal agencies. It is important to point out, however, that the implementation of the Land Board's Plan is contingent upon the incorporation of the foundational elements of the federal alternative (which is my plan) into the relevant Resource Management Plans (RMPs) in Idaho.

In addition to a landscape conservation approach for GRSG within the Land Board's Plan, the State of Idaho has backed up its commitment to GRSG conservation with a legislative appropriation of \$750,000 for additional conservation activities in Idaho. Some of this funding will be applied to projects on State endowment lands.

The State of Idaho has been proactive and collaborative in our efforts to conserve GRSG and its habitat in Idaho while maintaining working landscapes and the economic vitality of the State. These efforts demonstrate Idaho's commitment to the conservation of this iconic western species.

As always – Idaho, "Esto Perpetua"

A handwritten signature in black ink that reads "C.L. Butch Otter".

C.L. "Butch" Otter  
Governor of Idaho

**Ralston, Brent E**

---

**From:** Jirik, Steven J  
**Sent:** Friday, April 06, 2012 2:16 PM  
**To:** Ralston, Brent E  
**Cc:** Makela, Paul D  
**Subject:** RE: task force bullets  
**Attachments:** 2Writeup for Brent 040512.docx

Here you go Brent. It only took me a little over a page to figure out how to solve the cheatgrass problem.

---

**From:** Ralston, Brent E  
**Sent:** Thursday, April 05, 2012 12:23 PM  
**To:** Makela, Paul D  
**Cc:** Knauth, Kevin S; Jirik, Steven J  
**Subject:** RE: task force bullets

Here are those question electronically.

Brent Ralston  
Sage-Grouse Project Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Makela, Paul D  
**Sent:** Thursday, April 05, 2012 12:22 PM  
**To:** Ralston, Brent E  
**Subject:** task force bullets

Brent  
Can you shoot me the list of questions for the task force? Will save having to type them...can copy/paste.

P

*7. How can we best restore burned areas and areas already converted to non-native (invasive annual grasslands)?*

Restoring sagegrouse habitats which have crossed the threshold into fire maintained invasive annual grasslands is difficult, expensive, and often unsuccessful as evidenced by the continuing expansion of invasive annual grass communities throughout the Great Basin. In spite of ones best efforts, moisture unpredictability from year to year often results in seeding failure, necessitating costly retreatments.

Essential for revegetating these areas is the ability to control invasive annual grass competition, followed by seeding plant materials which can compete effectively with these annual grasses and persist over time in these arid environments.

Herbicides have proven to be the most effective and noninvasive method for controlling annual grasses prior to seeding. Glyphosate (Roundup) is effective, but because it is a contact herbicide, application timing must be specific. Repeated treatments are often required when multiple cheatgrass crops germinate in a given year. Selective soil applied herbicides such as imazapic (Plateau) and sulfometuron methyl (OUST) are most effective and have the added benefit of not harming established perennial grasses, shrubs, and most forbs.

Research on cheatgrass specific fungi and bacteria also show some promise and may prove to be effective future control methods.

Selecting plant materials which can persist in these droughty environments, compete with invasive annual grasses, and persist over time is also essential for long term restoration success. Sagebrush is always seeded on its respective sites. Native grasses and forbs are preferred over introduced species when they can meet the above requirements. New selections are being increasingly developed which can establish in more productive sites with adequate rainfall (greater than 10 inches per year), and especially in recently burned sagebrush communities. However, native perennial grass materials are not widely available nor successfully established in dryer environments.

However, restoring native plant communities in repeatedly burned annual dominated grasslands has proved largely unsuccessful. Considerable speculation and research has attempted to understand why. A lack of mircorhiza, soil nutrients, and other changes to the soil environment from years of invasive annual grass domination is believed to be at least partially responsible. "Assisted succession" is a suggested method for ultimately restoring these areas by revegetating resilient introduced species to break the fire cycle, remove annual grass dominance, and restore soil characteristics which may in time make the site more hospitable to restoring the native community. Accordingly, this is a long term costly process and requires multiple treatments over several years.

Livestock grazing occurs throughout BLM public lands in the subregion, and seeded areas must be rested from livestock use to become established, and then subsequently managed to maintain plant health and vigor. BLM policy typically prescribes a minimum two year or two growing season rest period (from livestock grazing), or until plant establishment objectives are met. In

many cases and during good years, this period of time is adequate for establishing vigorous introduced perennial grass species. However a true native restoration could require years of rest from grazing to become successfully established (depending on plant materials used and site characteristics). Such large scale treatments would have significant repercussions to grazing permittees.

Lastly, the ability to protect these areas from recurring fire is critical to maintaining the reestablished sagebrush component. Until the majority of annual grass dominated landscapes can be rehabilitated to less fire prone species, these short fire cycles will result in a continual loss of these investments, and in the remaining native sagebrush steppe communities.

Red text = new text added for use/consideration

Blue text = suggesting this text/topic be moved to another appropriate section

~~Strikeout~~ = delete this text

Blank field in the NCT NOTES column = no comment/edits/revision noted

When speaking to making specific changes to the FEIS, keep the focus on referencing the reader to the section where the changes were made. Include statements similar to "see Section X.XX of the FEIS for the specific changes made" or "The FEIS was updated to include commenter noted updates" or other similar statement. Always include the section number where the reader will find the changes. If have an example or two to illustrate the point, include that, but avoid excessive laundry lists of changes made to the FEIS.

The laundry lists are probably a result of responding comment by comment and using the comment matrix to help track the changes that do need to be made in the FEIS. The comment matrix is part of the decision file and can be used for "showing our work" that comments were considered and specific changes made to the FEIS. However, that level of specificity is not always necessary in the Where text sounded more like tech edit to the document we marked it or provided suggestion to delete it from this comment analysis document. If it's just an edit, it doesn't need a formal response. All edits can be addressed in the general report/appendix/document intro text as something like, "BLM has reviewed and made changes to the FEIS based on commenter input, including corrected definitions, technical edits, or wording clarifications."

Ensure that all responses referencing the FEIS are written in the past tense. E.g., "The FEIS was updated..." rather than "The FEIS will be updated..." Write it as if the public is reading the published version of the responses.

When saying that the FEIS/DEIS met the NEPA standard, include a cross reference to appropriate NEPA (tab 4) section. In other word, instead of repeating the same Range of Alternatives intro language for each resource topic range of alternatives, simply say, "As noted in section 4.3, NEPA Range of Alternatives, of this report, the alternatives, including the management actions for the XXX program meet the purpose and need for the EIS. "

Same idea for other sections of the NEPA document, Best Available information, impact anlysis, cumulative analysis, etc.

Ensure that the impact analysis is "flowing" in the same direction for all topics. For example, if the issue statement says "BLM didn't address impacts from mining actions on sage grouse", then the team should make sure the issue and response is in the sage grouse impacts analysis tab. If it's in the mining impacts tab, it should be moved to SG.

Reference back to the DEIS or FEIS sections with section numbers, not page numbers. Makes future technical editing easier to follow. E.g., "Additionally, the references sited in the Fire and Fuels affected environment were updated to reflect the new informaton provided by commenters. See Section XX of this FEIS."



For any response where you need to address the issue of budget cost analysis use this:

As a landscape level planning effort, none of the alternatives prescribe project-level or site-specific activities on BLM or USFS managed lands. Furthermore, the agencies' selection of an alternative does not authorize funding to any specific project or activity nor does it directly tie into the agencies' budgets as appropriated annually through the Federal budget process. As a consequence, agencies' costs and differences in program costs across alternatives have not been quantified. Information has been presented in several resource impact sections on the types of costs that might be associated with various sage-grouse conservation measures.

For issues related to PECE, use this information:

When applying the ESA five-factor (particularly regulatory mechanisms) and PECE analysis to the BLM and FS plan decisions, the decisions in the plans will be evaluated based on the certainty of effectiveness that those decisions will contribute to the elimination or adequate reduction of one or more threats to the greater sage-grouse.

[http://www.sagebrushsea.org/esa/FWS\\_PECE\\_q&a.pdf](http://www.sagebrushsea.org/esa/FWS_PECE_q&a.pdf)

This link is to a USFW Q&A paper that informs the PECE policy.

## National Response

Adaptive management is a systematic approach for improving resource management by learning from management outcomes. An adaptive approach involves exploring alternative ways to meet management objectives, predicting the outcomes of alternatives based on the current state of knowledge, implementing one or more of these alternatives, monitoring to learn about the impacts of management actions, and then using the results to update knowledge and adjust management actions.

Incorporating adaptive management into the [insert name of plan] will help ensure a high degree of certainty that the decisions in the plan will effectively contribute to the elimination or adequate reduction of one or more threats to the greater sage-grouse and its habitat.

The agencies will use the data collected from monitoring (Appendix X) to identify any changes in habitat conditions related to the goals and objectives of the plan. The BLM/FS will use the information collected through monitoring to determine when adaptive management triggers are met. The adaptive management soft and hard triggers and land use planning responses to these triggers are in [insert management action where the triggers and responses are referenced].

Soft triggers represent an intermediate threshold indicating that management changes are needed at the project/implementation level to address habitat and population losses. Hard triggers represent a threshold indicating that immediate action is necessary to stop a severe deviation from greater sage grouse conservation

## National Response

Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with the BLM's Regional Mitigation Manual MS-1794, Forest

## NOTES

Several topics have issue statements related to "BLM needs to consider more/adequate/additional/etc. mitigation." For most of these issue statements, it sounds like BLM needs to consider/disclose the mitigation strategy to address impacts from that resource/use on sage grouse. In such cases, the national mitigation response is appropriate. When the issue statement speaks more about additional topic specific mitigations to address impacts from the SG or other management actions on that resource/use, then it may not be appropriate to respond with the national mitigation language. Closer review of the issue/response in the XX.5 sections is needed.

## National Response

## Monitoring / Disturbance Caps Language

The Monitoring Framework in Appendix X outlines the methods that the BLM and USFS will use to monitor habitats and evaluate the implementation and effectiveness of the planning strategy to conserve the species and its habitat. The regulations for the BLM (43 CFR 1610.4-9) and the USFS (36 CFR part 209, published July 1, 2010) require that land use plans establish intervals and standards, as appropriate, for monitoring and evaluations, based on the sensitivity of the resource to the decisions involved. BLM and USFS will use the methods described in Appendix X to collect monitoring data to evaluate implementation and effectiveness of the Greater Sage-grouse planning strategy and the conservation measures contained in land use plans.

To ensure that the BLM and USFS have the ability to make consistent assessments about sage-grouse habitats across the range of the species, the framework in Appendix X provides the methodology for monitoring the implementation and evaluating the effectiveness of BLM/USFS actions to conserve the species and its habitat through monitoring that informs effectiveness at multiple scales.

Implementation monitoring results will provide information to allow the BLM and USFS to evaluate the extent that decisions from the BLM resource management plans (RMP) and USFS land management plans (LMP) to conserve greater sage-grouse and its habitat have been implemented. Effectiveness monitoring will provide the information to evaluate BLM and USFS actions to reach the objective of the planning strategy (BLM IM 2012-044), to conserve greater sage-grouse populations and habitats.

Monitoring efforts will include data for measurable quantitative indicators of sagebrush availability, anthropogenic disturbance levels, and sagebrush conditions. This information will assist the BLM and USFS with identifying whether or not they are achieving their land use plan goals and objectives, as well as providing information

Use this tab to address the disturbance and cap information  
how formulated; the science behind  
how to implement  
tracking  
monitoring disturbance  
evaluating disturbance

- OR
- 2) Commenters also requested clarification of the 3 percent disturbance cap, including the following:
- The methods by which the 3 percent level was decided.
  - The current level of disturbance in the planning area.
  - What specific activities will count towards the disturbance, including if transmission line disturbance, temporary construction disturbance, water developments, range improvements, and conversion of sage brush to crop/pasture will count towards the disturbance cap.
  - The order of approval for applications for surface disturbing uses.
  - The feasibility of the 3 percent disturbance cap and how it will be implemented.
  - How the disturbance cap will impact development on private lands.

UT 4. Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to demonstrate more range in the disturbance cap amounts presented in the alternatives. There is also no discussion of how this disturbance cap will be implemented.

ID d. Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to demonstrate more range in the disturbance cap amounts presented in the alternatives.



NV-CA 3. The disturbance cap:

NWCO 4. Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to demonstrate more range in the disturbance cap amounts presented in the alternatives.

Lewisto 3. Commenters believed that the DRMPA/DEIS needed  
wn additional explanation for the methodology for establishing the disturbance cap in the alternatives, as well as better explanation for how the actions would be implemented. The BLM needs to show the differences between disturbance cap amounts presented in the alternatives. Fire should be added as a contributing factor in accounting for the disturbance cap.

ND

2) Ample literature establishes a relationship between disturbance and GRSG occupancy and persistence. Two papers in particular establish thresholds of disturbance related to development and GRSG persistence. See Section 4.2, specifically references to Kirol 2012 and Knick 2013 [Note: Check these references with Glenn], which are recent studies done on disturbance thresholds and GRSG. Based on this literature, the alternatives consider a range of appropriate disturbance caps.

While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried GRSG habitat with the best available info at the time of the DEIS, but would also perform additional in-depth analysis & inventory within Utah management zones at the implementation stage. The BLM has added a preliminary disturbance inventory to more accurately assess current disturbance levels and potential impacts across the planning area to Appendix G. This was completed through a collaborative process with the BLM, Forest Service, and USFWS, and included prioritization of management zone. [NOTE TO BLM: Review the previous sentence for accuracy.] In addition, the disturbance cap in the Final EIS was revised to provide additional detail such as enhanced descriptions of what types of activities would count towards the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored.

Future activities that are expected to cause disturbance, such as ROW/SUP applications, would be evaluated and approved on a case-by-case basis based upon site-specific determination of the ability to avoid, minimize, and/or mitigate impacts on GRSG habitat at the implementation phase. A proposed project's contribution to the amount of disturbance on the landscape would be evaluated during site-specific NEPA analysis.

Per requirements of NEPA, the BLM considers disturbance in private lands when making land use decisions since actions on private lands could impact the BLM's ability to manage for sage-grouse. So while the BLM cannot make planning or implementation decisions on private lands, the disturbance levels of nearby private lands will be considered in these planning process and future project-level decision. Clarifications to the document have been

4. In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative F focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations. Ample literature establishes a relationship between disturbance and GRSG occupancy and persistence. Two papers in particular establish thresholds of disturbance related to development and GRSG persistence. See Section 4.2, specifically references to Kirol 2012 and Knick 2013, which are recent studies done on disturbance thresholds and GRSG. Based on this literature, the alternatives consider a range of appropriate disturbance caps.

While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the ROD. The BLM inventoried the habitat with the best available info at the time of the DEIS, but would also perform additional in-depth analysis & inventory within Utah management zones at the implementation stage. The BLM and Forest Service have added Appendix XX [new appendix] with preliminary disturbance inventory to more accurately assess current disturbance levels and potential impacts across the planning area. [NOTE TO BLM: EMPSi will update appendix number once it has been added to the FEIS.] This was completed through a collaborative process with the BLM, Forest Service, and USFWS, and included prioritization of management zone. [NOTE TO BLM: Review the previous sentence for accuracy.] In addition, the disturbance cap in the Final EIS was revised to provide additional detail such as enhanced descriptions of what types of activities would count towards the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored.

Future activities that are expected to cause disturbance, such as ROW/SUP applications, would be evaluated and d. In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations.

For Alternative C, conservation measures were mostly focused on ADH (PPH, PGH, and linkage/connectivity habitat). These areas have been identified by CPW in coordination with respective BLM offices, and include a 3-percent cap on disturbance in ADH. This disturbance cap number for Alternatives B and C were incorporated as-is from the NTT Report and conservation group alternatives; the BLM did not modify the caps in the alternatives.

For Alternative D, the BLM intended to protect those areas that were most important for sage-grouse within PPH; in other words, the alternative would protect the best of the best habitat. The BLM utilized information from the Wyoming Core Strategy to support consideration of the five-percent disturbance cap, with the goal to represent the reasonable edge of the range of alternatives with a higher percentage.

While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried the habitat with the best

### 3. Disturbance Cap

In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations.

[NOTE TO BLM: Input specifics about how the disturbance cap was determined for each alternative. Example: 3% cap came from NTT report.]

In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations.

For Alternative C, conservation measures were mostly focused on ADH (PPH, PGH, and linkage/connectivity habitat). These areas have been identified by CPW in coordination with respective BLM offices, and include a 3-percent cap on disturbance in ADH. This disturbance cap number for Alternatives B and C were incorporated as is from the NTT Report and conservation group alternatives; the BLM did not modify the caps in the alternatives.

For Alternative D, the BLM intended to protect those areas that were most important for sage-grouse within PPH; in other words, the alternative would protect the best of the best habitat. The BLM utilized information from the Wyoming Core Strategy to support consideration of the five-percent disturbance cap, with the goal to represent the reasonable edge of the range of alternatives with a higher percentage.

While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried the habitat with the best 3. [NOTE TO BLM: clarifications and changes to the disturbance cap in the FEIS will likely come from the National Policy Team. Will likely need to include explanation of the changes made and rationale for changes.]





See other  
responses to the  
disturbance cap  
issue.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	The FEIS needs to identify an
MT	Environmentally Preferred Alternative, evaluate the plan according to the USFWS's Evaluation Criteria for Conservation Plans, and provide a summary comparison of the population effects under each alternative.
NV-CA	Commenters assert that the DEIS does not comply with the statutory requirements of the National Environmental Policy Act, and subsequent related case law that combined require agencies involved in preparing environmental documentation to take a 'hard look' at the effects of a proposed action, use scientifically sound information, and consider the possible conflicts of a proposed action with other laws, regulations, and planning processes.
NWCO	n/a
Lewiston	The BLM has not provided consistency
WY9	between all the subregional efforts; there are vastly different proposed management prescriptions to conserve the species.
ND	n/a
WY9	



## Response

n/a

n/a

1. FEIS will identify an Environmentally Preferred Alternative per CEQ regulations.

2. NOTE TO BLM: Is there a requirement to evaluate the plan (assuming Proposed Plan) to the USFWS's Eval Criteria? Is this something that may be done as part of the agreement with USFWS? If not, should include rationale for why not.

3. May already be included in the Summary of Impacts table at the end of chapter 2. If so, include reference to this for the reader.

n/a

While there was consistent direction provided in alternative development, such as BLM WO IM 2012-044, variation across sub-regionals was needed to accommodate the local issues and specific state requirements. The best available science will guide GRS objectives utilized for all sub-regions.

n/a



Plan	Issue Statement
OR	The BLM needs to include project stakeholders in a collaborative process during the creation of the RMPA, and needs to include a complete listing of commenters on the Draft EIS, the number of commenters that are in favor of or against any particular alternative, and what changes resulted from the comments.

UT BLM needs to include a complete listing of commenters on the Draft EIS, the number of commenters that are in favor of or against any particular alternative, and what changes resulted from the comments.

ID-SW BLM needs to publish the statistics for  
MT people that provided comment letters on the Draft EIS, as well as the comments, their responses, and changes made to the document in the FEIS .

NV-CA The BLM gave inadequate notice to the public about the intent to amend the Land Use Plan and in a manner that identifies the negative impacts to the regional and local economies and cultures.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

At multiple stages in the creation of the RMPA/DEIS, the BLM gathered and incorporated public comments during formal comment periods, which included public scoping and meetings before the Draft EIS began and during the public comment period and public meetings that occurred after the Draft EIS was published. All public entities were invited to comment during these formal comment periods, including individuals, organizations, businesses, and local, state, federal, and tribal government entities. Scoping and allowing comments on the Draft EIS is a requirement of the NEPA regulations (40 CFR 1501.7 and 1503) and the BLM planning regulations (43 CFR 1610.2 and 43 CFR 1610.4-1). The intent of these public comment periods is to encourage collaborative public involvement through the process of developing the RMPA/EIS. Per the requirements of 43 CFR 1610.2(d), findings from scoping were documented in a scoping report issued in May, 2012. This report summarized the content of comments and identified major planning issues. Public input received during the scoping process was considered to ensure that all issues and concerns were addressed, as appropriate, in developing the alternatives. The planning team developed planning issues to be addressed in the RMPA, based on broad concerns or controversies related to conditions, trends, needs, and existing and potential uses of planning area lands and resources. See Section 1.5 for a detailed description of the scoping process and outcomes. The substantive comments collected during the public comment period for the Draft EIS were compiled, along with statistics on commenters and affiliations, associated issue statements and responses, and the location of changes to the document, and are included in the RMPA/Final EIS in Chapter XX [or Appendix XX], along with a complete explanation of the procedures followed for analyzing comments. These comments were reviewed to assess inadequacies and missing items from the Draft EIS, and changes were made to the Final EIS as appropriate. See Section XXX for additional details on the comment analysis process.

All substantive comments received on the Draft EIS were considered and reviewed for information that would result in changes to the document. Comments simply stating a preference for or against a specific alternative or opinions without reasonable bias were considered non-substantive since they do not meet the substantive comment requirement of BLM Handbook H-1790-1, Section 6.9.2.1. Form letters, or identical letters submitted by different commenters, were identified as part of the RMPA/DEIS comment response effort. Since these submissions are identical in nature, it is adequate for only one “master” form letter to be included as part of the comment response effort and reviewed

All substantive comments received on the Draft EIS were considered and reviewed for information that would result in changes to the document. Comments simply stating a preference for or against a specific alternative or opinions without reasonable bias were considered non-substantive since they do not meet the substantive comment requirement of BLM Handbook H-1790-1, Section 6.9.2.1. The substantive comments, along with the commenter and associated issue statements and responses, are presented in the Proposed LUPA/Final EIS in Chapter XX [or Appendix XX], along with a complete explanation of the procedures followed for analyzing comments. See Section XXX for additional details on the comment analysis process.

[NOTE TO BLM: Section/Appendix numbers will be updated by EMPSi once this section has been added to the FEIS.]

Form letters, or identical letters submitted by different commenters, were identified as part of the DLUPA/DEIS comment response effort. Since these submissions are identical in nature, it is adequate for only one “master” form letter to be included as part of the comment response effort and reviewed for substantive comments. All form letters will be entered into the project decision file and all commenters will be entered into the project decision file as having submitted a comment during the DLUPA/DEIS comment period.

[NOTE TO BLM: Waiting on direction from national team on how will changes be noted between the DEIS and FEIS. EMPSi will include language on this topic in this response.]

All substantive comments received on the Draft EIS were considered and reviewed for information that would result in changes to the document. Comments simply stating a preference for or against a specific alternative or opinions without reasonable bias were considered non-substantive since they do not meet the substantive comment requirement of BLM Handbook H-1790-1, Section 6.9.2.1. The substantive comments, along with the commenter and associated issue statements and responses, are presented in the Proposed LUPA/Final EIS in Chapter XX [or Appendix XX], along with a complete explanation of the procedures followed for analyzing comments. See Section XXX for additional details on the comment analysis process.

Index of parties, comments, and responses will be provided in the FEIS. Changes made to the EIS will be noted [NOTE TO BLM: how did you want to show the changes? Grey highlight, strike out, etc.?]

The BLM provided public notification as required by FLPMA 103(d), CEQ 40 CFR 1500-1508, and BLM 43 CFR 1600-1610. A press release was issued in July 2011 announcing a strategy to conserve sage-grouse and protect its habitat, followed by additional press releases in December 2011. Pursuant to NEPA requirements (40 CFR 1501.7) and BLM Planning Regulations (43 CFR 1610.2 and 1610.4-1) a Federal Register Notice of Intent (NOI) was published on December 9, 2011 announcing the beginning of a 60 day scoping period. The public was invited to participate in scoping meetings throughout the planning area, and provide comments during the scoping period which was scheduled to end on February 7, 2012 but was extended to March 23, 2012. Throughout development of the draft EIS the BLM has provided information through numerous methods including the Internet, news releases, and social media. Contact information is provided on the project website and interested parties have been encouraged to contact the BLM if they wish. In addition, after the Draft EIS was issued the BLM and USFS held seven workshops in December 2013 to provide information and answer questions about the Draft EIS. The meetings were announced through press releases to local television, radio, and newspapers.

Potential impacts to local economies and cultures are part of the analysis conducted during development of the EIS.

Should this be addressed here or in the socioeconomic section?

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	The BLM did not coordinate with state and local agencies that would be affected by the actions considered in the EIS, as required by NEPA and FLPMA. Several agencies requested cooperator status for review and revisions to the Final EIS.

ID-SW See note to BLM in response.  
MT

NV-CA The BLM did not coordinate with local agencies that would be adversely economically affected by the actions considered in the EIS. Additionally, the BLM did not coordinate with Elko County on the development of the EIS.

NWCO The BLM did not coordinate with state and local agencies that would be adversely economically affected by the actions considered in the EIS, including the City of Rifle and the Colorado River Fire Rescue Regional Fire Authority. Additionally, the BLM did not coordinate with Garfield County School District on development of the EIS.

Lewisto The BLM and Forest Service should work  
wn with local cooperating agencies if local field office objectives are developed in the future.

ND The USFWS should not be involved in the process of developing local objectives for Greater Sage-Grouse (GRSG) management because the GRSG is not a listed species and they have no authority over BLM land use decisions.

WY9

## Response

n/a

Both the CEQ and BLM Planning regulations define cooperating agency status, including what it is, who is eligible to become a cooperating agency, and how the lead agency should invite participation as a cooperating agency (40 CFR 1501 and 1508; 43 CFR 1601.0-5). Cooperating relationships are limited to government entities, state agencies, local governments, tribal governments, and other Federal agencies that have jurisdiction by law or special expertise. Additionally, per the regulations and BLM policy, there is no coordinating agency status (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 21 and 31, respectively). To be a cooperating agency, the local agency must meet the eligibility criteria set out in the regulations and policies. The specific role of each cooperating agency is based on jurisdiction by law or special expertise, which is determined on an agency-by-agency basis and identified in the Memorandum of Understanding.

Cooperating agency relationships are described in the Final EIS in Section 5.3, Cooperating Agencies. In December 2011, the BLM sent letters to 15 tribal governments inviting them to be cooperating agencies. The BLM also sent letters to 36 local, state, and federal agencies inviting them to participate as cooperating agencies for the LUPA/EIS. Subsequently, the State of Wyoming and 4 local government agencies in Wyoming requested and were granted cooperating agency status for the Utah Sub-regional LUPA/EIS effort, given the portions of two National Forests that overlap into Wyoming and their proximity to the Utah planning area. To date, 30 agencies agreed to participate on the EIS as designated cooperating agencies, 26 of which have signed Memoranda of Understanding with the BLM's Utah State Office (Table 5.1, Cooperating Agencies).

In addition to the BLM's invitations to a wide variety of agencies to participate as Cooperating Agencies, DOI regulations (43 CFR 46.225(c)) require the BLM, as lead agency, to consider any request by a government entity to participate as a Cooperating Agency (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 8-9). From the time that the Notice of Intent was published and throughout the development of the EIS, an agency could notify the BLM requesting Cooperating Agency status. Section 202 of FLPMA requires the BLM and Forest Service, to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located. NOTE TO BLM: In reviewing the comments, the theme among all of them is "BLM should work with cooperating agencies, recognize the work done with other groups, and notify the military when doing burns" which I would suggest are not something that would result in changes to the FEIS or actions; therefore, I would recommend not including this summary. I would suggest that if the information is not already in the FEIS, then you could provide further clarification of the role of cooperating agencies, additional discussions or work with other groups, or information of the follow up actions that would occur with cooperating agencies. If all of this information is already in the document, then the entire summary/response Both the CEQ and BLM Planning regulations define cooperating agency status, including what it is, who is eligible to become a cooperating agency, and how the lead agency should invite participation as a cooperating agency (40 CFR 1501 and 1508; 43 CFR 1601.0-5). Cooperating relationships are limited to government entities: state agencies, local governments, tribal governments, and other Federal agencies that have jurisdiction by law or special expertise (BLM Desk Guide to Cooperating Agency Relationships... Section 4, page 21).

[NOTE TO BLM: Elko County states they were listed as a coordinating agency but were not included in discussions.]

The BLM is working with Elko County as a Cooperating Agency under a signed MOU. Pursuant to FLPMA 202 (c)(9) the BLM engages in ongoing communication regarding coordination of land management activities with other state, local and Tribal governments.

Both the CEQ and BLM Planning regulations define cooperating agency status, including what it is, who is eligible to become a cooperating agency, and how the lead agency should invite participation as a cooperating agency (40 CFR 1501 and 1508; 43 CFR 1601.0-5). Cooperating relationships are limited to government entities: state agencies, local governments, tribal governments, and other Federal agencies that have jurisdiction by law or special expertise. Additionally, per the regulations and BLM policy, there is no coordinating agency status (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 21 and 31, respectively). To be a cooperating agency, the local agency must meet the eligibility criteria set out in the regulations and policies.

These relationships were described in the Draft EIS in Section 6.3, Cooperating Agencies (page 986). On January 20, 2012, the BLM wrote to 80 local, state, federal, and tribal representatives, inviting them to participate as cooperating agencies for the Northwest Colorado GRS G LUPA/EIS. Twenty-two agencies agreed to participate on the EIS as designated cooperating agencies, all of which have signed MOUs with the Northwest District Office (Table 6.1, Cooperating Agencies). The City of Rifle was one of the 80 invited agencies; however, the City did not accept the invitation. While the BLM did formally invite the State of Colorado, a specific participation invitation letter was not sent to the Colorado River Fire Rescue Regional Fire Authority.

In addition to the BLM's invitations to a wide variety of agencies to participate as Cooperating Agencies, the BLM published the following statement in the Notice of Intent, published in the Federal Register on December 9, 2011:

Federal, State, and local agencies, along with other stakeholders that may be interested or affected by the BLM's or FS's decision on this proposal are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate as a cooperating agency.

DOI regulations (43 CFR 46.225(c)) require the BLM, as lead agency, to consider any request by a government entity to participate as a Cooperating Agency (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 8-9). From the time that the Notice of Intent was published and throughout the development of the EIS, an agency could notify the BLM requesting Cooperating Agency status. However, the BLM did not receive this notification from the Colorado River Fire Rescue Regional Fire Authority or any other agency or entity [NOTE TO BLM: this sounds like a later implementation level action that they would like to be involved in. A response could address the programmatic nature of this document and defer any future commitments to cooperating agency status to later date. Here is some suggested language, modify as needed.]

As the decisions under consideration by the BLM and the Forest Service are programmatic in nature and would not result in on-the-ground planning decision or actions, the scope of the management actions were considered at a broad, programmatic level. As specific actions come under consideration, such as future local management actions to implement the broad objectives and goals presented here, the BLM and the Forest Service will conduct subsequent NEPA analyses that may include future coordination with local cooperating agencies. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions. Specifically, GRS G Objectives to be considered have been included in Appendix X Figure Appendix Maps, and will be analyzed during lead book

In March 2010, the US Fish and Wildlife Service (USFWS) published its listing decision for the Greater Sage-Grouse (GRSG) as “Warranted but Precluded” (75 Federal Register 13910, March 23, 2010). Inadequacy of regulatory mechanisms was identified as a major threat in the USFWS finding on the petition to list the GRSG under the Endangered Species Act (ESA). The USFWS has identified conservation measures in resource management plans (RMPs) as the principal regulatory mechanism for protecting GRSG on BLM-administered lands. In response to the USFWS findings, the BLM are evaluating the adequacy of its RMPs and will address, as necessary, amendments to RMPs throughout the range of the GRSG.

The Federal Land Policy and Management Act (FLPMA) and National Environmental Policy Act (NEPA) provide BLM managers with complementary directives regarding coordination and cooperation with other agencies and governments. FLPMA emphasizes the need to insure coordination and consistency with the plans and policies of other relevant jurisdictions. NEPA provides for what is essentially a cooperative relationship between a lead agency (here, BLM) and cooperating agencies in the NEPA process.

Both the Council on Environmental Quality (CEQ) and BLM Planning regulations define cooperating agency status, including what it is, who is eligible to become a cooperating agency, and how the lead agency should invite participation as a cooperating agency (40 CFR 1501 and 1508; 43 CFR 1601.0-5). Cooperating relationships are limited to government entities: state agencies, local governments, tribal governments, and other Federal agencies that have jurisdiction by law or special expertise. To be a cooperating agency, the local agency must meet the eligibility criteria set out in the regulations and policies. The CEQ defines cooperating agency in regulations implementing NEPA, particularly at 40 CFR 1501.6 and 1508.5. CEQ regulations specify that a Federal agency, state agency, local government, or Tribal government may qualify as a cooperating agency because of “. . . jurisdiction by law or special expertise.”

- 1) Jurisdiction by law means “. . . agency authority to approve, veto, or finance all or part of the proposal.” (40 CFR 1508.15)
- 2) Special expertise means “. . . statutory responsibility, agency mission, or related program experience.” (40 CFR 1508.26)





Plan	Issue Statement
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- |        |  |
|--------|--|
| OR 1/3 | <p>1) Commenters stated that the alternatives fail to meet NEPA adequacy because:</p> <ul style="list-style-type: none"><li>• One more of the alternatives fail to meet the purpose and need for the action.</li><li>• Alternatives were too similar and the BLM needs to provide a wider range of alternatives.</li><li>• The BLM needs to consider the alternatives presented by Cooperating Agencies including the County alternatives, the Conservation Groups' alternative (specifically the Harney County Soil and Water Conservation District Rural Community Alternative), and alternatives for the listing of the species or not listing the species.</li><li>• The BLM failed to adequately define the No Action Alternative and did not determine if the existing regulatory mechanisms are insufficient to protect the GRSG.</li><li>• The alternatives do not address the key threats to GRSG as listed by the USFWS, notably fires, invasive weeds, and juniper encroachment.</li><li>• CCAs and CCAAs have not been</li></ul> |
|--------|--|

- OR 2/3 2) Commenters also requested clarification of the 3 percent disturbance cap, including the following:
- The methods by which the 3 percent level was decided.
  - The current level of disturbance in the planning area.
  - What specific activities will count towards the disturbance, including if transmission line disturbance, temporary construction disturbance, water developments, range improvements, and conversion of sage brush to crop/pasture will count towards the disturbance cap.
  - The order of approval for applications for surface disturbing uses.
  - The feasibility of the 3 percent disturbance cap and how it will be implemented.
  - How the disturbance cap will impact development on private lands.



UT I/4 The comments were focused on several issues related to the alternatives presented in the Draft EIS:

1. Commenters believed that the preferred alternative does not meet the stated purpose & need.

2. Commenters felt that the alternatives were all largely the same, and that the BLM needed to provide more distinction (range) between the alternatives.

3. BLM needs to consider the alternatives presented by Cooperating Agencies and Environmental Organizations, including county proposed alternatives, the Sage-grouse Recovery Alternative, and alternatives for the listing of the species or not listing the species.

~~4. Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to demonstrate more range in the disturbance~~



UT3/4

UT4/4

ID-SW I. The alterantives fail to meet NEPA  
MT 1/3 adequacy because:

- a. they (indiividally or collectively) do not meet the purpose and need for the action
- b. alternatives were all largely the same, and that the BLM needed to provide more distinction (range) between them
- c. BLM needs to consider the alternatives presented by Cooperating Agencies and Environmental Organizations, including the County alternatives, the Conservation Groups' alternative, and alternatives for the listing of the species or not listing the species.
- ~~d. Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to demonstrate more range in the disturbance cap amounts presented in the alternatives.~~
- e. specifically that Alternative D needed to include the Ecological Site Descriptions to provide adequate understanding of the current management
- f. and the BLM and Forest Service failed to adequately define the No Action Alternative.

ID-SW  
MT 2/3



ID-SW  
MT 3/3

- NV-CA This category needs to be split into:
- 1/2
1. BLM needs to consider the other alternatives presented by Cooperating Agencies and Environmental Organizations.
  2. Consider an additional alternative
  - ~~3. The disturbance cap:~~
  4. Alternatives B, C, D, and F do not meet the purpose and need

NWCO The comments were focused on several issues related to the alternatives presented in the Draft EIS:

1. Commenters believed that the preferred alternative does not meet the stated purpose & need.
2. Commenters felt that the alternatives were all largely the same, and that the BLM needed to provide more distinction (range) between the alternatives.
3. BLM needs to consider the alternatives presented by Cooperating Agencies and Environmental Organizations, including the Garfield County alternative, the Sage grouse Recovery Alternative, and alternatives for the listing of the species or not listing the species.
4. ~~Commenters felt there was no methodology or scientific backing for establishing the disturbance cap in the alternatives, and that the BLM/FS needed to~~





Lewisto wn The comments focused on several issues related to the alternatives presented in the DRMPA/DEIS:

1. Commenters believed that the stated purpose and need is overly narrow, and that the goals and objectives presented in the alternatives would not meet the purpose for the action, namely conservation of the GRSG.

2. The BLM should modify the alternatives several ways, including changing the Conservation Alternative (Alternative C) to include only those elements that were provided by the conservation organizations, include a No Grazingreduced grazing alternative that included a 50% reduction in actual use, and an alternative that would not include universal closures and NSO stipulations to areas available for leasing.

~~3. Commenters believed that the DRMPA/DEIS needed additional explanation for the methodology for establishing the disturbance cap in the alternatives, as well as~~

ND BLM did not have an alternative that is less restrictive than no surface occupancy (NSO) in priority habitat (PH) and controlled surface use (CSU) in general habitat (GH), and less restrictive than no leasing. BLM is violating its responsibility to develop a balanced preferred alternative that incorporates multiple use concepts.

WY9

## Response

1) In accordance with NEPA, the BLM has discretion to establish the purpose and need for action (40 CFR 1502.13). CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM and the Forest Service are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook and Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook Chapter 10 – Environmental Analysis).

The BLM prepared the Oregon GRSR RMPA/EIS to be applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms in BLM land use plans was inadequate to protect the species and its habitat. The range of alternatives, including the preferred alternative and its components (such as the disturbance caps), focus on areas affected by threats to greater sage-grouse habitat identified by the FWS in the March 2010 listing decision. The primary threats to the sage-grouse across its range are habitat loss and fragmentation (including wildfire), invasive plants, energy development, urbanization and agricultural conversion and grazing. To address the threats, BLM considered a range of changes in management of greater sage-grouse habitats to avoid the continued decline of populations and habitats across BLM-administered lands. This purpose and need provides the appropriate scope to allow the BLM to analyze a reasonable number of alternatives to cover the full spectrum of potential impacts. Formulated by the planning team, the preferred alternative represents those goals, objectives, and actions determined to be most effective at resolving planning issues, balancing resource use at this stage of the process, and meet the stated purpose and need for action. While collaboration is critical in developing and evaluating alternatives, the final designation of a preferred alternative remains the exclusive responsibility of the BLM. See Section 2.13, Considerations for Selecting a Preferred Alternative, for further details.

The range of alternatives the BLM considered during the greater sage-grouse planning process in full compliance with the

The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. Based on this alternative development process, the BLM considered input from cooperating agencies and associated land use plans, environmental organizations, and the public. The resulting action alternatives offer a range of possible management approaches for responding to planning issues and concerns identified through public scoping, and to maintain or increase GRSG abundance and distribution in the planning area. The relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the five alternatives are described in Table 2-5, Summary Comparison of Resource Allocations in Greater Sage-Grouse Habitats, in Section 2.9, Comparison of Alternatives, of the Draft EIS.

A full description of Alternative A, including the current management and regulatory mechanisms in place, was included as Appendix B in the Draft EIS. These mechanisms are also analyzed throughout the RMPA/DEIS as Appendix A. Current management for sage-grouse or sagebrush habitats are highly variable due to the ages of the incorporated plans and relevant issues when those plans were written. The USFWS determined that "...existing regulatory mechanisms are inadequate...", as listed under Factor D in the USFWS 12-Month Findings for Petitions to List the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered (75 Federal Register 13910-14014, March 23, 2010). When possible, Alternative A was grouped by topic to facilitate comparisons between alternatives.

As described in 2.5.4, Alternative B, the BLM used the GRSG conservation measures recommended in NTT report, as appropriate, to create Alternative B. This is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).



Whether the Greater Sage-Grouse is determined for listing by the USFWS is outside the jurisdiction of the BLM and beyond the scope of this EIS. As noted in the Purpose and Need, the BLM was to consider regulatory mechanisms that would protect the species and its habitat. As such, the BLM did not develop alternatives should the USFWS choose to list or not list the Greater Sage-grouse.

Additional actions for managing wildland fire, invasive species, and juniper treatments have been added to the alternatives to more fully address these threats to GRSG in the FEIS. Language has been added to Appendix H clarifying how the wildland fire and invasive species assessments were conducted. Clarifications were added on linkages and connectivity between PACs and focal areas in Chapter 3. CCA and CCAs are not a land management action, but rather a programmatic agreement between the BLM, USFWS, NRCS, private landowners, and other local, state, and federal agencies. As such, they cannot be included in the action alternatives. However, they have been added as a RFFA in Chapter 5, along with a cumulative impacts analysis. [Note to BLM: Review this description]

~~2) Ample literature establishes a relationship between disturbance and GRSG occupancy and persistence. Two papers in particular establish thresholds of disturbance related to development and GRSG persistence. See Section 4.2, specifically references to Kiroi 2012 and Knick 2013 [Note: Check these references with Glenn], which are recent studies done on disturbance thresholds and GRSG. Based on this literature, the alternatives consider a range of appropriate disturbance caps. While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried GRSG habitat with the best available info at the time of the DEIS, but would also perform additional in-depth analysis & inventory within Utah management zones at the implementation stage. The BLM has added a preliminary disturbance inventory to more accurately assess current disturbance levels and potential impacts across the planning area to Appendix G. This was completed through a collaborative process with the BLM, Forest Service, and USFWS, and included prioritization of management zone. [NOTE TO BLM: Review the previous sentence for accuracy.] In addition, the disturbance cap in the Final EIS was revised to provide additional detail such as enhanced descriptions of what types of activities would count towards the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored. Future activities that are expected to cause disturbance, such as ROW/SUP applications, would be evaluated and approved~~

1. In accordance with NEPA, the BLM and Forest Service have discretion to establish the purpose and need for action (40 CFR 1502.13). CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM and the Forest Service are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook and Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook Chapter 10 – Environmental Analysis).

As stated in the DLUPA/EIS in Section 1.1, Introduction, the BLM and the Forest Service prepared the Utah LUP amendment with an associated EIS to be applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms in BLM and the Forest Service land use plans was inadequate to protect the species and its habitat. The range of alternatives, including the preferred alternative and its components (such as the disturbance caps), focus on areas affected by threats to greater sage-grouse habitat identified by the FWS in the March 2010 listing decision. Formulated by the planning team, the preferred alternative represents those goals, objectives, and actions determined to be most effective at resolving planning issues, balancing resource use at this stage of the process, and meet the stated purpose and need for action. While collaboration is critical in developing and evaluating alternatives, the final designation of a preferred alternative remains the exclusive responsibility of the BLM and Forest Service. See Section 2.9, Preferred Alternative, for further details.

As stated in Section 1.7, Development of Planning Criteria, the LUPA will recognize all valid existing rights. The potential impacts on valid existing rights from management decisions in this plan amendment are further discussed in Section 4.20, Minerals, and Appendix R, Oil and Gas Reasonably Foreseeable Development Scenario for Greater Sage-Grouse Occupied Habitat in Utah Sub-Region.

2. The BLM and Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and Forest Service fully considered the management opportunities presented in the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. In addition, question 2a of the Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations states that an EIS is required to examine all reasonable alternatives rather than all alternatives (CEQ 40 Questions). As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options which address the issues of sage-grouse protection, including a no action alternative (current management, Alternative A), up to a conservation of all occupied GRSG habitat within Utah (Alternative C). Additional alternatives suggested that fit within the range of alternatives are considered to have been adequately analyzed and were not addressed separately.

As described in Section I.5, Planning Processes, of the Draft EIS, the Utah GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable.

Public input received during the scoping process was considered to ensure that all issues and concerns would be addressed, as appropriate, in developing the alternatives. The planning team developed planning issues to be addressed in the RMPA, based on broad concerns or controversies related to conditions, trends, needs, and existing and potential uses of planning

The relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the six alternatives are described in Table 2.3, Summary Comparison of Alternatives by Decision, in Section 2.7, Summary Comparison of Alternatives, in the Draft EIS.

As part of the alternatives development process, only alternatives that are considered practical and feasible from a technical and economic standpoint were considered for analysis in the DLUPA/DEIS (CEQ 40 Questions). Some alternatives were considered, but eliminated from analysis for a variety of reasons. See Section 2.8, Alternatives Considered but Eliminated from Detailed Analysis, for explanations of these alternatives and why they were eliminated from consideration.

3. Based on this alternative development process, the BLM considered input from cooperating agencies, environmental organizations, and the public. As described in Section 2.1.2, Alternative B, the BLM used the GRSG conservation measures in A Report on National Greater Sage-Grouse Conservation Measures (NTT 2011) to form BLM management direction under Alternative B, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).

During scoping for the Utah GRSG RMPA/EIS, individuals and conservation groups submitted management direction recommendations for protection and conservation of GRSG and their habitat, including the Sage-grouse Recovery Alternative and proposed disturbance cap. The recommendations, in conjunction with resource allocation opportunities and internal sub-regional BLM input, were reviewed in order to develop BLM management direction for GRSG under Alternative C (Draft EIS, Section 2.1.3, Alternative C).

Alternative D incorporates adjustments to the NTT report (NTT 2011) to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses, and was developed in full cooperation with the Cooperating Agencies taking note of the agencies' concerns with socioeconomic issues.

Alternative E1 is based on the State of Utah's Conservation Plan for Greater Sage-Grouse in Utah, and would apply to all BLM-administered and National Forest System lands located in Utah. Alternative E2 is based on the State of Wyoming's Governor's Executive Orders 2011-05 and 2013-3 with adjustments by the BLM interdisciplinary team, which includes

4. In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative F focus primarily on GRSG PPH and include a 3 percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations. Ample literature establishes a relationship between disturbance and GRSG occupancy and persistence. Two papers in particular establish thresholds of disturbance related to development and GRSG persistence. See Section 4.2, specifically references to Kiroi 2012 and Knick 2013, which are recent studies done on disturbance thresholds and GRSG. Based on this literature, the alternatives consider a range of appropriate disturbance caps.

While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the ROD. The BLM inventoried the habitat with the best available info at the time of the DEIS, but would also perform additional in-depth analysis & inventory within Utah management zones at the implementation stage. The BLM and Forest Service have added Appendix XX [new appendix] with preliminary disturbance inventory to more accurately assess current disturbance levels and potential impacts across the planning area. [NOTE TO BLM: EMPSi will update appendix number once it has been added to the FEIS.] This was completed through a collaborative process with the BLM, Forest Service, and USFWS, and included prioritization of management zone. [NOTE TO BLM: Review the previous sentence for accuracy.] In addition, the disturbance cap in the Final EIS was revised to provide additional detail such as enhanced descriptions of what types of activities would count towards the disturbance totals, where disturbance activities would count against the cap, reclamation and habitat requirements for a disturbed area for both temporary and permanent disturbance, and how the cap would be implemented and monitored.

Future activities that are expected to cause disturbance, such as ROW/SUP applications, would be evaluated and approved on a case-by-case basis based upon site-specific determination of ability to avoid, minimize, and/or mitigate impacts on GRSG habitat at the implementation phase. A proposed project's contribution to the amount of disturbance on the landscape will be evaluated during site-specific NEPA analysis. Per requirements of NEPA, the BLM and Forest Service consider disturbance in private lands when making land use decisions since actions on private lands could impact the BLM's ability to manage for

1. a. In accordance with NEPA, the BLM and FS have discretion to establish the purpose and need for action (40 CFR 1502.13). CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM and the Forest Service are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook and Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook Chapter 10 – Environmental Analysis).

As stated in the DLUPA/EIS, the BLM and the Forest Service prepared the Idaho LUP amendment with an associated EIS to be applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010

b. The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

Additionally, the resulting action alternatives offer a range of possible management approaches for responding to planning issues and concerns identified through public scoping, and to maintain or increase GRSG abundance and distribution in the planning area. While the goal is the same across alternatives, each alternative contains a discrete set of objectives and

c. Based on this alternative development process, the BLM considered input from cooperating agencies, environmental organizations, and the public. As described in 2.4.2. Alternative B, the BLM used the GRSG conservation measures in A Report on National Greater Sage-Grouse Conservation Measures (NTT 2011) were used to form BLM management direction under Alternative B, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).

During scoping for the IDaho GRSG RMPA/EIS, individuals and conservation groups submitted management direction recommendations for protection and conservation of GRSG and their habitat, including the Sage-grouse Recovery Alternative and proposed disturbance cap. The recommendations, in conjunction with resource allocation opportunities and internal sub-regional BLM input, were reviewed in order to develop BLM management direction for GRSG under Alternative C.

Alternative D incorporates adjustments to the NTT report (NTT 2011) to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses, and was developed in full cooperation with the Cooperating Agencies taking note of the agencies' concerns with socioeconomic issues.

The BLM and Forest Service considered the State of Idaho's Sage-Grouse Conservation Plan in its cumulative effects analysis (Draft EIS Chapter 5, Cumulative Effects, Section 5.4, Special Status Species).

~~d. In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations. For Alternative C, conservation measures were mostly focused on ADH (PPH, PGH, and linkage/connectivity habitat). These areas have been identified by CPW in coordination with respective BLM offices, and include a 3-percent cap on disturbance in ADH. This disturbance cap number for Alternatives B and C were incorporated as is from the NTT Report and conservation group alternatives; the BLM did not modify the caps in the alternatives. For Alternative D, the BLM intended to protect those areas that were most important for sage grouse within PPH; in other words, the alternative would protect the best of the best habitat. The BLM utilized information from the Wyoming Core Strategy to support consideration of the five-percent disturbance cap, with the goal to represent the reasonable edge of the range of alternatives with a higher percentage. While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried the habitat with the best available info at the time of the DEIS, but would also do additional in-depth analysis & inventory within management zones at the implementation stage.~~

2. While FWS has responsibility for threatened and endangered species, the BLM and the Forest Service manage a significant portion of sage-grouse habitat. Thus, although it is the FWS's responsibility to administer the Endangered Species Act, management of wildlife habitat is within the BLM and the Forest Service's multiple-use mandate and is properly a resource to I. Alternatives:

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

2. Consideration of additional alternatives

[NOTE TO BLM: Was the Nevada Greater Sage Grouse Management and Conservation Strategy Plan considered and eliminated as an alternative? If it was considered and eliminated, site the location and summarize rationale. If it was not considered and eliminated, this may need to be added to the document.]

Didn't this become the basis of the States Alternative?

~~3. Disturbance Cap~~

~~In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations.~~

~~[NOTE TO BLM: Input specifies about how the disturbance cap was determined for each alternative. Example: 3% cap came from NTT report.]~~

#### 4. Alternatives do not meet purpose and need

In accordance with NEPA, the BLM and FS have discretion to establish the purpose and need for action (40 CFR 1502.13). CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM and the Forest Service are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook and Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook Chapter 10 – Environmental Analysis). As stated in the DLUPA/EIS at page 6, the BLM and the Forest Service prepared the Nevada-California LUP amendment with an associated EIS to be applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms in BLM and the Forest Service land use plans was inadequate to protect the species and its habitat. The range of alternatives, including the preferred alternative and its components (such as the disturbance caps), focus on areas affected by threats to greater sage-grouse habitat identified by the FWS in the March 2010 listing decision. Formulated by the planning team, alternatives represent those goals, objectives, and actions determined to be most effective at resolving planning issues, balancing resource use at this stage of the process, and meet the stated purpose and need for action. While collaboration is critical in developing and evaluating alternatives, the final designation of a

In accordance with NEPA, the BLM and Forest Service have discretion to establish the purpose and need for action (40 CFR 1502.13). CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM and the Forest Service are required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook and Forest Service Handbook 1909.15 – National Environmental Policy Act Handbook Chapter 10 – Environmental Analysis).

As stated in the DLUPA/EIS at page 6, the BLM and the Forest Service prepared the Northwest Colorado LUP amendment with an associated EIS to be applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms in BLM and the Forest Service land use plans was inadequate to protect the species and its habitat. The range of alternatives, including the preferred alternative and its components (such as the disturbance caps), focus on areas affected by threats to greater sage-grouse habitat identified by the FWS in the March 2010 listing decision. Formulated by the planning team and with input from the cooperating agencies, the preferred alternative represents those goals, objectives, and actions determined to be most effective at resolving planning issues, balancing resource use at this stage of the process, and meet the stated purpose and need for action. While collaboration is critical in developing and evaluating alternatives, the final designation of a preferred alternative remains the exclusive responsibility of the BLM and Forest Service. See Section 1.2



The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.14(a)) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. The CEQ regulations do not define "reasonable" alternatives, but do state that "the alternatives including the proposed action" are proposed to respond to "the underlying purpose and need" for the project (40 CFR 1502.13). The range of alternatives for a project proposal is thus normally limited to alternatives that meet the identified purpose and need. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. The CEQ regulations and Forest Service directives (FSM 1950 and FSH 1909.15) give the deciding official discretion to determine the appropriate range of alternatives and to select the alternative that best meets the stated purpose and need. As a result, four alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

As described in Section 2.3 of the Draft EIS, the Northwest Colorado GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. Public input received during the scoping process was considered to ensure that all issues and concerns would be addressed, as appropriate, in developing the alternatives. The planning team developed planning issues to be addressed in the RMPA, based on broad concerns or controversies related to conditions, trends, needs, and existing and potential uses of planning area lands and resources.

Based on this alternative development process, the BLM considered input from cooperating agencies, environmental organizations, and the public. As described in 2.4.2. Alternative B, the BLM used the GRSG conservation measures in A Report on National Greater Sage-Grouse Conservation Measures (NTT 2011) were used to form BLM management direction under Alternative B, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).

During scoping for the Northwest Colorado GRSG RMPA/EIS, individuals and conservation groups submitted management direction recommendations for protection and conservation of GRSG and their habitat, including the Sage-grouse Recovery Alternative and proposed disturbance cap. The recommendations, in conjunction with resource allocation opportunities and internal sub-regional BLM input, were reviewed in order to develop BLM management direction for GRSG under Alternative C (Draft EIS, page 39).

Alternative D incorporates adjustments to the NTT report (NTT 2011) to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses, and was developed in full cooperation with the Cooperating Agencies taking note of the agencies' concerns with socioeconomic issues. Section 2.6, Alternatives Considered but not Analyzed in Detail, of the Draft EIS, the Garfield County Alternative was analyzed but not considered in detail in the DEIS primarily because it is contained within the existing range of alternatives (page 41). However, the BLM included the alternative as an appendix and requested public comment on it. Based on the public input, the BLM would analyze the alternative and the public comments, then make the determination if it would be part of the Proposed Action in the FEIS. [NOTE TO BLM: will need to add the conclusory statement here regarding whether you accepted it into the FEIS/Proposed RMPA.]

While the State of Colorado did not submit a complete alternative or elements to be considered as part of another alternative, the BLM considered the Colorado Department of Natural Resources' Colorado Greater Sage-Grouse Conservation Plan: The Colorado Package (DEIS Appendix N) in its cumulative effects analysis (Draft EIS Chapter 5, Cumulative Effects, Section 5.4, Special Status Species – Greater Sage-Grouse, page 944).

~~In determining the disturbance cap level for each alternative, the BLM utilized the recommendations and input specific to each alternative. For example, for Alternative B, the BLM utilized the cap levels recommended in the NTT Report. Conservation measures included in Alternative B focus primarily on GRSG PPH and include a 3-percent disturbance cap in PPH. PPH areas have the highest conservation value to maintaining or increasing GRSG populations.~~

~~For Alternative C, conservation measures were mostly focused on ADH (PPH, PGH, and linkage/connectivity habitat). These areas have been identified by CPW in coordination with respective BLM offices, and include a 3-percent cap on disturbance in ADH. This disturbance cap number for Alternatives B and C were incorporated as is from the NTT Report and conservation group alternatives; the BLM did not modify the caps in the alternatives.~~

~~For Alternative D, the BLM intended to protect those areas that were most important for sage grouse within PPH; in other words, the alternative would protect the best of the best habitat. The BLM utilized information from the Wyoming Core Strategy to support consideration of the five-percent disturbance cap, with the goal to represent the reasonable edge of the range of alternatives with a higher percentage.~~

~~While the caps would set a particular level of disturbance, the implementation of the disturbance caps would occur after the RMPA is approved in the Record of Decision. The BLM inventoried the habitat with the best available info at the time of the~~

I. CEQ regulations direct that an EIS "...shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). Also, under the CEQ regulations, the BLM is required to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources as provided by section 102(2)(E) of the Act [NEPA]." (40 CFR 1501.2(c)). The breadth or narrowness of the purpose and need statement has a substantial influence on the scope of the subsequent analysis. The purpose and need statement provides a framework for issue identification and will inform the rationale for alternative selection. The range of alternatives developed are intended to meet the purpose and need and address the issue; thereby, providing a basis for eventual selection of an alternative in a decision (BLM NEPA handbook).

An agency's refusal to consider proposed alternatives does not mean that an alternatives analysis is deficient, as long as the agency provides an explanation for why the proposed alternative was not considered in depth. See *Western Watershed Projects et al vs. BLM* (No. 2:10-CV-02896-KJM-KJN), and *Earth Island Inst.*, 697 F.3d at 1022–23.

As stated in the DRMPA/EIS, the BLM is preparing RMP amendments with associated EISs for RMPs applied to lands with GRS habitat. This effort responds to the USFWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms in BLM land use plans was inadequate to protect the species and its habitat. The plan amendments will focus on areas affected by threats to GRS habitat identified by the USFWS in the March 2010 listing decision. The primary threat to sagebrush habitat in MZ I and specifically within the Yellowstone Watershed population as identified in the COT report is conversion of sagebrush to agricultural lands or other land uses. Infrastructure from energy development also represents a threat. To address the threats, BLM is considering a range of changes in management of GRS habitats to avoid the continued decline of populations and habitats across BLM-administered lands. This purpose and need provides the appropriate scope to allow the BLM to analyze a reasonable number of alternatives to cover the full spectrum of potential impacts.

A monitoring framework was developed by a Disturbance and Monitoring Team that focuses on the implementation and

The BLM considered a reasonable range of alternatives during the GRSG planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and GRSG in the planning area, the BLM fully considered the management opportunities presented in the 1988 North Dakota RMP and record of decision (ROD), and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As described in Section 2.2 of the DEIS, the range of alternatives was developed that meet the purpose and need of the North Dakota Greater Sage-Grouse DRMPA/DEIS – “to identify and incorporate appropriate conservation measures to conserve, enhance and/or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat”. As a result, four alternatives were analyzed in detail in the North Dakota Greater Sage-Grouse DRMPA/DEIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DRMPA/DEIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

The BLM did consider less restrictive management actions for fluid mineral leasing (see Table 2-3 of the DRMPA/DEIS, page 2-33). Under Alternative A, the NSO within 0.25 mile of active GRSG strutting ground is less restrictive than the NSO within all PH under Alternative D, or no leasing under Alternative C. Alternative B did not apply any NSO or CSU restrictions in GH but would apply minimization of surface-disturbing or disrupting activities (including operations and maintenance) where needed to reduce the impacts of human activities on important seasonal GRSG habitats. These requirements are less restrictive than applying a CSU in GH under Alternative D, or no leasing under Alternative C.

The FLPMA makes it clear that the term “multiple use” means that the Secretary can make the most judicious use of the land for some or all of the resource uses. Therefore, the BLM has the discretion to make decisions that satisfy a range of needs. The term is defined in the FLPMA (Section 103(c)) as “the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people.” Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM’s multiple use mandate does not require that all uses be allowed on all areas of the public

NOTE TO ALL Project

Teams:

The issue statements related to the disturbance cap should be moved out into their own section, not lumped under NEPA range of alternatives. While the issue/response is noted here as deletion, it is copied into the Disturbance tab of the workbook.















distinguish between how the  
alts include everything that  
needed to be considered (the  
range) vs. what was decided to  
go forward in the proposed  
plan.

Proposed plan rationale  
discussed in Section XX of the  
FEIS. (BLM/FS teams will  
decide on the rationale for the  
Proposed Plan)

Plan	Issue Statement
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OR	<p>Commenters stated that the EIS fails to meet NEPA adequacy for baseline data because the scale of baseline data used is too broad and has not been ground-truthed. Commenters also recommended additional sources of data that should be considered/reconciled with current data and questioned if the best available data was used.</p>
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UT The BLM and the Forest Service did not provide sufficient affected environment information to meet NEPA requirements and failed to include local and site-specific information.

ID-SW MT The EIS fails to meet NEPA adequacy for baseline data because the scale of baseline data used is too broad, the EIS failed to include the State and Transition models as part of the baseline information, and the No Action management actions, as presented, do not explain the regulatory mechanisms that are currently available to preserve sage grouse habitat.

NV-CA Issue 1: Commenters expressed concern about lack of site-specific data, especially from local sources, including ranchers. Commenters stated science and methodology relied upon by the agencies in completing the DEIS is flawed and incomplete. The agencies' heavy reliance on the incomplete ESDs and the inadequate disclosure that the relevant variables were incomplete falls well short of NEPA's requirements.

Issue 2: Commenters stated the No Action Alternative is incorrect. The Agencies have artificially deflated the No Action Alternative.

Issue 3: Commenters stated the PPG and PGH maps are inaccurate. The BLM does not provide a quantitative definition of PPH. BLM's current definition of PPH is not only vague and inconsistent but also overly broad. PPH and PGH maps should be amended in the RMPs based on site-specific data

Issue 4: Commenters stated the EIS does not properly address the benefits of livestock grazing in relation to greater sage-grouse habitat conservation.

NWCO n/a

Lewisto BLM must clearly state in the FEIS what  
wn information is not available for the analysis per NEPA regulations, 43 CFR 1502.22(b).



ND The BLM needs to consider new information related to sage-grouse and sagebrush steppe that was published during preparation of the DRMPA/DEIS (see specific referenced materials in comment above).

WY9

## Response

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Oregon GRSG RMPA/EIS is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in Chapter 3 and various appendices including Appendices I, K, L, and N in the Oregon GRSG RMPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the RMPA/EIS.

Programmatic documents are regional in scope and place emphasis on developing broad environmental policies, programs, or plans. Site-specific data is important during implementation level decisions, which may be tiered to the decisions made in this document. Data scales include broad-scale, mid-scale, fine-scale, and site-scale. For this planning document, it is appropriate to utilize data at the mid-scale (e.g., WAFWA management zones) and fine-scale (e.g., sub-region data). For this document, the best available information was used as generated and provided by the organizations and agencies with authority and special expertise to provide that information on a planning scale.

The RMPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM would conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental descriptions would be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions.

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Utah Greater Sage-Grouse LUPA is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM and the Forest Service complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in Chapter 3 and various appendices in the Utah Greater Sage-Grouse LUPA, including Appendices A, N, O, P, and Q, is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS. For example, listing every water quality-impaired stream within the planning area by name would not provide useful information at this broad-scale analysis, particularly where the proposed plan alternatives did not vary the level of riparian protections to provide reduced levels for non-impaired streams. The riparian protections within each alternative were applied to all streams, whether or not they were water quality-impaired. However, understanding the miles of impaired BLM streams, as presented in the DLUPA/EIS at Section 3.6.1, is useful in establishing a baseline by which the BLM may analyze the relative effects of each alternative's broad-based approach.

Since this is a programmatic effort, county-by-county or planning-by-planning area level of detail is not consistent with the level of detail required for a programmatic analysis. Programmatic documents are regional in scope and place emphasis on developing broad environmental policies, programs, or plans. Site-specific data is important during implementation level decisions, which may be tiered to the decisions made in this document. Data scales include broad-scale, mid-scale, fine-scale, and site-scale. For this planning document, we are staying at the mid-scale (e.g., WAFWA management zones) and fine-scale (e.g., sub-region data). For this document, the best available information was used as generated and provided by the organizations and agencies with authority and special expertise to provide that information on a planning scale.

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the [name of particular amendment] is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM and the Forest Service complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in [Chapter XX] and various appendices including [cite appendix(ces)] in the [name of particular amendment] is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS. **For example, see specific examples under sections XX.XX, XX.XX, and XX.XX of this report.** ~~[use relevant example for the particular issue...here's one provided: listing every water quality impaired stream within the planning area by name would not provide useful information at this broad-scale analysis, particularly where the proposed plan alternatives did not vary the level of riparian protections to provide reduced levels for non-impaired streams. The riparian protections within each alternative were applied to all streams, whether or not they were water quality impaired. However, understanding the miles of impaired BLM streams, as presented in the DLUPA/EIS at Section 3.5.7, is useful in establishing a baseline by which the BLM may analyze the relative effects of each alternative's broad-based approach.]~~

As specific actions come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental

Response 1: The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, this EIS is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM and the Forest Service complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed action. The affected environment provided in Chapter 3 and various appendices in this EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS.

As specific actions come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions.

Response 2: The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

n/a

[NOTE TO BLM: this may result in a change to the FEIS in clarification of the information that is/is not available for inclusion. May only need to be a few sentences/one paragraph to clarify the NEPA requirements. If you make the clarification, then include this in the response:]

Before beginning the Lewistown Field Office Greater Sage-Grouse RMPA/EIS and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The RMPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning. However, the BLM recognizes that there are data that are unknown or prohibitively expensive to obtain. Per NEPA regulations at 40 CFR 1502.22, the FEIS has been updated to include information and examples of data that were unavailable

[NOTE TO BLM: These referenced materials need to be reviewed for relevance and whether the information is new. Determine whether the information is already covered in the EIS (although specific reference is to another document), or if the new references change the conclusions of the analysis.]

BLM teams have reviewed the suggested reports/data/articles to determine if they are substantially different than the information cited in the North Dakota Greater Sage-Grouse DRMPA/DEIS. The commenters' additional information was found to provide the [NOTE TO BLM: same/similar information/results/findings] as already noted in the DRMPA/DEIS, therefore inclusion and consideration would not substantially alter the conclusions or analysis. Therefore, they were not incorporated into the FEIS. [NOTE TO BLM: Could expand on the response with specifics of how the information was similar and where it could be found in the EIS.]

NOTE TO BLM: If the report presented different/newer information that reviewer believes should be included in the FEIS, then the response would be: BLM teams have reviewed the suggested reports/data/articles to determine if they are substantially different than the information cited in the North Dakota Greater Sage-Grouse DRMPA/DEIS. The commenters' additional information was found to provide new/updated information that has been incorporated into the FEIS (see Section

NOTE TO ALL

SUBREGIONAL TEAMS:

The OR intro text is very good for setting the stage as to what the requirements are for adequate baseline information/affected environment. Suggest using this intro language in the tab related to general NEPA/Baseline information, but further suggest to move anything specific, such as issues/responses related to sagebrush vegetation baseline information, to the appropriate subtopic issue/response (e.g., sagebrush veg = tab 26)

As noted in the general notes as well as under individual topic baseline sections, this will provide the necessary NEPA standard explanation







Issue/Response #4 - there's a disconnect between the issue & response. Issue notes that there wasn't enough/any impact analysis on the benefits of livestock grazing, yet the response speaks to range of alternatives. Suggest resolving the conflict and moving to the appropriate subsection in livestock grazing (whether alternatives or impact analysis, 16.1 or 16.4)

Issue/Response #5: suggest moving to minerals (leasables?) section.

Plan	Issue Statement
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OR	Commenters noted several issues with the GIS data and analysis conducted in the Draft EIS, including that the maps and data layers do not provide enough detail or are too coarse in scale, do not provide assurances to more localized decision making, some habitat type areas are inaccurately identified in the maps, and some important data is missing or needs to be updated.
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UT The BLM and Forest Service has failed to take the “hard look” required by NEPA because it failed to use adequate baseline data for its analysis. Commenters noted several issues with the GIS data and analysis conducted in the Draft EIS:

- The maps and data layers do not provide enough detail to address "local ecological site variability". The data are too coarse and do not provide assurances to more localized decision making; some habitat type areas are inaccurately identified in the maps.

- BLM and Forest Service used old data layers to develop maps, including PPMA, PGMA, and population area boundaries; BLM and Forest Service should use the newer data layers that local and state agencies developed.

- The agencies must provide a mechanism to ground-truth the proposed PPMA and PGMA habitats on a project-specific basis in order to effectively assess the potential impacts of management decisions.

ID-SW  
MT Commenters noted several issues with the GIS data and analysis conducted in the Draft EIS:

- The maps and data layers do not provide enough detail to address "local ecological site variability". The data are too coarse and do not provide assurances to more localized decision making; some habitat type areas are inaccurately identified in the maps.
- BLM used old data layers to develop maps; BLM should use the newer data layers.

--the BLM needs to be consistent in their edge-mapping across state boundaries when there are different data sets used.

NOTE TO BLM: some comments relate to specific changes for the maps presented in the DEIS, and for the data layers to be made available for download from the BLM website.

NV-CA Issue 1: Commenters requested project level maps and project level mitigation.

Issue 2: Commenters questioned the delineation of the planning area boundary, in particular for Esmeralda County.

NWCO Commenters noted several issues with the GIS data and analysis conducted in the Draft EIS:

- The maps and data layers do not provide enough detail to address "local ecological site variability". The data are too coarse and do not provide assurances to more localized decision making; some habitat type areas are inaccurately identified in the maps.
- BLM used old data layers to develop maps; BLM should use the newer data layers that CPW produced.
- BLM should consider additional variables in the CPW data model to better represent the PPH and PGH areas.

Lewisto Commenters requested clarification as to why there were changes to breeding bird density mapping done by the state; [how the Final RMPA/EIS will address Executive Order No. 2-2013](#); and the RMPA/EIS needs to explain how the final planning document will correspond with the state of Montana GRSG [population management objectives](#)

ND BLM needs to explain the science and rationale behind development of the PH and GH boundaries presented in the DRMPA/DEIS.

WY9

## Response

As noted in Section 4.4, Baseline information, of this report, before beginning the Oregon RMPA/DEIS and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. Additionally, the BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Oregon Department of Fish and Wildlife. Considerations included but were not limited to [NOTE: Contact GIS lead, Jeanne, for types of data or GIS layers that were gathered/used. A few examples: threatened and endangered species and their habitats, water quality- limited (303d) streams, deer and elk herd management areas, invasive plants, and uses on State lands]. For GRSG habitat data, the ODFW is periodically collecting and refining population and habitat data for the species, and the Draft EIS notes that the BLM would incorporate any refinements or updates once the data was made available. However, it is not the responsibility of the BLM to modify, change, update, or revise the specific modeling protocol and analysis developed by other agencies or groups.

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13). The BLM will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.~~

As described above, the RMPA/EIS data and information presented in map and table form is of the appropriate scale and is sufficient to support the broad scale analyses required for land use planning.

In the Final EIS, the management allocations (PPMA and PGMA) will be clipped to BLM-managed lands to provide additional clarification that land use decisions for the RMPA/EIS will only apply to BLM-managed lands, and will not be applied to private, local, or state owned lands.

GIS data for the Oregon RMPA/DEIS was made available to the public when the Draft EIS was published and can be found on



Before beginning the Utah Greater Sage-Grouse LUPA/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, the UT Division on Wildlife Resources, and the Public Lands Policy Coordination Office within the Governor's Office. Considerations sage grouse related data layers, including occupied habitat, sage grouse management areas, and lek data. The UT DWR is continually collecting and refining population and habitat data for species, and the Draft EIS notes that the BLM and Forest Service would incorporate any refinements or updates once the data was made available.

As a result of these actions, the data gathered by the BLM and the Forest Service is of the appropriate scale and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives.

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at H-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM and the Forest Service will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.~~

Commenters noted that in the discussion of the data from the Baseline Environmental Report (BER), "...some local data may have been omitted." (DEIS, Section 3.1). Since the BER report covers many states across the western United States, broad-scale national data were deemed to be the most consistent data available. As such, data that may also be collected at a state-

Before beginning the Idaho Sage grouse EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and [list state agencies, including state wildlife agency]. Considerations included but were not limited to [list the types of data or GIS layers that were gathered/used. A few examples: threatened and endangered species and their habitats, water quality- limited (303d) streams, deer and elk herd management areas, invasive plants, and uses on State lands]. It is not the responsibility of the BLM or FS to modify, change, update, or revise the specific modeling protocol and analysis developed by other agencies or groups. The Draft EIS notes that the BLM and FS would incorporate any refinements or updates if or when the data were made available. [NOTE TO BLM: If and updates or new layers have become available, can note them here.]

As a result of these actions, the data gathered by the BLM and the Forest Service is of the appropriate scale and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives.

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H 1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM and the Forest Service will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.~~

Response 1: As the decisions under consideration by the BLM and the Forest Service are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

Response 2: The planning area is the geographic area within which the BLM will make decisions during a planning effort. A planning area boundary includes all lands regardless of jurisdiction; however the BLM will only make decisions on lands that fall under the BLM's jurisdiction (including subsurface minerals). Unless the State Director determines otherwise, the planning area for a RMP is the geographic area associated with a particular field office (43 CFR 1610.1(b)). State Directors may also establish regional planning areas that encompass several field offices and/or states, as necessary.

For this environmental impact statement, decision areas are those public lands and mineral estates within the planning area that are encompassed by all designated habitat (ADH) (which includes preliminary priority habitat [PPH], preliminary general habitat [PGH], and linkage/connectivity habitat).

Before beginning the Northwest Colorado Sage grouse EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, Colorado Parks and Wildlife (CPW), Office of Surface Mining, Colorado State Land Board, US Dept. of Energy. Considerations included but were not limited to Greater sage-grouse habitat delineated by CPW, threatened and endangered species habitats, deer and elk herd management areas, fluid mineral development areas, solid mineral development areas, mineral potential areas, etc.. It is not the responsibility of the BLM or FS to modify, change, update, or revise the specific modeling protocol and analysis developed by CPW. The CPW is continually collecting and refining population and habitat data for species, and the Draft EIS notes that the BLM and FS would incorporate any refinements or updates once the data was made available by CPW. To date, CPW has neither published nor provided the newer data for use for the FEIS. [NOTE TO BLM: If they do, then state that BLM will incorporate the revised data into the document or analysis.]

As a result of these actions, the data gathered by the BLM and the Forest Service is of the appropriate scale and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives.

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H 1601 I, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 — Land Management Planning). The BLM and the Forest Service will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, site specific analysis of land use authorizations, lease sales, etc. The subsequent NEPA analyses for project specific actions will tier to the land use~~

[NOTE TO BLM: provide a response regarding clarification of breeding bird density mapping and note if PPH layer is updated]

[NOTE TO BLM: provide insert response from SO regarding Executive Order No. 2-2013 inclusion in the FEIS]

The habitat delineations in the North Dakota Greater Sage-Grouse DRMPA/DEIS were created by the BLM and NDGFD, who is responsible for managing and monitoring GRSG populations. Based on the Baseline Environmental Report (Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse [*Centrocercus urophasianus*]) and other recent, published, and peer-reviewed scientific data, and in cooperation with the NDGFD, the BLM created the Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH) areas. The descriptions below are how sage-grouse habitat was mapped to delineate PPH and PGH in the North Dakota Greater Sage-Grouse DRMPA/DEIS.

#### Preliminary Priority Habitat

GRSG leks were buffered by 5.3 miles to map PPH. A 4-mile buffer would include approximately 80 percent of nesting GRSG hens; therefore, the 5.3 mile buffer was used in order to capture 100 percent of the nesting hens, and consequently, almost all the habitat for sage-grouse (a small amount of habitat was left on the southeast corner but no birds nearby). Buffering leks produced "bubbles" of PPH, and these boundaries were "softened" to form the northern and eastern edge of PPH. The western and southern boundaries are the states of Montana and South Dakota respectively.

#### Preliminary General Habitat

The PGH for North Dakota is what remained for habitat on the eastern portion of the bird's range; this is the historic range for GRSG. There are no GRSG leks in the PGH area, but birds occasionally use it.

1 Doherty, K. E., D. E. Naugle, H. E. Copeland, A. Pocewicz, and J. M. Kiesecker. 2011. Energy development and conservation tradeoffs: systematic planning for Greater Sage-Grouse in their eastern range. Pp. 505–516 in S. T. Knick and J. W. Connelly (editors). *Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats*. Studies in Avian Biology (vol. 38), University of California Press, Berkeley, CA.

2 Michael A. Schroeder, Cameron L. Aldridge, Anthony D. Apa, Joseph R. Bohne, Clait E. Braun, S. 2 Dwight Bunnell, John W. Connelly, Pat A. Deibert, Scott C. Gardner, Mark A. Hilliard, Gerald D. Kobriger, Susan M. McAdam, Clinton W. McCarthy, John I. McCarthy, Dean L. Mitchell, Eric V. Rickerson, and San I. Stiver. DISTRIBUTION OF SAGE-GROUSE IN

**NOTE TO****SUBREGIONAL TEAMS:**

Suggest streamlining the responses based on current text in the more general NEPA baseline and impact analysis sections (4.4 & 4.6). Delete redundant information, insert cross reference. Suggest keeping the responses specific to the GIS questions.





NOTE TO BLM: this response is not the most current version. Will update it to use in the RM region.

develop responses. Blue text appears to speak more specifically to other topics and the link to GIS is not clear. Suggest moving the issues or further clarification of the GIS connection.



Plan	Issue Statement
OR	n/a
UT	Indirect impacts discussed in the EIS are inadequate because the environmental consequences of the no action alternative compared with the other alternatives do not differentiate between actual impacts and theoretical impacts.

ID-SW	BLM's overall impact analysis is deficient in the following areas:
MT	<ol style="list-style-type: none"> <li>1. lack of discussion for where, when, and how BLM will have sufficient funding to implement the actions;</li> <li>2. the analysis does not distinguish between the effects of each alternative;</li> <li>3. did not fully analyze the No Action alternative by not acknowledging the existing laws and actions already in place that would</li> </ol>

NV-CA Issue 1: Commenters requested project level impacts, especially regarding mitigation costs.

Issue 2: Commenters stated the No Action Alternative is incorrect. The Agencies have artificially deflated the No Action Alternative.

Issue 3: Commenters questioned why current regulatory mechanisms are inadequate.

NWCO The BLM has not considered the direct, indirect and cumulative impacts of the proposed action on the Grand River Health District.

Lewisto    The DEIS fails to identify reasonably  
wn            foreseeable future actions in the cumulative  
               effects analysis.

ND        n/a  
WY9

## Response

n/a

Chapter 4 presents the impacts anticipated from the various alternatives based on best available science and professional judgment. Effects from the current management situation are described in Chapter 3, Affected Environment, and projected impacts from each alternative are identified in Chapter 4.

As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the no action alternative, any adverse environmental effects that cannot be avoided should the alternatives be implemented (e.g., impacts from existing infrastructure), the relationship between short-term uses of the built environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Because land use plan-level decisions are typically broad and qualitative rather than quantitative or focused on site-specific

1. As a landscape level planning effort, none of the alternatives prescribe project-level or site-specific activities on BLM or USFS managed lands. Furthermore, the agencies' selection of an alternative does not authorize funding to any specific project or activity nor does it directly tie into the agencies' budgets as appropriated annually through the Federal budget process. As a consequence, agencies' costs and differences in program costs across alternatives have not been quantified. Information has been presented in several resource impact sections on the types of costs that might be associated with various sage-grouse conservation measures. [NOTE TO BLM- above language from Josh Sidon, Lauren may want to use across all subregions.]
2. Direct the reader to the Effects Summary table in ch 2. Determine whether revisions to the table would be necessary to distinguish more between the effects.
3. Check for the No Action alternative to see if there already is a statement for how existing management/actions would impact the habitat. This may be to direct the reader to a specific section in Ch 4 or several sections.

Response 1: As the decisions under consideration by the BLM and the Forest Service are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse.

Response 2: The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A).

Response 3: As stated in the DLUPA/EIS, the BLM and the Forest Service are preparing LUP amendments with associated EISs for LUPs applied to lands with greater sage-grouse habitat. This effort responds to the FWS's March 2010 'warranted, but precluded' Endangered Species Act listing petition decision, and that existing regulatory mechanisms (I suggest adding a statement to plainly state something like "Sage-grouse populations are currently declining, showing that current regulatory mechanism are inadequate." I think we should state it in plain language so the public understands. (Harber)) in BLM and the Forest Service land use plans was inadequate to protect the species and its habitat. The plan amendments will focus on areas affected by threats to greater sage-grouse habitat identified by the FWS in the March 2010 listing decision. The two primary threats to sagebrush habitat are infrastructure from energy development in the eastern portion of the species' range and conversion of sagebrush habitat to annual grasslands due to wildfires in the western portion of the species' range. To address the threats, BLM and Forest Service are considering a range of changes in management of greater sage-grouse habitats to avoid the continued decline of populations and habitats across BLM- and Forest Service-administered lands. This purpose and

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA

The BLM thoroughly explained its consideration and analysis of cumulative effects in the DRMPA/EIS in Section 5.1. The DRMPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future action.

Based on the existing protest resolution related to oil and gas leasing and the standard lease stipulations (Appendix J) that can be applied to leases, the Lewistown Field Office cannot separate management strategies by PH and GH at this time. A RFD is currently being developed in conjunction with the RMP revision that process that the Lewistown Field Office initiated in February 2014. This RMP revision will include an oil and gas leasing decision and a comprehensive list of lease stipulations.

The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

The DRMPA/EIS contains a qualitative discussion of cumulative effects at the WAFWA Management Zone scale to set the stage for a more quantitative analysis to be contained in the Proposed RMPA/FEIS.

n/a

Under general notes, see the response related to issue #1. Insert here.

Also suggest including intro general NEPA requirements language for what is requisite level of analysis and what needs to be included in the analysis.

Issue 3 sounds like a P/N issue.  
Suggest moving it to 4.3  
section.

NOTE TO SUBREGIONAL  
TEAMS: this provides good  
intro general NEPA  
requirements language.  
Consider it for your 4.6  
sections.



Plan Issue Statement

OR The EIS cumulative impacts analysis is inadequate because it does not adequately identify the reasonably foreseeable future actions, present a comprehensive listing of the effects across all sub-regions, provide sufficient analysis of primary threats to GRSG, nor analyze how the alternatives' actions would affect actions and decisions in adjacent private lands as well as neighboring states.

UT The BLM and Forest Service need to consider the cumulative effects of the adjoining subregional Sage-grouse planning efforts and the other actions occurring on state and private lands in the Final EIS, including reasonably foreseeable future actions on private lands, which were omitted from the DEIS.

ID-SW The EIS cumulative impacts analysis is  
MT inadequate because it does not adequately identify the reasonably foreseeable future actions, present a comprehensive listing of the effects across ALL subregions, nor analyze how the alternatives' actions would affect actions and decisions in neighbouring states/jurisdictions  
NV-CA The DEIS does not adequately analyze cumulative effects from past, present, and reasonably foreseeable future actions.

NWCO The BLM failed to disclose the impacts  
resulting from the sage grouse being listed.

Lewisto n/a  
wn  
ND n/a  
WY9

## Response

[Note to BLM: Can direct reader to cumulative impacts; note that the cum impacts are updated based on work done between Draft & Final; see if there is anything specific you can add to clarify how actions in neighboring jurisdictions/states were addressed in the cum. Regional call on whether to roll up effects totals into a region wide estimate as suggested by commenter. ]

The BLM thoroughly explained its consideration and analysis of cumulative effects in the RMPA/EIS in Section 5. The RMPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

The RMPA/EIS contains a qualitative discussion of cumulative effects at the WAFWA Management Zone scale to set the stage for a more quantitative analysis to be contained in the Proposed Land Use Plan Amendment/FEIS. Additional quantitative cumulative analysis was added to the Final EIS in Section 4.24 [Note To BLM: Waiting for analyses from national team.

The BLM and the Forest Service thoroughly explained its consideration and analysis of cumulative effects in the DLUPA/EIS in Section 4.24. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective.

The BLM and the Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

The DLUPA/EIS contains a qualitative discussion of cumulative effects at the WAFWA Management Zone scale to set the stage for a more quantitative analysis to be contained in the Proposed Land Use Plan Amendment/FEIS. Additional quantitative cumulative analysis was added to the Final EIS in Section 4.24, Cumulative Impacts. [NOTE TO BLM: waiting for analyses from national team. EMPSi will include more details as they become available.] Per 40 CFR 1503, the BLM and Forest Service provided cooperating agencies the opportunity Can direct reader to cumulative impacts; note that the cums impacts are updated based on work done between Draft & Final; see if there is anything specific you can add to clarify how actions in neighbouring jurisdictions/states were addressed in the cums. Regional call on whether to roll up effects totals into a region wide estimate as suggested by commenter.

To be discussed by Joe, Randy Arlene & Lauren.

Analyzing the impacts as a result of assuming that the Greater Sage-grouse may become listed under the ESA is outside the scope; the purpose and need of this plan amendment is to address inadequacy of regulatory mechanisms that were identified as one of the listing factors for GRSG in the USFWS finding on the petition to list GRSG. The USFWS identified the principal regulatory mechanism for the BLM and Forest Service as conservation measures in LUPs. In response to the USFWS findings, as well as the BLM and Forest Service's requirement to manage sensitive species, the BLM and Forest Service are preparing plan amendments with associated EISs to evaluate the incorporation of conservation measures in LUPs for GRSG. Because the purpose of the LUP amendments is to identify and potentially incorporate appropriate conservation measures in LUPs to conserve, enhance and/or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat, the alternatives in this EIS, therefore, focus on those conservation measures that can be incorporated into the LUPs. Although the potential listing of GRSG would also include conservation measures identified by the USFWS, those conservation measures are not known at this time. Therefore, analysis of

n/a

n/a

Not clear the connection of response re: CCAs  
and CCAAs to issue statement.

See other subregions general intro language for NEPA cums effects analysis requirements; suggest adding it here.

See other subregions general intro language for NEPA cums effects analysis requirements; suggest adding it here.



See other subregions general intro language for NEPA cums effects analysis requirements; suggest adding it here.

Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO	n/a
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Lewistow	n/a
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ND	n/a
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WY9

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	<p>The BLM needs to include a monitoring, mitigation, and adaptive management plan/framework in the FEIS that will include specific criteria for determining sage grouse conservation success. The BLM should utilize intra and interstate coordination in the development of the mitigation plan and monitoring framework and provide a description of how these plans will coordinate with the State mitigation plan.</p>

UT 1. BLM and Forest Service needs to release the Monitoring Strategy for public comment and produce a Supplemental EIS to address this change.

2. BLM needs to clarify the relationship between the disturbance thresholds and the monitoring framework.

[NOTE TO EMPSI: Change the section title to Monitoring and Mitigation Measures in all future versions.]

ID-SW  
MT

1. The BLM needs to include a monitoring, mitigation, and adaptive management plan/framework in the FEIS that will include specific criteria for determining sage grouse conservation success and how the disturbance percentages will be calculated.
2. BLM needs to clarify the relationship between the disturbance thresholds and the monitoring framework.
3. The BLM needs to release the mitigation strategy for public review.

NV-CA

1. The BLM needs to include a monitoring, mitigation, and adaptive management plan/framework in the FEIS that will include specific criteria for determining sage grouse conservation success and how the disturbance percentages will be calculated.
2. The BLM needs to define when mitigation would be used and have enough specificity in the mitigation and monitoring plans to implement them in development actions.

NWCO The BLM needs to include a monitoring, mitigation, and adaptive management plan/framework in the FEIS that will include specific criteria for determining sage grouse conservation success and how the disturbance percentages will be calculated. BLM needs to define when mitigation would be used and have enough specificity in the mitigation and monitoring plans to implement them in development actions.

Lewisto Commenters provided additional mitigation  
wn measure to be considered in the FEIS. Commenters also requested the Final RMPA/EIS clarify what type of development the RDFs/mitigation measures in Appendix B and C apply to. Also, the Final RMPA/EIS should provide measurable objectives for mitigation, including "triggers" and measures of success.



ND The final monitoring report was not available for the public to comment on in the DRMPA/DEIS, and the habitat suitability assessment should be clarified. The FEIS needs to clarify how collaboration across jurisdictional boundaries will occur when implementing conservation measures.

WY9

## Response

The BLM complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the RMPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. The BLM must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM has full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate. The BLM is also under instruction to follow the Draft Regional Mitigation Manual (Draft MS-1794) as the interim policy until the manual is finalized.

A monitoring framework was developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by sub-region area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013).

To accomplish effective monitoring, the BLM will analyze the quantitative and qualitative monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. , [Note to BLM: Check this language after Appendix G is finished by the national team.] When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

[NOTE TO BLM: The national team is creating language for off-site mitigation and bond requirements. EMPSi will update this response as necessary when that language is available.]

1. While not required by the NEPA, monitoring can be implemented to determine if the decisions are achieving intended environmental objectives, and whether predicted environmental effects were accurate (BLM Handbook H-1601, Land Use Planning Handbook). In a ROD, a monitoring and enforcement program shall be adopted and summarized where applicable for any mitigation (40 CFR 1505.2(c)). Per CEQ 40 questions, 34c, a mitigation and monitoring program has been addressed in the DLUPA/DEIS. A more detailed discussion has been included in the Proposed LUPA/Final EIS as we move towards the required language in the Record of Decision.

2. The BLM and Forest Service revised the monitoring framework and mitigation strategy that are included in the Proposed LUPA/Final EIS as Appendices E and F. The appendices describe the process that the BLM will use to monitor implementation and effectiveness of RMP decisions. The monitoring framework includes monitoring at various scales specific to GRSG habitat, consistent indicators to measure and metric descriptions for each of the scales, analysis and reporting methods, and the incorporation of monitoring results into adaptive management. The need for fine and site-scale specific habitat monitoring will vary by area depending on existing conditions, habitat variability, threats, and land health. To accomplish effectiveness monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes. The BLM and Forest

The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain actions [or not taking action, depending on position of issue statement], such as [cite to any specific examples included with comments], is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.

[Cite specifics relevant to the sub-regional for where the alternatives have incorporated mitigation measures designed to avoid or reduce impacts within the management actions and supporting information in the appendices. If there are many, then note that the impacts presented in Chapter 4, therefore, are considered unavoidable and would result from implementing the management actions and mitigations. Cite a few examples of the actions that include specific mitigation measures as part of the alternative(s). Sample: “Action BIO-1: Implement the standard operating procedures (SOPs) contained in Appendix O (Biological Standard Operating Procedures) and Appendix P (Standard Operating Procedures for Oil and Gas) for all project work would help to mitigate effects as a result of oil and gas activities on biological resources.”]

A monitoring framework was developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven Mitigation, adaptive management and a monitoring framework were developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013). [If needed, based on specifics of comments and/or summary statement, include statement to the effect that broad- and mid-scale monitoring will be conducted as funding allows.] (To be discussed by Joe, Randy Arlene & Lauren.)

[Refer to the Monitoring Framework in the appendix.] To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag

DEIS Appendix G, Surface Reclamation Plan, refers to the White River Field Office because it originated in that field office. The plan would be adopted for the Northwest Colorado Greater Sage-Grouse Land Use Plan Amendments, as specified in DEIS Chapter 2, Alternatives. We have updated the appendix to make it more specific to the Northwest District and the Colorado Greater Sage-Grouse LUP Amendment.

Mitigation, adaptive management and a monitoring framework were developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be "rolled up" for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013).

*[Refer to the Monitoring Framework in the appendix.]* To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife *[NOTE TO BLM: need direction for this response based on the national monitoring framework being developed by the National team. The national monitoring response is presented below which can be supplemented with information regarding the other two issues.]*

A monitoring framework was developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be "rolled up" for reporting monitoring results across the range of GRSG, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by RMP area; by the seven (WAFWA) GRSG Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the GRSG Conservation Objectives Team (COT) Report (USFWS 2013). *[If needed, based on specifics of comments and/or summary statement, include statement to the effect that broad- and mid-scale monitoring will be conducted as funding allows.]*

*[Refer to the Monitoring Framework in the appendix in FEIS.]* To accomplish effective monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

Or could use this paragraph:

The BLM has drafted a monitoring framework that is included in the Proposed RMPA/FEIS as Appendix X. The appendix describes the process that the BLM will use to monitor implementation and effectiveness of RMP decisions. The monitoring framework includes monitoring at various scales specific to GRSG habitat, consistent indicators to measure and metric descriptions for each of the scales, analysis and reporting methods, and the incorporation of monitoring results into adaptive

NOTE: This is language from the National Response Team. Need to work on this response once the final framework is completed. Need to come up with a response to "The final monitoring report was not available for the public to comment".

A monitoring framework was developed for the North Dakota Greater Sage-Grouse DRMPA/DEIS by a Disturbance and Monitoring Team. The framework focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM worked with Western Association of Fish and Wildlife Agencies (WAFWA) to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be "rolled up" for reporting monitoring results across the range of GRSG, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by RMP area; by the seven (WAFWA) GRSG Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the GRSG Conservation Objectives Team (COT) Report (USFWS 2013). The monitoring framework is not based on the COT Report, but rather follows guidelines established by multiple agencies in the Sage-grouse Habitat Assessment Framework (HAF; Stiver et al. 2010). This approach uses the four orders of GRSG habitat selection (Johnson 1980): first order (broad scale), second order (mid-scale), third order (fine scale), and fourth order (site scale). Habitat suitability assessments are not done as part of this planning process.

[NOTE TO BLM: Refer to the Monitoring Framework in the appendix in FEIS.] To accomplish effective monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

**NOTE TO****SUBREGIONAL TEAMS:**

See Mitigation, Monitoring, and Adaptive Management tabs for national response language.

These issue statements/responses are very similar to those presented under the SG tab (7.9). Suggest reviewing both together and determine if they are the same and can be combined, or if there are specific differences that should be split out.

For example, perhaps this tab should be used to describe the general NEPA requirements/standards for mitigation and monitoring; whereas the specific SG related mitigation, monitoring, adaptive management strategies responses are in section 7.9

Plan	Issue Statement
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OR	The alternatives are overly focused on protecting GRSG and none of them meet FLPMA's multiple use mandate requirement.
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UT	The alternatives are overly focused on protecting sage grouse, would unnecessarily restrict energy development, and don't meet FLPMA's multiple use mandate requirement. BLM and Forest Service must comply with the provisions in FLPMA related to closing areas of 5,000 and 100,000 acres to minerals or other uses.
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ID-SW MT The DLUPA/EIS has failed to comply with the multiple-use mandates found in the BLM's FLPMA and the Forest Service's Multiple Use Sustained Yield Act because it has put protecting greater sage-grouse and sage-grouse habitat above legal requirements for balanced management.

NV-CA Alternatives in the DLUPA/EIS, particularly Alternatives C and F, failed to comply with the multiple-use mandates found in the BLM's FLPMA and the Forest Service's Multiple Use Sustained Yield Act because they are overly focused on protecting greater sage-grouse and sage-grouse habitat.

NWCO The alternatives are overly focused on protecting sage grouse and none of them meet FLPMA's multiple use mandate requirement.

Lewisto The DRMPA/DEIS is overly focused on  
wn protecting sage-grouse and does not meet  
FLPMA's multiple use mandate.

ND The DRMPA/DEIS is overly focused on protecting sage-grouse and does not meet FLPMA's multiple use mandate.

WY9

## Response

The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its RMPs, which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

As stated in Section 2.3.1 of the DRMPA/DEIS, the alternatives "fulfill the purpose and need for the RMPA." The RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need). The BLM's planning processes allow for analysis and consideration of a range of alternatives in the DRMPA/DEIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat. As stated on page 2-3, the alternatives "meet the purpose and need for the LUPA." The LUPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose and Need).

The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.

The Utah Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2). Both the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of

NOTE TO BLM: this is the full national response and has been reviewed by SOL:

The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.

The [name of particular amendment] is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of its being listed (see Section I.XX, Purpose and Need). Both, the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. For

The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.

The Nevada and Northeast California LUPA/DEIS is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of its being listed (see Section 1.1.3, Purpose and Need). Both, the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. For example, [insert one or more examples of the range of actions considered, include references to sections/table where



As stated on page 32, the alternatives “meet the purpose and need for the LUP or LUPA.” The LUPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose of and Need for the Land Use Plan Amendments, on page 6).

The BLM’s FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM’s multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the United States (US) Department of the Interior, Bureau of Land Management (BLM) to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

Consistent with the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA), the Forest Service manages National Forest System land to sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas. The Forest Service is required by statute to have a national planning rule: the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976, requires the Secretary of Agriculture to issue regulations under the principles of the Multiple-Use Sustained-Yield Act of 1960 for the development and revision of land management plans.

The Northwest Colorado Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose of and Need for the Land Use Plan Amendments, on page 6). Both the Forest Service’s and BLM’s planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified

As stated on page 2-3 (Section 2.3.1) of the DRMPA/DEIS, the alternatives “meet the purpose and need for the Lewistown Field Office Greater Sage-Grouse RMPA.” The RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3).

The BLM’s FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM’s multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its RMPs, which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

The Lewistown Field Office Greater Sage-Grouse RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3). The BLM’s planning processes allow for analysis and consideration of a range of alternatives in the DRMPA/DEIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. Section 3.3.1, Conditions of the Planning Area, provides an overview of current uses on public lands that may threaten GRSG habitat and populations. The DRMPA/DEIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Additionally, the BLM developed the Lewistown Field Office Sage-Grouse DRMPA/DEIS with involvement from 12 cooperating agencies (see DRMPA/DEIS Section 6.3, Cooperating Agencies, on page 6-4), including USFWS, MFWP, Montana

As stated on page 2-3 (Section 2.3.1) of the DRMPA/DEIS, the alternatives "meet the purpose and need for the North Dakota Greater Sage-Grouse RMPA." The RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and is limited to the very southwestern portion of the North Dakota Field Office. (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3).

The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The BLM's multiple-use mandate does not require that all uses be allowed on all areas of the public lands. The purpose of the mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its RMPs, which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

The North Dakota Greater Sage-Grouse RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3). The BLM's planning processes allow for analysis and consideration of a range of alternatives in the DRMPA/DEIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMPA/DEIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. As stated in Section 1.7, Development of Planning Criteria (p. 1-113), the RMPA will recognize valid existing rights. Under Alternative D, during implementation level review and decisions, (e.g., approval of an APD, Sundry Notice, etc.) and upon completion of the environmental record of review (43 CFR 3162.5), evaluate whether the conservation measure is "reasonable" (43 CFR 3101.1-2) with the valid existing rights (see pages 2-33 and 2-34 in the DEIS).

Additionally, the BLM developed the North Dakota Greater Sage-Grouse DRMPA/DEIS with involvement from cooperating agencies (see DRMPA/DEIS Section 6.3, Cooperating Agencies, on page 6-4), including USFWS, NDGFD, Bowman County Commissioners, and Bowman-Slope Conservation District to ensure that a balanced multiple-use management strategy to



Plan	Issue Statement
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OR	n/a
UT	Detailed habitat assessments will need to be completed on a project-by-project basis since the data is not at a fine enough scale to determine where non-GRSG habitat exists in mapped habitat areas. This will cause undue burdens on companies who will have to complete these assessments, adding to project costs and schedule delays
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto wn	Commenters suggested that the RMPA/DEIS provide inventories of public lands, and their resources and values.

ND  
WY9

## Response

n/a

As part of the LUPA process, the BLM and Forest Service will make land use planning decisions and utilize data appropriate for that scale of planning and analysis. Conducting field investigations prior to construction is a standard requirement at the implementation level, with involvement of private industry, the BLM, and other appropriate parties. The LUPA/EIS does not define who will conduct these investigations since this decision will be made at the implementation level.

n/a

n/a

n/a

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Lewistown Field Office Greater Sage-Grouse RMPA is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in Chapter 3 in the Lewistown Field Office Greater Sage-Grouse RMPA is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the RMPA/EIS. For example, listing every water quality-impaired stream within the planning area by name would not provide useful information at this broad-scale analysis, particularly where the proposed plan alternatives did not vary the level of riparian protections to provide reduced levels for non-impaired streams. The riparian protections within each alternative were applied to all streams, whether or not they were water quality-impaired. However, understanding the miles of impaired BLM streams, as presented in the DLUPA/EIS at Section 3.18.2, is useful in establishing a baseline by which the BLM may analyze the relative effects of each alternative's broad-based approach.

As specific actions come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as n/a



Plan	Issue Statement
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OR	BLM did not undertake its coordination and consistency review obligations required by FLPMA. The BLM's actions considered in the alternatives conflict with local and state agency plans and policies; furthermore, the BLM did not coordinate with agencies to ensure that conservation measures are as consistent as possible with other planning jurisdictions.
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UT The BLM's actions considered in the alternatives conflict with local and state agency plans and policies; furthermore, the BLM did not coordinate with agencies to ensure that conservation measures are as consistent as possible with other planning jurisdictions. A request was made for BLM to provide a detailed listing of every federal law that overrides the County plan with an accompanying description of the limits of the law and its impacts on County's plan, program and policy.

ID-SW The BLM's actions considered in the  
MT alternatives conflict with local and state agency plans and policies; furthermore, the BLM did not review all of the county and state plans to ensure that conservation measures are as consistent as possible with other planning jurisdictions.

NV-CA The DEIS and LUPA process did not comply with the BLM's requirements to be consistent with other federal, state, local, and tribal plans and policies. Commenters specifically noted that BLM's goals, objectives, and management actions are inconsistent with the Nevada Rangeland Monitoring Handbook (NCE 2006), Pershing County, Nevada Land Use Planning, specifically the Pershing County Natural Resources Land Use Plan (County Plan) and the Pershing County Master Plan, the State of Nevada's Sagebrush Ecosystem Program, the 2011 Nye County Comprehensive Master Plan and the Elko County Sage Grouse Plan, Lincoln County's policy of "no net loss" of AUMs within the County, the Lincoln County Lands Acts, the Ely Resource Management Plan (the prohibition on disposals within PPMAs and PGMA's is in conflict with both), Lander County's sage grouse strategy, and the the Eureka County Master Plan and our other plans, policies, and controls. Additionally, the BLM failed to note in the DEIS what if any effort has been completed

NWCO The BLM's actions considered in the alternatives conflict with local and state agency plans and policies; furthermore, the BLM did not coordinate with agencies to ensure that conservation measures are as consistent as possible with other planning jurisdictions.

Lewisto wn The BLM's actions considered in the alternatives conflict with local and state agency plans and policies; furthermore, the BLM did not coordinate with agencies to ensure that conservation measures are as consistent as possible with other planning jurisdictions. A request was made for BLM to disclose the implications of the 2013 Draft Montana Greater Sage-Grouse Habitat Conservation Strategy (Montana Strategy) in the FEIS.

ND n/a  
WY9

## Response

The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of Indian tribes, other Federal agencies, and State and local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with State and local governments during preparation of the Draft RMPA/EIS. The Draft RMPA/EIS lists the cooperating agencies actively involved in the planning process in Section 6.3. To assist in the consistency review, the BLM requested the state, county, and tribal government cooperating agencies review the Draft RMPA/EIS and identify potential inconsistencies between the alternatives and each agency's applicable plans. This allowed state and local cooperating agencies to use their special expertise regarding the familiarity with their own state or local plans.

To assist in the consistency review, the BLM requested the state, county, and tribal government cooperating agencies review the draft RMPA/EIS and identify potential inconsistencies between the alternatives and each agency's applicable plans. This allows the state, local, and tribal cooperating agencies to use their special expertise regarding the familiarity with their own state, local, or tribal plans. On the local level, it is a county's responsibility to accurately identify and communicate any inconsistencies between that county's plan and the proposed alternative.

[Note to BLM: UTSG has a section for Coordination and Consistency, does ORSG need to add one?]

The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the RMPA/EIS; a list of these plans can be found in Section 1.7, Relationship to Other Policies, Plans, and Programs. While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls within the EIS. This information has been updated in the FEIS.

[Note to BLM: Need to add this sentence (regarding obligations) to Section 1.7, Relationship to Other Policies, Plans, and Programs, of the FEIS. Also need to ensure that the FEIS describes any such inconsistencies.]

The BLM coordinates with cooperating agencies commensurate with each agency's recognized jurisdiction or expertise. In areas where the State of Oregon has clear jurisdiction, such as wildlife populations, the BLM has worked closely with that State agency. In cases where a county or agency has expertise, such as local county socioeconomic information, the BLM has worked closely with the group to incorporate the information into the EIS. However, the Oregon GRSG RMPA/EIS applies to BLM-managed lands only and does not make any management decisions on State or local lands. Land use plans play a

The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of Indian tribes, other Federal agencies, and State and local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with State and local governments during preparation of the Draft LUPA/EIS. The Draft LUPA/EIS lists the cooperating agencies actively involved in the planning process in Section 5.3. As described in Section 5.4, Coordination and Consistency, the BLM requested the state, county, and tribal government cooperating agencies assist in the consistency reviews by reviewing the range of alternatives associated with the draft LUPA/EIS and identify potential inconsistencies between the alternatives and each agency's applicable plans. This allows the state, local, and tribal cooperating agencies to use their special expertise regarding the familiarity with their own state, local, or tribal plans. On the local level, it is a county's responsibility to accurately identify and communicate any inconsistencies between that county's plan and the proposed alternative.

The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the LUPA/EIS; a list of these plans can be found in Section 1.8, Relationship to Other Policies, Plans, and Programs. The BLM is aware that there are specific State or local laws relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. As a consequence, there may be inconsistencies that cannot be reconciled. The FLPMA requires that BLM's land use plans be consistent with State and local plans "to the extent practical". In a situation where State and local plans conflict with Federal law, there will be an inconsistency that cannot be resolved. Thus, while State County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls within the EIS, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. This information has been updated in the FEIS in Section 1.8.

The BLM coordinates with cooperating agencies commensurate with each agency's recognized jurisdiction or expertise. In areas where the State of Utah has clear jurisdiction, such as wildlife populations, the BLM has worked closely with that State. The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of Indian tribes, other Federal agencies, and State and local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with State and local governments during preparation of the Draft LUPA/EIS. The Draft LUPA/EIS lists the cooperating agencies actively involved in the planning process in Section 6.XX. The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the LUPA/EIS; a list of these plans can be found in Chapter 1, Section 1.XX, Relationship to Other Policies, Plans, and Programs. While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls within the EIS. This information has been updated in the FEIS. [NOTE TO BLM: Might need to add this sentence (regarding obligations) to Section 1.7, Relationship to Other Policies, Plans, and Programs, of the FEIS. Also need to ensure that the FEIS describes any such inconsistencies.]

The BLM coordinates with cooperating agencies commensurate with each agency's recognized jurisdiction or expertise. In areas where the State of Idaho has clear jurisdiction, such as wildlife populations, the BLM has worked closely with that State agency. In cases where a county or agency has expertise, such as local county socioeconomic information, the BLM has worked closely with the group to incorporate the information into the EIS.

NOTE TO BLM: plans, policies that commenters felt needed to be reviewed for consistency:

Gooding conservation district sage grouse conservation plan

National Academy of Sciences 2013 recommendations for the WHB program

State of MT sage-grouse management strategy

NOTE TO BLM: need to review all of the noted plans/policies for consistency. Update FEIS to include statement (paragraph) to confirm that there are no inconsistencies. Or if there are inconsistencies, how BLM has chosen to resolve them. Include rationale for why or why not inconsistencies were corrected.

In response, include direction to the reader where they can find the new/updated information in the FEIS. E.g., "See Section XXX in the FEIS for additional details."

The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of Indian tribes, other Federal agencies, and State and local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with State and local governments during preparation of the Draft LUPA/EIS. The Draft LUPA/EIS lists the cooperating agencies actively involved in the planning process in Section 6.4. The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the LUPA/EIS; a list of these plans can be found in Chapter 1, Section 1.7, Relationship to Other Policies, Plans, and Programs (see page 26). While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls within the EIS. This information has been updated in the FEIS. *[NOTE TO BLM: Need to add this sentence (regarding obligations) to Section 1.7, Relationship to Other Policies, Plans, and Programs, of the FEIS. Also need to ensure that the FEIS describes any such inconsistencies.]*

The BLM coordinates with cooperating agencies commensurate with each agency's recognized jurisdiction or expertise. In areas where the State of Colorado has clear jurisdiction, such as wildlife populations, the BLM has worked closely with that

The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of Indian tribes, other Federal agencies, and State and local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with State and local governments during preparation of the Draft RMPA/EIS. The Draft RMPA/EIS lists the cooperating agencies actively involved in the planning process in Section 6.3. As described in Section 6.3, starting on June 26, 2012, the BLM has conducted four meetings to date with cooperating agencies. The focus of the meetings was to explain the purpose and need for the RMPA/EIS and the process and to develop a sub-regional management alternative. The entities that were invited to become cooperating agencies were also encouraged to attend the scoping open houses and provide comments during the scoping period (Section 6.1.1). In addition agencies were invited to attend meetings for the draft EIS and encouraged to submit comments on the draft. These agencies have been engaged throughout the planning process, including during alternatives development.

The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the RMPA/EIS; a list of these plans can be found in Chapter I, Section I.8, Relationship to Other Policies, Plans, and Programs. While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls in the decision record for the EIS. [NOTE TO BLM: Need to add this sentence (regarding obligations) to Section I.7, Relationship to Other Policies, Plans, and Programs, of the FEIS. Also need to ensure that the FEIS describes any such inconsistencies.]

The BLM coordinates with cooperating agencies commensurate with each agency's recognized jurisdiction or expertise. In areas where the State of Montana has clear jurisdiction, such as wildlife populations, the BLM has worked closely with that State agency. In cases where a county or agency has expertise, such as local county socioeconomic information, the BLM has worked closely with the group to incorporate the information into the EIS.

n/a





Plan	Issue Statement
OR	The BLM has failed to coordinate with Harney counties as required by the FLPMA. Adel Water Improvement District requested BLM consult, cooperate, and coordinate with them when developing the PRMPA.

UT n/a  
 ID-SW n/a  
 MT  
 NV-CA n/a  
  
 NWCO n/a  
 Lewisto n/a  
 wn  
 ND n/a  
 WY9

**NOTE TO EMPSI: MOVE ORSG TO SECTION 4.2 TO BE CONSISTENT WITH OTHER SUBREGIONS**

## Response

Both the CEQ and BLM Planning regulations define cooperating agency status, including what it is, who is eligible to become a cooperating agency, and how the lead agency should invite participation as a cooperating agency (40 CFR 1501 and 1508; 43 CFR 1601.0-5). Cooperating relationships are limited to government entities: state agencies, local governments, tribal governments, and other Federal agencies that have jurisdiction by law or special expertise. Additionally, per the regulations and BLM policy, there is no coordinating agency status (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 21 and 31, respectively). To be a cooperating agency, the local agency must meet the eligibility criteria set out in the regulations and policies. The specific role of each cooperating agency is based on jurisdiction by law or special expertise, which is determined on an agency-by-agency basis and identified in the Memorandum of Understanding.

These relationships were described in the Draft EIS in Section 6.3, Cooperating Agencies (page 6-2). In December 2011, the BLM sent letters to 35 letters to local, state, federal, and tribal governments inviting them to be a cooperating agency for the Oregon GRSG EMPA/EIS. The BLM also sent 7 more follow-up letters to Native American tribes. To date, 12 agencies agreed to participate on the EIS as designated cooperating agencies, all of which have signed Memoranda of Understanding with the BLM's Oregon State Office (Table 6-1, Cooperating Agencies). The County of Harney was one of the invited agencies and accepted the invitation.

In addition to the BLM's invitations to a wide variety of agencies to participate as Cooperating Agencies, DOI regulations (43 CFR 46.225(c)) require the BLM, as lead agency, to consider any request by a government entity to participate as a Cooperating Agency (BLM Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners, pages 8-9). From the time that the Notice of Intent was published and throughout the development of the EIS, an agency could notify the BLM requesting to Cooperating Agency status. However, the BLM did not receive this notification from any agency or entity requesting BLM to consider them for Cooperating Agency status during development of the Draft EIS nor in any of the Draft EIS comment letters; as a result, only the agencies described in Section 6.3 were Cooperating Agencies in the development of the EIS.

All agencies participating as cooperating agencies have been given opportunities to participate during various steps of the planning process, including regular briefings, requests for input on draft alternatives and the administrative draft EIS, and identification of issues and data during scoping and during the DEIS comment period, as required by 40 CFR 1503.2 and 40

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR n/a

UT Forest Service should have used the 2012 planning regulations, and must explain why they used the 1982 regulations.

[NOTE TO EMPSi: Change section name to Forest Service Planning Role for all future documents.]

ID-SW The BLM did not provide an explanation for  
MT how and why they defined the planning area as they did.

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

The BLM and the Forest Service began working together to address conservation of the greater sage-grouse and its habitat in 2010. At that time, the Forest Service's 2012 Planning Rule was not final; it became final May 9, 2012. For plan amendments initiated before May 9, 2012, the Forest Service may complete and approve the amendments under the prior planning regulations, including its transition provisions (36 CFR part 219, published at 36 CFR parts 200 to 299, revised as of July 1, 2010). Land use plan amendments associated with the greater sage-grouse conservation effort are using the 1982 planning rule procedures that are allowed under the transition procedures of the prior planning rule. The 1982 planning rule procedures may be found in 36 CFR parts 200 to 299 Revised as of July 1, 2000 or at [NOTE TO BLM: This is from a national response.]

The framework for the scope of analysis for the project is based upon the BLM and the Forest Service Planning and NEPA manual and handbooks definitions of the planning, decision, and analysis areas. Specifically, Forest Service Manual 1900-Planning Chapter, Zero Code defines the Area of Analysis as "The geographic area within which ecosystems, their components, or their processes are evaluated during analysis and development of one or more plans, plan amendments, or plan revisions. This area may vary in size depending on the relevant planning issue. For a plan, an area of analysis may be larger than a plan area. For development of a plan amendment, an area of analysis may be smaller than the plan area and include multiple ownerships."

For this environmental impact statement, decision areas are those public lands and mineral estates within the planning area that are encompassed by all designated habitat (ADH) (which includes preliminary priority habitat [PPH], preliminary general habitat [PGH], and linkage/connectivity habitat).

Planning Area. The geographic area within which the BLM will make decisions during a planning effort. A planning area boundary includes all lands regardless of jurisdiction; however the BLM will only make decisions on lands that fall under the BLM's jurisdiction (including subsurface minerals). Unless the State Director determines otherwise, the planning area for a RMP is the geographic area associated with a particular field office (43 CFR 1610.1(b)). State Directors may also establish regional planning areas that encompass several field offices and/or states, as necessary.

Plan areas. National Forest System lands covered by land use plans. (36 CFR 219.16)

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR	The BLM has failed to document how the EIS and/or actions considered in the EIS comply with other laws, including Stock Raising Homestead Act of 1916, Administrative Procedure Act (APA), the Energy Policy Act of 2005, Mining and Minerals Policy Act of 1970, Common School Fund (via the Oregon Admissions Acts and the Oregon Constitution), and the Endangered Species Act.
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UT	The BLM has failed to document how the EIS and/or actions considered in the EIS comply with other laws, including the Surface Mining Control and Reclamation Act , Data Quality Act, Regulatory Flexibility Act, Onshore Orders regulating oil and gas development, Energy Policy Act of 2005, Energy Policy and Conservation Act of 2000, Mining and Minerals Policy Act of 1970, Federal Advisory Committee Act, 2000 Defense Department Appropriations Act, and the Taylor Grazing Act.
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ID-SW MT The BLM has failed to document how the EIS and/or actions considered in the EIS comply with other laws, including all Onshore Orders regulating oil and gas development, the Energy Policy Act of 2005 and Energy Policy and Conservation Act of 2000, the Taylor Grazing Act, the Mining and Minerals Policy Act, the Information Quality Act, the Wild Horse and Burro Act, other multiple use mandates (e.g., Multiple-Use Sustained Yield Act of 1960, Forest and Rangeland Renewable Resources Planning Act of 1974, National Forest Management Act of 1976), and compliance with other federal agency regulations (e.g., XXX).

NV-CA The Draft LUPA/EIS does not clearly describe how proposed management actions would comply with other laws, including the General Mining Law, the Taylor Grazing Act, the Public Rangeland Improvement Act, the Energy Policy Act of 2005 and Energy Policy and Conservation Act of 2000, other multiple use mandates (e.g., Multiple-Use Sustained Yield Act of 1960, Forest and Rangeland Renewable Resources Planning Act of 1974, National Forest Management Act of 1976), other federal agency regulations (e.g., Federal Regulatory Energy Commission), and state laws (e.g. Nevada Water Laws).



NWCO The BLM has failed to document how the EIS and/or actions considered in the EIS comply with other laws, including all Onshore Orders regulating oil and gas development, the Energy Policy Act of 2005 and Energy Policy and Conservation Act of 2000, other multiple use mandates (e.g., Multiple-Use Sustained Yield Act of 1960, Forest and Rangeland Renewable Resources Planning Act of 1974, National Forest Management Act of 1976), and compliance with other federal agency regulations (e.g., Federal Regulatory Energy Commission).

Lewisto Commenters requested the BLM to explain why the 2011 GRSG IMs, which add substantive requirements to the National Strategy, and the NOI do not require conformity with the Administrative Procedure Act (APA). The DEIS does not meet the USFWS PECE policy standards. Additionally, commenters state that the BLM should have conducted NEPA analysis on the ND The DRMPA/DEIS is contrary to the Taylor Grazing Act.

## Response

[NOTE TO BLM: This response may need to go up the chain for review.]

The Oregon Greater Sage-Grouse RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose and Need). The BLM's planning processes allow for analysis and consideration of a range of alternatives in the RMPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The RMPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

The BLM developed the Oregon Greater Sage-Grouse Draft RMPA/DEIS with involvement from cooperating agencies (see DEIS Section 6.3, Cooperating Agencies), including counties, state agencies, and federal agencies, to ensure that a balanced multiple-use management strategy to address the protection of GRSG while allowing for utilization of renewable and nonrenewable resources on the public lands.

The Draft EIS Section 2.5.1, Management Common to All Alternatives, states that all alternatives would comply with state and federal laws, regulations, policies, and standards, including FLPMA multiple use mandates and the implementation of actions originating from laws, regulations, and policies and conformance to day-to-day management, monitoring, and administrative functions not specifically addressed.

[NOTE TO BLM: This response may need to go up the chain for review.]

As noted under Section 5 of this Report, the Draft LUPA/EIS is consistent with the BLM's FLPMA and the Forest Service's Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA). The Utah Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose and Need). Both the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Additionally, the BLM and the Forest Service developed the Utah Greater Sage-Grouse Draft Land Use Plan Amendment/DEIS with involvement from cooperating agencies (see DEIS Section 5.3), including counties, state agencies, federal agencies, and tribes, to ensure that a balanced multiple-use management strategy to address the protection of GRSG while allowing for utilization of renewable and nonrenewable resources on the public lands.

The Final EIS has been updated in Section 1.8, Relationship to Other Policies, Plans, and Programs, to state that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies. Actions in the Proposed LUPA have been reviewed and found to be consistent and within the bounds of all required laws, regulations, and policies.

Consistent with the BLM's regulations (43 CFR 4130.2(a)) and Land Use Planning Handbook (H-1601-1, Appendix C(II)(B)), the Utah Greater Sage-Grouse LUPA makes appropriate land use planning decisions by identifying lands available or not available for livestock grazing (see DLUPA/DEIS Table 2.1). Further, the Utah Greater Sage-Grouse LUPA complies with the Taylor Grazing Act, which does not preclude the BLM from identifying some lands not available to livestock grazing. As stated in Section 2.1, the action alternatives "meet the purpose and need for the Utah Greater Sage-Grouse LUPA."

On February 9, 2012, the BLM published its updated Information Quality Guidelines in accordance with direction provided by OMB and the Department of the Interior's Data Quality Guidelines. BLM's guidelines are intended to ensure that any information disseminated by the BLM will be high quality, accurate, useable information. If a member of the public feels that

[NOTE TO BLM: This response may need to go up the chain for review.]

As noted under Section 5 of this Report, the Draft LUPA/EIS is consistent with the BLM's FLPMA and the Forest Service's Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA). The Idaho Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose of and Need for the Land Use Plan Amendments). Both the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. Additionally, the BLM and the Forest Service developed the Idaho Greater Sage-Grouse Draft Land Use Plan Amendment/DEIS with involvement from cooperating agencies (see DEIS Section 6.3, Cooperating Agencies), including [ID state wildlife agency, counties, etc.] to ensure that a balanced multiple-use management strategy to address the protection of greater sage-grouse while allowing for utilization of renewable and nonrenewable resources on the public lands. The Draft EIS Section 2.5, Management Common to All Alternatives (pages 39 and 40), states that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies. Actions in the Proposed LUPA have been reviewed and found to be consistent and within the The DEIS Section 2.5, Management Common to All Alternatives (page 15), states that all alternatives would comply with state and federal laws, regulations, policies, and standards, and implement actions originating from laws, regulations, and policies.

Also, as noted under Section 5 of this Report, the Draft LUPA/EIS is consistent with the BLM's FLPMA and the Forest Service's Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA). The Nevada and Northeastern California Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.3, Purpose of and Need for the Land Use Plan Amendments). Both the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Additionally, the BLM and the Forest Service developed the Nevada and Northeastern California Greater Sage-Grouse Land Use Plan Amendment /DEIS with involvement from cooperating agencies (see DEIS Section 6.3, Cooperating Agencies),

*[NOTE TO BLM: This response may need to go up the chain for review.]*

As noted under Section 5 of this Report, the Draft LUPA/EIS is consistent with the BLM's FLPMA and the Forest Service's Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528–531) (MUSYA). The Northwest Colorado Greater Sage-Grouse Land Use Plan Amendment is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve greater sage-grouse and to respond to the potential of it being listed (see DEIS Section 1.2, Purpose of and Need for the Land Use Plan Amendments, on page 6). Both the Forest Service's and BLM's planning processes allow for analysis and consideration of a range of alternatives in the DLUPA/EIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore greater sage-grouse habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DLUPA/EIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Additionally, the BLM and the Forest Service developed the Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment/DEIS with involvement from cooperating agencies (see DEIS Section 6.3, Cooperating Agencies, on page 986 et al.), including Colorado Department of Parks and Wildlife, Garfield County, and 20 others, to ensure that a balanced multiple-use management strategy to address the protection of greater sage-grouse while allowing for utilization of renewable and nonrenewable resources on the public lands.

*[NOTE TO BLM: this issue will need review by the National Comment team.]*

The North Dakota Greater Sage-Grouse RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3). The BLM's planning processes allow for analysis and consideration of a range of alternatives in the DRMPA/DEIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMPA/DEIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Consistent with the BLM's regulations (43 CFR 4130.2(a)) and Land Use Planning Handbook (H-1601-1, Appendix C(II)(B)), the North Dakota Greater Sage-Grouse RMPA makes appropriate land use planning decisions by identifying lands available or not available for livestock grazing (see DRMPA/DEIS Table 2-3, page 2-29). Further, the North Dakota Greater Sage-Grouse RMPA complies with the Taylor Grazing Act, which does not preclude the BLM from identifying some lands not available to livestock grazing. As stated on page 2-3 (Section 2.3.1), the alternatives "meet the purpose and need for the North Dakota



Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO	n/a
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Lewistow	n/a
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ND	n/a
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WY9	
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Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
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OR	Commenters contended that the NTT report violated NEPA and FLPMA and contained arbitrary and unjustified recommendations related to several topic areas including livestock grazing management, locatable minerals management, sagebrush cover requirements, and the anthropogenic disturbance cap.
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UT Commenters had two opposing views regarding the NTT report. One group suggested that the BLM and the Forest Service should not use the NTT report for various reasons, including that it:

- Is not based on local conditions.
- Has methodological and technical errors.
- Was not peer-reviewed.
- Has authors with conflicts of interests.

In addition, BLM Washington Office Instruction Memorandum 2012-044 directing consideration of the NTT report expired in September 2013, prior to the release of the Draft LUPA/EIS, and thus the NTT report does not need to be considered. The agencies have not justified the need for using the NTT report as the basis for GRSG management direction. Another group suggested that the BLM and Forest Service did not go far enough in conserving GRSG by weakening the recommendations of the NTT report; the findings in the NTT report should have been used as is, without any changes.

ID-SW  
MT Commenters contended that the NTT report is not based on the best available science, and recommendations are overly burdensome. Commenters also assert that the NTT report contains technical and methodological errors, is not based on local conditions, and has not undergone adequate peer review. Commenters questioned why the NTT report was used when the IM requiring its use has expired.

NV-CA Commenters contended that findings contained in the NTT report are based on science that is flawed, arbitrary, outdated, and narrowly focused. Commentors also assert that the NTT report contains technical errors, does not comply with existing laws, and has not undergone adequate peer review.

NWCO Commenters had two opposing views regarding the NTT report. One group suggested that the BLM and the Forest Service should not use the NTT report and only follow existing agency policy for conserving greater sage-grouse. The agencies have not justified the need for using the NTT report as the basis for greater sage-grouse management direction. Another group suggested that the BLM and FS did not go far enough and watered-down the recommendations of the NTT report; the findings should have been used as is, without any changes.

Lewisto Commenters asserted that the NTT report  
wn is inconsistent with FACA and is biased against oil and gas development.

ND It is inappropriate to use the NTT report as the basis for the DRMPA/DEIS as it is overly biased against energy development and fails to consider newer research that considers oil and gas technological advancements.

WY9

## Response

A National Technical Team (NTT) was formed as an independent, science-based team made up of representatives from the BLM, US Fish and Wildlife Service, Natural Resources Conservation Service, US Geological Survey, and state wildlife agencies from Colorado, Nevada, Oregon, Idaho, and Utah, to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM planning efforts through management considerations to ameliorate threats, focused primarily on priority greater sage-grouse habitats on public lands. In a letter to Secretary Salazar, dated January 15, 2013, more than 100 scientists endorsed the NTT report, stating that it, “represented comprehensive compilation of the scientific knowledge needed for conserving Sage-Grouse” and that it “offers the best scientifically supportable approach to reduce the need to list Sage-Grouse as a Threatened or Endangered species.” The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

- As a starting point for developing a range of alternatives, the BLM used the NTT report and the Conservation Objectives Team (COT) report, both of which were based upon the best scientific and commercial data available at the time. These reports were not the only source of information for developing a range of alternatives (see Section 7.5, Range of Alternatives). The purpose of these reports were to identify key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. Further, the Summary of

The NTT report was not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

In addition to the NTT report, the BLM and Forest Service used the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for GRSG conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved, and the Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and management objectives.

The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, Forest Service Interim Conservation Recommendations for Greater Sage-Grouse and Greater Sage-Grouse Habitat (2012), and State management plans. Input from the BLM and Forest Service interdisciplinary teams and cooperating agencies has also been incorporated. The BLM and Forest Service also incorporated information from scientific literature not included in the above recommendations (e.g., science regarding noise, tall structures, and roads). The alternatives represent different degrees of and approaches to balancing GRSG species and habitat conservation among other resources and resource uses, competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. For example, Alternative D incorporates adjustments to the NTT report (NTT 2011) based on interdisciplinary team and cooperating agency input and addresses local ecological site variability to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses. PPMAs would be managed so that

A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM planning efforts through management considerations to ameliorate threats, focused primarily on priority greater sage-grouse habitats on public lands. The NTT report cited 122 references including published papers published from the formal scientific literature such as Journal of Wildlife Management, Conservation Biology, Biological Conservation, Wildlife Biology, BioScience and others, as well as graduate theses and dissertations, conservation strategies, FWS 2010 finding, and others representing the best available science. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

As a starting point for developing a range of alternatives, the BLM and FS used the NTT report and the Conservation Objectives Team (COT) report, both of which were based upon the best scientific and commercial data available at the time. The purpose of these reports were to identify key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. Further, the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) provided additional sources of baseline information and management objectives. [NOTE TO BLM- Clarify in FEIS the policy requirements for Administrative Procedure Act (APA), NEPA relative to IM, and NTT and clarify the NTT process and FACA in the FEIS.]

~~[BLM: Insert rationale for use of IM after expiration]~~ BLM is implementing IM 2012-044 through the Greater Sage-grouse planning effort. When an IM expires without being superseded, it can still be applicable and provide guidance to the BLM. The fact that IM 2012-044 expired does not mean the BLM has no authority to continue to analyze the conservation measures identified in the NTT Report. The BLM is appropriately considering and evaluating the measures in the NTT

A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage greater sage-grouse habitat is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based conservation measures to promote sustainable greater sage-grouse populations (Need to reword. BLM/FS manage habitat not populations.). The NTT is staying involved as the BLM and the Forest Service work through the LUPA/EIS to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented (I don't think this is an accurate statement. I think someone needs to pull the exact language out of each of these reports and use them in these paragraphs.).

As a starting point for developing a range of alternatives, the BLM and FS used the NTT report and the Conservation Objectives Team (COT) report, both of which were based upon the best scientific and commercial data available at the time. The purpose of these reports were to identify key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which threats need to be reduced for the species to be conserved. (The NTT should not be included in this sentence. It did not identify key areas, key threats etc.) Further, the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) provided additional sources of baseline information. [BER did not provide management objectives-just the best available science. Straight from the BER report page 7:

This document is designed to inform and advance large-area, regional conservation efforts by consolidating information regarding rangewide and regional information about sage-grouse populations and habitats and to act as a bridge between these large-area efforts and regional and local management efforts (that is, forest and range management plans) by providing



*[NOTE to NCT: FS commenter noted need to further clarify how the NTT report was used in EIS process and its relevance in the analysis/alternatives. Specifically should state that the NTT was formulated by the BLM and included representation of members with expertise in sage-grouse management from a number of state and federal agencies. Suggested providing wording that is specific to NTT (as this is the point of the comments, not so much about the COT & BER). Perhaps need to develop wording for responses specific to COT, NTT, & BER individually??]*

A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report and State management plans [continue to list any other sources of actions included in the alternatives]. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. [Example language: For example, Alternative XX incorporates adjustments to the NTT report (NTT 2011) based on cooperating agency input to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses.

Anthropogenic surface disturbance would be managed not to exceed [insert appropriate number or percentage] in ecological sites that support sagebrush within PPH (Figure 2-1, Ecological Sites Supporting Sagebrush in Preliminary Priority Habitat, in Appendix B, Figures). Additional information on disturbance cap management under Alternative D can be found in Appendix E, Disturbance Cap Management. Under Alternative D, the WRFO Reclamation Plan (Appendix F, Surface Reclamation Plan) would be followed for reclamation of lands to go back into rotation under the disturbance caps.]

Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM and the Forest Service management direction under at least one alternative [note which one(s)], which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the GRSG is reviewed, evaluated, and provided to the BLM in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable GRSG populations. The NTT report (NTT 2011) used the best current scientific knowledge to guide the BLM planning efforts through management considerations to ameliorate threats, focused primarily on priority GRSG habitats on public lands. The NTT is staying involved as the BLM work through the National GRSG Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

Under FACA, any time a Federal agency intends to establish, control, or manage a group that gives advice as a group and has at least one member who is not a Federal, Tribal, State, or local government employee, the agency must comply with FACA and the related administrative guidelines developed by the General Services Administration (GSA). The NTT was comprised of only Federal and State government employees and therefore FACA does not apply.

The NTT report (NTT 2011) was not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the GRSG is reviewed, evaluated, and provided to the BLM in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable GRSG populations. The NTT is staying involved as the BLM work through the National GRSG Planning Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented. In addition to the NTT report, the BLM used the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for GRSG conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved, and the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and management objectives.

The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State of North Dakota management plans. Additionally, the BLM interdisciplinary team also contributes to development of the ranges of alternatives. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. For example, Alternative D incorporates adjustments to the NTT report based on cooperating agency input to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses. Rather than the NTT recommendation to manage PH so that discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat (Alternative B), anthropogenic surface disturbance under Alternative D would be managed to protect PH from anthropogenic disturbances that would reduce distribution or abundance of GRSG.

Greater sage-grouse conservation measures in the NTT report were used to form BLM management direction under at least one alternative, Alternative B in the North Dakota Greater Sage-Grouse RMPA, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation

Need to discuss how using the NTT report doesn't violate NEPA. Also need to include why it's not arbitrary and capricious.

Key points to ensure are included in responses that need to address issue of NTT not scientifically sound:

--NTT scientifically valid

\*methodology is sound

\*peer-reviewed and generated

\*recognized experts in their field

\*recent, current literature and data

utilized for the report

--NTT scope appropriate for programmatic, broad planning level analysis

Use this response for the expired IM issue (WO & SOL provided):  
BLM is implementing IM 2012-044 through the Greater Sage-grouse planning effort. When an IM expires without being superseded, it can still be applicable and provide guidance to the BLM. The fact that IM 2012-044 expired does not mean the BLM has no authority to continue to analyze the conservation measures identified in the NTT Report. The BLM is appropriately considering and evaluating the measures in the NTT Report, in addition to any other relevant science, through the Greater Sage-grouse planning process.

Edit out the "range of alts" paragraphs (national response) to keep to the issue statement point about the NTT report being watered down. And that the NTT wasn't the only source for developing alts.

The BER was used for chapter 3 (baseline data for where disturbance was) and COT as the bar against which the alternatives were measured against.

Use info from UT response here to address the IM expiration issue.

Key points to ensure are included in responses that need to address issue of NTT not scientifically sound:

--NTT scientifically valid

- \*methodology is sound

- \*peer-reviewed and generated

- \*recognized experts in their field

- \*recent, current literature and data

utilized for the report

--NTT scope appropriate for programmatic, broad planning level analysis

Ensure that have rationale included for all these points (e.g., methodology is sound because it's based on accepted methodologies for this type of study)

Key points to ensure are included in responses that need to address issue of NTT not scientifically sound:

--NTT scientifically valid

- \*methodology is sound

- \*peer-reviewed and generated

- \*recognized experts in their field

- \*recent, current literature and data

utilized for the report

--NTT scope appropriate for programmatic, broad planning level analysis

Ensure that have rationale included for all these points (e.g., methodology is sound because it's based on accepted methodologies for this type of study)

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Ensure that have rationale included for all these points (e.g., methodology is sound because it's based on accepted methodologies for this type of study)

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Key points to ensure are included in responses that need to address issue of NTT not scientifically sound:

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- \*recognized experts in their field

- \*recent, current literature and data

utilized for the report

--NTT scope appropriate for programmatic, broad planning level analysis

Ensure that have rationale included for all these points (e.g., methodology is sound because it's based on accepted methodologies for this type of study)

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	The BER contains outdated baseline
MT	literature and the EIS should be updated with suggested literature.

NV-CA Verify that the correct name for the BER is used in the document. Not only check to see if the correct name is used, somehow need to make it clear that the name of the report changed from draft to final.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9



## Response

n/a

n/a

[NOTE TO BLM: The BLM is reviewing suggested literature and will include where necessary.]

~~National Response: The BER report is not the sole source of management decisions for the range of alternatives. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.~~

A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. ~~The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act.~~ The data for this report were gathered from BLM, Forest Service, and other sources and were the best available at the range-wide scale at the time collected. The report provides a framework for considering potential implications and management options, and demonstrates a regional context and perspective needed for local planning and decision-making.

The BLM reviewed the literature sources provided by commenters to determine if there were new or updated sources that should be considered in the EIS. BLM's findings of this review were... [insert the results from the literature review. While it doesn't directly address the BER report being updated, it's addressing the point that BLM did make the effort to consider new or updated info in the EIS in addition to the BER report.]

~~In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time~~

n/a

n/a

n/a

Response should stay focused on the point about outdated baseline data and delete the rest about alternatives, NTT and the COT.

Response should also note that the BLM is reviewing the literature. BLM's findings were...

BER title changing from "Draft" to "Final". Note in response whether there were any other updates/changes to the BER when it was finalized.

Plan	Issue Statement
OR	The BLM alternatives are not consistent with the COT report objectives. Several alternatives in the DEIS/LUPA could meet the COT report objectives if adaptive management strategy were implemented to account for the influences of wildfire in conjunction with a disturbance cap.

UT Commenters felt that the USFWS COT report was flawed for various reasons, including:

- Data quality issues and not representing the best available information.
- Subjectivity and overly biased.
- Not being comprehensive.
- Conflict of interest among peer reviewers.

As a result, commenters felt it should not have been used as the basis of the EIS alternatives.

ID-SW  
MT Commenters had two distinct views regarding the COT report. One group considered the report overly biased and not representative of the best available information. The other group suggested the DEIS was not fully consistent with the COT report habitat mapping and therefore requires revision to address those deficiencies.

NV-CA Commenters had two distinct views regarding the COT report. One group considered the report overly biased and not representative of the best available information. The other group suggested the DEIS was not fully consistent with and did not completely meet the COT report conservation objectives and therefore requires additional management actions or clarification to address those deficiencies.

NWCO Commenters had two opposing views regarding the COT report. One group considered the report overly biased and did not represent the best available information; therefore, it should not have been used as the basis of the EIS alternatives. The other group suggested the BLM and FS did not go far enough with the alternatives, and should have taken the actions directly or been consistent with the COT report conservation objectives.

Lewisto Commenters had two distinct views regarding the COT report. One group considered the report lacking in scientific integrity, inconsistent with other laws and mandates, and not representative of the best available information. The other group suggested the DEIS was not fully consistent with and did not completely meet the COT report conservation objectives and therefore requires additional management actions or clarification to address those deficiencies.

ND Commenters had two opposing views regarding the COT report. One group considered the report overly biased and did not represent the best available information; therefore, it should not have been used as the basis of the DRMPA/DEIS alternatives. The other group suggested the BLM needs to revise their alternatives regarding prescribed fire to be consistent with the COT report.

WY9

## Response

In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which threats need to be reduced for the species to be conserved. The report serves as guidance to Federal and state agencies, and others in focusing efforts to achieve effective conservation for this species. In addition to the COT report, the BLM and FS used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and as a starting place for developing management objectives.

In developing the Draft LUPA/EIS, the BLM and FS sought to develop a range of alternatives with management objectives and actions that are consistent with the conservation measures and objectives outlined in the COT Report. To conserve GRSG habitat, proposed management follows the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation. Appendix I demonstrates how the BLM and FS addressed the threats to the populations in the Nevada and Northeastern California sub-region. The BLM and FS are continuing to work with the FWS and State agencies to develop a proposed plan



In March 2012, the USFWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of state and FWS representatives released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for GRSG conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to federal land management agencies, state GRSG teams, and others in focusing efforts to achieve effective conservation for this species. The USFWS will use the COT report to evaluate the alternatives and measure the sufficiency of regulatory mechanisms in reducing threats for the various PACs. In addition to the COT report, the BLM and Forest Service used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and management objectives.

Additionally, development of the range of alternatives was based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, Forest Service Interim Conservation Recommendations for Greater Sage-Grouse and Greater Sage-Grouse Habitat (2012), and State management plans. Input from the BLM and Forest Service interdisciplinary teams and cooperating agencies has also been incorporated. The BLM and Forest Service also incorporated information from scientific literature not included in the above recommendations (e.g., science regarding noise, tall structures, and roads). The alternatives represent different degrees of and approaches to balancing GRSG species and habitat conservation among other resources and resource uses competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. For example, Alternative D incorporates adjustments to the NTT report (NTT 2011) based on interdisciplinary team and cooperating agency input and addresses local ecological site variability to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses. PPMAs would be managed so that discrete anthropogenic disturbances cover less than 5 percent of the total GRSG habitat regardless of ownership (Figure 2.3, Greater Sage-Grouse Priority/General Management Areas-Alternative D, in Appendix A, Maps). Alternative D, also includes mitigation, monitoring, and adaptive management strategies. Alternative D in some cases

In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species. In addition to the COT report, the BLM and FS used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and as a starting place for developing management objectives.

In developing the Draft LUPA/EIS, the BLM and FS sought to develop a range of alternatives with management objectives and actions that are consistent with the conservation measures and objectives outlined in the COT Report. To conserve GRSG habitat, proposed management follows the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.

Table 2-20 demonstrates how the BLM and Forest Service management actions under each alternative address the threats to the populations in the Idaho and southwestern Montana sub-region. In Idaho, Core and Important Habitat Zones under Alternative E were used to derive the PACs in the COT. [Can also reference the table in Chapter 4 showing overlap of habitat areas under each alternative with PACs] The BLM and Forest Service are continuing to work with the USFWS and State agencies to develop a proposed plan that fully addresses developing the appropriate triggers and identifying each of the threats in the COT report.

[NOTE TO BLM: Clarify in the FEIS the validity of NTT, COT, and BER as relative to the established standards of scientific integrity under the ESA, the Data Quality Act, and the Presidential and DOI memoranda and orders. Ensure the FEIS clarifies In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which threats need to be reduced for the species to be conserved. The report serves as guidance to Federal and state agencies, and others in focusing efforts to achieve effective conservation for this species. In addition to the COT report, the BLM and FS used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and as a starting place for developing management objectives.

In developing the Draft LUPA/EIS, the BLM and FS sought to develop a range of alternatives with management objectives and actions that are consistent with the conservation measures and objectives outlined in the COT Report. To conserve GRSG habitat, proposed management follows the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.

Appendix I demonstrates how the BLM and FS addressed the threats to the populations in the Nevada and Northeastern California sub-region. The BLM and FS are continuing to work with the FWS and State agencies to develop a proposed plan

In March 2012, the FWS initiated a collaborative approach to develop range-wide conservation objectives for the greater sage-grouse to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.

Additionally, development of the range of alternatives was based upon analysis of public scoping comments as well as information provided in the COT as well as several other sources, such as the NTT report, the BER, and the 2008 Colorado Greater Sage-grouse State Management Plans (see Section 1.1.1, 2.1.1, and Chapter 4 for references to how the reports and other information was used in alternative development). The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. For example, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some

In March 2012, the USFWS initiated a collaborative approach to develop range-wide conservation objectives for the GRSG to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for GRSG conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State GRSG teams, and others in focusing efforts to achieve effective conservation for this species. In addition to the COT report, the BLM used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and as a starting place for developing management objectives.

In developing the DRPA/DEIS, the BLM sought to develop a range of alternatives with management objectives and actions that are consistent with the conservation measures and objectives outlined in the COT Report. To conserve GRSG habitat, proposed management follows the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.

[Section 2.11 (Table 2-5) in the DRMPA/DEIS demonstrates how the BLM addressed the threats to the populations in the Lewistown Field Office planning area. Alternatives may reduce threats to varying degrees, but the primary and driving threats for the Yellowstone Watershed Population and Belt Mountains populations (Agriculture Conversion of private land) would remain. COT p. 65 further explains expectations for Yellowstone Watershed Population despite BLM efforts/restrictions for

In March 2012, the USFWS initiated a collaborative approach to develop range-wide conservation objectives for the GRSG to inform the 2015 decision about the need to list the species and to inform the collective conservation efforts of the many partners working to conserve the species. In March 2013, this team of State and USFWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for GRSG conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State GRSG teams, and others in focusing efforts to achieve effective conservation for this species. In addition to the COT report, the BLM used the National Technical Team (NTT) report and the Summary of Science, Activities, Programs, and Policies That Influence the Rangewide Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER) as additional sources of baseline information and management objectives.

The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, and State of North Dakota management plans. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat. For example, Alternative D incorporates adjustments to the NTT report (NTT 2011) based on cooperating agency input to provide a balanced level of protection, restoration, enhancement, and use of resources and services to meet ongoing programs and land uses. Rather than the NTT recommendation to manage PH so that discrete anthropogenic disturbances cover less than 3 percent of the total GRSG habitat (Alternative B), anthropogenic surface disturbance under Alternative D would be managed to protect PH from anthropogenic disturbances that would reduce distribution or abundance of GRSG.

Greater sage-grouse conservation measures in the NTT report (NTT 2011) were used to form BLM management direction under at least one alternative, Alternative B in the North Dakota Greater Sage-Grouse RMPA, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process).

Use the National response specific to the COT information.

This issue also needs to be split out.

1. COT Rpt
2. Disturbance cap
3. Adapt Manage

X-ref the sections where disturbance cap & adapt manage are responded to.

Revise the response to address the adequacy of the report. Key points to include:

- \*COT was used to assess the pop & habitat threats in current conditions
- \*based in scientifically accepted methodology for the type of study
- \*used relevant and current data for the report
- \*composition/expertise of team members who wrote the report. A USFWS product based on coordination between FWS and the States (G&F dpts & Gov's offices)

How used in alts:

- \*COT was what the FWS identified as conservation objectives that would help ameliorate threats to the GrSG pops & habitat. \*BLM/FS compared the range of alts to the COT objectives. Basically the grading bar against which the FWS is judging BLM/FS
- \*not the only scientific doc used as part of developing the alts
- \*During formulation of the FEIS, BLM/FS met with partners to help meet the COT report objectives to the extent practicable.

see points presented for response to UT issue and ensure key points and rationales are included in response as needed (COT = scientifically valid & used appropriately in EIS)

see points presented for response to UT issue and ensure key points and rationales are included in response as needed (COT = scientifically valid & used appropriately in EIS)

Might include additional info re: use of the COT as the bar which alternatives were assessed and findings from the results??

review response to ensure key points about COT validity & appropriate use in alts are included. See points noted in UT.



review response to ensure key points about COT validity & appropriate use in alts are included. See points noted in UT.

Plan	Issue Statement
OR	Commenters stated that BLM Washington Office Instruction Memoranda 2012-043 and 2012-044 should have undergone NEPA analysis since they constitute rulemaking.
UT	The BLM and Forest Service have existing guidance and policies to manage for special status species, including candidate species such as greater sage-grouse.
ID-SW MT	The BLM and Forest Service should include additional information to improve consistency with USFWS's Policy for Evaluation of Conservation Efforts.
NV-CA	Commenters expressed concern about the lack of consideration of BLM Manual 6840 in the EIS, particularly in the alternatives. In addition, commenters questioned the formation of alternatives based on the NTT report and why the NTT report was included especially since the IM has expired and has not been re-issued.

Lewisto n/a  
wn  
ND n/a  
WY9

## Response

{Note to BLM: May need a national response for this comment. Kate Krebs emailed Lauren Mermejo on April 16 for response.}

The BLM and Forest Service do have existing laws, regulations, and guidance for special status species including greater sage-grouse. These are listed in Chapter I under Section 1.7.1, Preliminary Planning Criteria, and Section 1.8, Relationship to Other Policies, Plans, and Programs. While such relevant guidance does exist, the USFWS finding stated that “existing regulatory mechanisms are inadequate to protect the species. The absence of adequate regulatory mechanisms is a significant threat to the species, now and in the foreseeable future.” This planning process is intended to provide more specific, planning-level direction for land managers in order to conserve GRSG on a sub-regional scale and by providing regulatory The BLM and Forest Service are working closely with the USFWS to ensure certainty of implementation and effectiveness to the extent possible. However, certain management actions, such as restoration activities, are contingent on funding availability and thus some uncertainty remains.

While not mentioned specifically, Manual 6840 is incorporated into the planning criteria under the following bullet (page I-X):

- The approved LUPAs will comply with BLM direction, such as FLPMA, NEPA, and CEQ regulations at 40 CFR Parts 1500-1508; DOI regulations at 43 CFR Part 4, and 43 CFR Part 1600, BLM Manual 6840; the BLM H-1601-1 Land Use Planning Handbook, "Appendix C: Program-Specific and Resource-Specific Decision Guidance Requirements" for affected resource programs (BLM 2005a); the 2008 BLM NEPA Handbook (H-1790-1; BLM 2008e); and all other applicable BLM policies and guidance.

~~{Note to BLM: Consider including more information on Manual 6840 in the EIS, perhaps mentioning it in the planning criteria bullet above and/or including more details under Alternative A.} it was added to the paragraph above and needs to be included in the FEIS~~

~~For further details related to how and why the NTT was used in alternative development, see response in section 7.1, NTT Report. The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage grouse Draft LUPA/EIS planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The alternatives are comprised of management actions, allocations, and BMPs/RDFs that serve as regulatory mechanisms to conserve greater sage grouse and their habitat. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (current management, Alternative A), which incorporates and analyzes existing guidance including BLM Manual 6840, IM 2005-024, Fundamentals for Standards for Rangeland Health, and existing BMPs.~~

~~The NTT report is not the sole source of management decisions used for the development of the range of alternatives. Greater sage grouse conservation measures in A Report on National Greater Sage grouse Conservation Measures (NTT-~~

n/a

n/a

Use WO response for why IM is not considered rulemaking and doesn't need to undergo NEPA analysis.

**Matt will provide to CAG**

**OUT OF SCOPE. DELETE FROM REPORT.**

Explanation to ID: this is outside of BLM's control. It's a USFWS process and BLM has no influence on it at all. Therefore, do not address in the report.

NCT agrees that the bullet point planning criteria is sufficient to respond to the issue of consideration of Man. 6840. Delete the NOTE TO BLM (not needed)

The second part of the issue statement ("formation of alternatives based on the NTT...") can simply be cross referenced back to Section 7.1 where the response is more focused on this topic. No need to repeat wording here.

Keep response for the IM issue here, but delete your language and use WO provided language (see red text).

Plan	Issue Statement
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OR

Some commenters felt that existing regulations are adequate to protect greater sage-grouse, while others felt that the alternatives in the DEIS/LUPA are inadequate. Commenters proposed revisions or requested additional details and clarifications to the alternatives related to greater sage-grouse. Topics of concern included:

- Invasive plant treatments
- Conifer encroachment
- Wildland fire
- Goals for the alternatives
- Disturbance cap
- Candidate Conservation Agreements (with Assurances)
- Habitat connectivity [Note to BLM: Don't forget about this one as it does not fit closely with any one resource; add info about connectivity habitat mapping and analysis.]
- ACEC mapping and management
- Fences

Commenters were also concerned about greater sage-grouse habitat mapping, including the scale of the map, lack of field

UT 1/2 Commenters provided specific recommendations to meet the COT report objectives. Commenters had specific issues with the range of management actions specific to GRSG:

- The need for changes or additions to the existing alternatives and maps, such as the noise level considerations, requirements for review by a GRSG implementation working group, and survey requirements.
- Management actions are arbitrary, without scientific backing. Commenters also suggested new literature that should be included in the alternatives.
- The BLM needs to provide more details on various aspects of the alternatives for clarification.
- The BLM considered an insufficient range of alternatives.
- The BLM needs to explain the scientific basis and methodology for its identification of preliminary priority management areas (“PPMA”) and preliminary general management areas (“PGMA”).
- Site-specific decisions (COAs) should be





ID-SW Commenters proposed revisions or  
MT requested additional details and clarifications to the alternatives related to GRSG. Topics of concern included:

- The size of lek buffers
- Level of predator control
- Need for and size of disturbance cap
- Restrictions on wind energy development
- Noise restrictions
- Livestock grazing management changes
- Inadequate description of adaptive management and monitoring
- Need for an improved definition of no net unmitigated loss
- Leasable mineral restrictions
- Juniper removal
- Existing and new fencing as they relate to sage-grouse strikes and mortality
- Lack of active habitat restoration
- Habitat monitoring

Commenters were concerned about greater sage-grouse habitat mapping, including suggesting clarifications or revisions to the habitat map and concerns about using the map for site-scale projects.

Commenters were also concerned that

NV-CA Commenters pointed out inconsistencies and suggested clarifications to the alternatives related to GRSG, including:

- Clarifying the definition of no unmitigated loss
- How maps would be revised over time
- Whether site-specific assessments would be conducted at the project level
- Adding more description to the No Action Alternative
- Framing the analysis according to threats rather than BLM and Forest Service programs

Commenters also questioned the accuracy and application of the maps and habitat mapping criteria. Commenters did not feel that management actions provided regulatory certainty.

NWCO Commenters had specific issues that they felt BLM should have considered in the range of management actions specific to sage grouse:

- BLM should add an Enhanced Mitigation/Expanded Use Authorization Program to the range of alternatives.
- BLM has failed to consider a full range of alternatives regarding the NSO buffer; they've only considered the 4-mile NSO buffer and need to consider other buffer distances.
- BLM should include a discussion/table that describes how the alternatives compare in protecting sage grouse. (done)
- BLM should include some incentives, including monetary compensation, to preserve grouse habitat on private lands.

Lewisto wn Commenters suggested changes to the alternatives related to GRSG, including:

- Consideration for Important Bird Area boundaries and areas outside of GRSG habitat
- Additional lek buffers
- Changes to grazing management
- Inclusion of a disturbance cap
- Inclusion of West Nile virus management measures
- Providing more regulatory certainty
- Including more guidance from the NTT report or public-proposed alternatives

ND 2/2 BLM should consider the following within the range of alternatives:

1. Sage-grouse Recovery Alternative as presented by conservation groups
2. 32dba limit at 0.25 miles from leks
3. Disturbance percentage, well density, and timing limits
4. Residual summer height of 18 cm to 10.2 inches throughout sage grouse nesting habitat during the nesting season
5. Recommendations from the North Dakota Game and Fish Department Sage Grouse Management Plan

Additionally, the BLM needs to clarify the range of management actions for protecting sage-grouse outside PH areas, including GH. Specifically, the BLM needs to clearly identify the merits of protecting and additional 80 acres of GH in Alternative C.

ND 2/2

WY9

## Response

The BLM and Forest Service do have existing laws, regulations, and guidance for special status species including greater sage-grouse. These are listed in Chapter I under Section I.XX, Preliminary Planning Criteria, and Section I.XX, Relationship to Other Policies, Plans, and Programs. While such relevant guidance does exist, the USFWS finding stated that “existing regulatory mechanisms are inadequate to protect the species. The absence of adequate regulatory mechanisms is a significant threat to the species, now and in the foreseeable future.” This planning process is intended to provide more specific, planning-level direction for land managers in order to conserve GRSG on a sub-regional scale and by providing regulatory mechanisms to further GRSG conservation.

As noted above in the response in Section 4.3, Range of Alternatives, and Section 2.3, Alternatives Development Process of the Draft EIS describes how the Oregon GRSG LUPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the LUPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office LUPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, and ~~or~~ to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions regarding other resources from the existing field office LUPs are acceptable and reasonable, and ~~therefore remain unchanged in this planning amendment.~~ ~~In these instances, there was no need to develop alternative management prescriptions.~~

As previously noted, the relative emphasis given to particular resources and resource uses differs across the alternatives to ensure consideration of the full spectrum of alternatives, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the six alternatives are described in Table 2-5, Summary Comparison of Resource Allocations in Greater Sage-Grouse Habitat, and in Section 2.9, Comparison of Alternatives, of the Draft EIS.

[Note to BLM: Address each bullet point above and state whether revisions to the EIS were made based on the comments



[BLM ACTION ITEM FOR FEIS: The alternatives development process does not appear to be well-described in the EIS. Consider including a section on alts development]

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable, and therefore remain unchanged in this planning amendment. ~~In these instances, there was no need to develop alternative management prescriptions.~~ The BLM considered the NTT report and incorporated applicable actions, per IM 2011-044, under Alternative B. The BLM considered a range of alternatives, see Section 2.8.3, Citizen Proposed Alternative in Alternatives Dismissed from Detailed Analysis, for rationale. Impacts on wintering GRSG and habitats is discussed in Section 4.2. Restoration of historical GRSG habitat is considered.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the five alternatives are described in Table 2.1, Description of Alternatives A, B, C1, C2, D, E1, and E2, in Section 2.7, Summary Comparison of Alternatives, of the Draft EIS.

Additionally, the BLM and the Forest Service used the best available scientific data, including recent sources such as the COT report, NTT report, and BER to develop management recommendations, strategies and regulatory guidelines to meet GRSG management objectives in the 2006 WAFWA Greater Sage-grouse Comprehensive Conservation Strategy. These documents

Several places throughout the EIS cite a wide range of scientific research that show the need for specific habitat requirements (at multiple spatial scales) and buffer distances proposed in the range of alternatives. Objectives and actions in Table 2.1 have been updated to identify the technical basis for requirements proposed in the alternatives. The Chapter 4 analysis (Section 4.2) has been modified to summarize the impacts and findings from scientific literature referenced. [BLM ACTION ITEM FOR FEIS (Renee): modify analysis sections with any new literature if appropriate] Comments related to requests for identifying specific vegetation cover and height were reviewed and considered. This level of specificity would be arbitrary given the wide range of variability in vegetation types and ecosystems in the planning area. Suggested guidelines will be taken into consideration but where site-specific science is not available, recommendations from best available science, such as those provided in Connelly et al. 2000 and Hagen et al. 2007 will be used. [NOTE TO BLM: Check this language.] Although there are existing disturbances, such as transmission lines, in occupied GRSG habitat, there is not research to suggest that transmissions lines are beneficial to GRSG. However best available science and anecdotal evidence does suggest that there can be adverse impacts from transmission lines [NOTE TO BLM (Renee): cite science]. Therefore new disturbance, including from new transmission lines, should be limited in important GRSG habitat. [BLM ACTION ITEM FOR FEIS (Renee): Add clarification to Ch4 regarding new disturbances in GRSG habitat.]

While the BLM does have the authority to do certain things under Manual 6840 to protect species, as stated in Section 1.2 of the Draft LUPA/Draft EIS, “this effort responds to the USFWS’s March 2010 “warranted, but precluded” ESA listing petition decision. Inadequacy of regulatory mechanisms was identified as a significant threat in the USFWS finding on the petition to list the GRSG. The USFWS identified the principal regulatory mechanisms for the BLM and the Forest Service as conservation measures embedded in LUPs. Changes in management of GRSG habitats are necessary to avoid the continued decline of populations that are anticipated across the species’ range. These plan amendments will focus on areas affected by threats to GRSG habitat identified by the USFWS in the March 2010 listing decision.” In other words, current management is not sufficient to protect the species from being listed as threatened or endangered under the ESA. Therefore the BLM and Forest Service must take additional steps and make additional decisions to protect the species.

Action MA-GRSG-8 (p. 2-38 of Draft LUPA/Draft EIS) has been updated to say “will not” instead of “should not”, as suggested by a commenter (Comment UTSG-14-0151-25). [BLM ACTION ITEM FOR FEIS: Make sure this is done in the alternatives matrix.]

As noted above in the response in Section 4.3, Range of Alternatives, Section 2.1 of the Draft EIS describes how the Idaho and southwestern Montana GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA and worked closely with the State with assistance from the US FWS . The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office LUPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions regarding other resources from the existing field office LUPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

As previously noted, the relative emphasis given to particular resources and resource uses differs, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the six alternatives are described in Table 2-2, Comparative Summary of Alternatives by Acres Allotted, and in Section 2.6, Detailed Description of Alternatives, of the Draft EIS.

Regarding the following issues:

The size of lek buffers -lek buffers will be revised in final plan/FEIS reflecting additional review of best science.

- Level of predator control
- Need for and size of disturbance cap- Additional specificity regarding the disturbance cap has been further explained in the FEIS.
- Restrictions on wind energy development
- Noise restrictions. Noise and seasonal stipulations for both construction and long-term implementation of land use activities has been included in the final EIS. [NOTE TO BLM (from Makela)- Project leads should discuss how to consistently address impacts from military flights and firm up discussion at 4-15. Consider adding additional detail from Mt. Home AFB Integrated Resource Mgt. Plan.]

As noted above in the response in Section 4.3, Range of Alternatives, Section 2.3 of the Draft EIS describes how the Nevada and Northeastern California GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in individual field office and forest LUPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from individual field office and forest LUPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. As stated in the DEIS (last paragraph pg. 3-9), the habitat objectives were developed based on current research conducted within the Great Basin sagebrush type, as opposed to sagebrush-steppe vegetation types, and is specific to the Nevada and Northeastern California Sub-region within the LUPA/EIS project boundary. GRSG Habitat Objectives (Table 2-6) does not include residual vegetation heights. Current management, (Alt. A) does include grass height based on Connelly et al. 2000. However, the GRSG LUPA/DEIS has revised GRSG habitat objectives based on local and recent work by Coates et al. 2011 and Coates and Delehanty 2010. These studies have documented successful nesting at sites with greater or equal to 10% of residual and live perennial grass cover. The commenter's interpretation of Hausleitner et al (2005) research was inaccurate and does not meet the definition of best available science. The authors noted that: "Managers must be cautious in measuring grass cover and height at any time during incubation. These results represent a single year of sampling and need to be verified under different climatic conditions and geographical locations within GRSG range."

The rationale to designate PGH to PPH after a fire is based on the best available science discussed below. In addition, due to BLM/FS Emergency Stabilization and Rehabilitation (ES&R) efforts after a wildfire it is essential to elevate PGH adjacent to a wildfire to PPH while ES&R treatments are given the opportunity to recover. The most effective strategy to stabilize or recover GRSG populations is to protect existing habitat (Stiver et al. 2006). Areas of high biological value combined with low anthropogenic disturbances represent regions where conservation actions can be immediately implemented (Doherty et al. 2011).

"Emergency actions" and BLM's need to respond to drought is covered by the Nevada Drought Handbook (NVH-1730-1)

As noted above in the response in Section 4.3, Range of Alternatives, Section 2.3 of the Draft EIS describes how the Northwest Colorado GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the four alternatives are described in Table 2-2, Comparative Summary of Alternatives, in Section 2.8, Summary Comparison of Alternatives, of the Draft EIS.

Additionally, the 4-mile buffer for GrSG habitat protection is supported and was derived from research performed by several noted sage-grouse scientists including Holloran 2005, Walker et al. 2007, Tack 2009, Johnson et al. 2011. For example, from the NTT report: "Impacts as measured by the number of males attending leks are most severe near the lek, remain discernible out to >4 miles (Holloran 2005, Walker et al. 2007, Tack 2009, Johnson et al. 2011), and often result in lek extirpations (Holloran 2005, Walker et al. 2007). Negative effects of well surface occupancy were apparent out to 3.1 miles, the largest radius investigated, in 2 of 7 study areas in Wyoming (Harju et al. 2010). Curvilinear relationships show that lek counts decreased with distance to the nearest active drilling rig, producing well, or main haul road and that development within 3 to 4 miles of leks decrease counts of displaying males (Holloran 2005).

All well-supported models in Walker et al. (2007) indicate a strong negative effect, estimated as proportion of development within either 0.5 miles or 2 miles, on lek persistence. A model with development at 4 miles had less support, but the regression coefficient indicated that negative impacts within 4 miles were still apparent. Two additional studies reported negative impacts apparent out to 8 miles on large lek occurrence (>25 males; Tack 2009) and out to 11.7 miles on lek trends

Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

- Consideration for Important Bird Area boundaries and areas outside of GRSG habitat
- Additional lek buffers
- Changes to grazing management
- Inclusion of a disturbance cap
- Inclusion of West Nile virus management measures:

~~Despite concerns over impacts of the West Nile virus on sage grouse, actual prevalence of the virus in wild populations remains unknown (Walker et al. 2007). The impacts of the virus on Sage grouse in the future will depend on temperature, rainfall, and changes in vector distribution. Temperature strongly affects physiological and ecological processes that influence West Nile virus transmission, and outbreaks are typically associated with prolonged periods of above-average temperature and drought (Walker et al. 2007). Due to the climate of the planning area, the spread of the West Nile virus and impacts to sage grouse in the planning area are speculative at this time and, therefore, was not included in the scope of the cumulative impact analysis in the PRMPA/FEIS. The BLM understands the potential threat to greater sage grouse from the West Nile virus. To prevent the spread of the West Nile virus, the DRMPA/EIS specifically addresses management of water disposal pits (Section 4.17.7).~~

B.L. Walker, David E. Naugle, Kevin E. Doherty, And Todd E. Cornish. 2007. West Nile Virus And Greater Sage Grouse: Estimating Infection Rate In A Wild Bird Population. Avian Diseases Digest Sep 2007 : Vol. 2, Issue 3, Pg(S) E14 E14 Doi: 10.1637/1933-5334(2007)2[E14:Wnvags]2.0.Co;2

As noted above in the response in Section 4.3, Range of Alternatives, Section 2.3 of the DRMPA/DEIS describes how the North Dakota GRSG RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this DRMPA/DEIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the 1988 North Dakota RMP and ROD, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the 1988 North Dakota RMP and ROD are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the four alternatives are described in Table 2-2, Comparative Summary of Alternatives, in Section 2.10, Summary Comparison of Alternatives, of the DRMPA/DEIS.

I. During scoping for the North Dakota Greater Sage-Grouse RMPA/EIS, individuals and conservation groups submitted management direction recommendations, including the Sage-grouse Recovery Alternative, for protection and conservation of GRSG and their habitat. The recommendations received during scoping, in conjunction with resource allocation opportunities and internal sub-regional BLM input, were reviewed to develop the management direction for GRSG under Alternative C. Conservation measures in the alternative are focused on both PH and GH. These areas have been identified by NDGFD and USFWS in coordination with BLM.

The BLM acknowledges that there could be a large number of variations to alternatives put forth in the RMPA process. However, the BLM is not required to analyze in detail each unique variation, including those variations determined not to meet the RMP's purpose and need or those determined to be unreasonable given BLM mandates, policies, and programs including the FLPMA and other Federal laws and regulations applicable to public lands. The CEQ states that when there are potentially a very large number of alternatives only a reasonable number of examples covering the full spectrum of alternatives must be analyzed and compared in the EIS (Forty Most Asked Questions Concerning CEQ's NEPA Regulations).

3. [John Carlson to provide direction related to disturbance percentage.] Because the action alternatives make unleased areas either No Lease or No Surface Occupancy, setting well density parameters in unleased areas would not apply. The impacts of well densities are disclosed in Table 4-6 in the DEIS. Since most of the high development potential has already been leased, and due to the small amount of BLM minerals in the planning area, the surface disturbance and well densities do not change significantly among the alternatives (even between the alternatives that have no lease vs. the no-action. Alternatives Ba and C would apply a seasonal restriction on exploratory drilling that prohibits surface-disturbing activities during the nesting and early brood-rearing season in all PH during this period.

4. As stated in the DEIS on page 2-29, under Alternative D the BLM would conduct land health assessments in PH that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving GRSG habitat objectives. Local objectives would be developed at the field office level in partnership with NDGFD and USFWS, and incorporated into AMPs or livestock grazing permits as appropriate incorporating best available science. Residual summer height requirements would be incorporated during these rangeland health assessments.

5. As stated in on page 1-19 in Section 1.8.8 of the DEIS, the purpose and need for the North Dakota Greater Sage-Grouse RMPA/EIS is consistent with the goal of the Management Plan and Conservation Strategies for Greater Sage-Grouse in North Dakota, which is to provide for long-term conservation and enhancement of sagebrush steppe/mixed-grass prairie habitats in North Dakota in a manner that will support a self-sustaining GRSG population, a diversity and abundance of other wildlife species, and human uses. Additionally, the North Dakota Game and Fish Department is a cooperating agency for the DEIS and they contributed to the development of the range of alternatives.

As described in Section 2.4.5 of the DRMPA/DEIS, the conservation measures under Alternative B are focused on PH (32,900 acres), and measures under Alternative C are focused on both PH and GH (32,980 acres). The BLM acknowledges that there is only 80 acres of BLM-administered land delineated as GH. However, as indicated in Table 2-2, Alternative D would apply conservation measures for mineral resources on split-estate lands. These measures would protect GH on non-BLM-administered lands (e.g., over 5,000 acres of unleased fluid mineral estate; approximately 80,000 acres of coal resources; and approximately 50,000 acres of solid minerals). In addition to specific management actions being applied to both PH and GH under Alternative C, the biological benefits to sage-grouse are greater under Alternative C because of the implementation of stricter management actions. For example, Alternative C would not site wind energy developments in PH



Use provided language in red text for issue re: existing regs adequate for protecting sg

Also cross reference back to Tab/Section 4.3 regarding NEPA requirements for appropriate/adequate range of alts language.

Recommend that the response stick to the range of alternative issue and don't address the individual bullet points. If these topics of concern are included in responses of the relevant sections, reference the reader to the other sections. E.g., fire alternative actions can be found in Section 12, Fire, for details.

For language regarding how COT was used in EIS and ties into alt development/review, reference response in section/tab 7.3, as well as response for NTT use in alts in section/tab 7.1. Don't need to duplicate language here.

Not clear why the response focuses on scientific uncertainty? This isn't part of the issue statement, so why covered in detail in the response?

1) range of alts are adequate. reference back to 4.3 for details. Implementation requirements (working group review & survey requirements) = this action is at the planning level analysis & actions, not implementation.

2) regarding scientific backing, reference the reader to sections 7.1 (NTT) and 7.3 (COT), and appropriate section in the EIS for how alts were developed

3) see direction in point 1) above.



Also cross reference back to Tab/Section 4.3 regarding NEPA requirements for appropriate/adequate range of alts language.

Recommend that the response stick to the range of alternative issue and don't address the individual bullet points. If these topics of concern are included in responses of the relevant sections, reference the reader to the other sections. E.g., fire alternative actions can be found in Section 12, Fire, for details.

For 6840 reference, cite back to planning criteria (included in general "BLM will follow laws, regs, etc." bullet)



include a cross reference to section 7.9 for details related to the mitigation plan. Also include reference to appendix that will be mit, monitoring, and AM info in the FEIS.

Also cross reference back to Tab/Section 4.3 regarding NEPA requirements for appropriate/adequate range of alts language.

also reference back to NTT & COT responses for info on how these info was incorporated into alts.

Recommend that the response stick to the range of alternative issue and don't address the individual bullet points. If these topics of concern are included in responses of the relevant sections, reference the reader to the other sections. E.g., fire alternative actions can be found in Section 12, Fire, for details.

Plan	Issue Statement
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OR	<p>Commenters suggested new or additional literature for the BLM to consider in the DEIS/LUPA. In addition, commenters questioned the accuracy and adequacy of information in the DEIS/LUPA. Topics of concern included:</p> <ul style="list-style-type: none"><li>• Accuracy of habitat mapping</li><li>• Effects of livestock grazing, roads, noise, and infrastructure</li><li>• Accuracy of greater sage-grouse population and habitat condition estimates.</li><li>• Wildland fire management</li><li>• West Nile virus</li></ul>
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UT 1/2 Commenters provided several references and studies that the BLM and Forest Service did not consider in the EIS but should include or consider in the EIS. Also, commenters questioned the accuracy and validity of the NTT Report.



ID-SW Commenters suggested new or additional  
MT literature for the BLM and Forest Service to consider in the DLUPA/EIS related to:

- Determination of GRSG population size and trends – inaccuracy of past counts; insufficient data to determine trend.
- Effects of livestock grazing, predation, drought, noise, and anthropogenic development
- Appropriate lek buffers and disturbance cap to incorporate
- Mitigation
- Hunting– outside scope but managed via the Idaho and Montana state plans
- GRSG habitat requirements
- Accuracy of the habitat mapping
- Infrastructure
- West Nile virus

NV-CA 1/6 Commenters suggested new or additional literature for the BLM and Forest Service to consider and suggested re-interpretations of some of the literature cited in the DLUPA/EIS. Topics commenters were concerned about include:

- Predation and perch discouragers
- Greater sage-grouse habitat requirements
- Noise
- Use of Rangeland Health Assessments
- Disease
- Hunting
- Monitoring protocol
- How population size is measured
- Impacts from mineral development and grazing

Commenters were also concerned about greater sage-grouse habitat mapping, including:

- How and when to update the habitat map on a site-specific basis
- Use of updated maps in the Nevada Conservation Plan
- Map accuracy
- Caution against site-specific use

NV-CA

2/6

NV-CA

3/6

NV-CA

4/6

NV-CA  
5/6

NV-CA  
6/6



NWCO Commenters provided several references  
1/2 and studies that BLM did not consider in the  
EIS but should include or consider in the EIS.  
Also, commenters questioned the accuracy  
and validity of the NTT Report.

NWCO  
2/2

Lewisto wn Commenters suggested new or additional literature for the BLM to consider in the FEIS. Topics commenters were concerned about include impacts from:

- Grazing Disturbance, including stubble height requirements
- Energy development and disease
- Transmission lines
- Noise

Commenters noted inaccuracies in the EIS or requested additional information

Commenters were also concerned about GRSG habitat mapping, including suggesting clarifications or revisions to the habitat map and questioning how the map will be updated.

ND The DRMPA/DEIS does not include current and accurate sage-grouse population data and does not consider the adjacent Montana sage-grouse population. The DRMPA/DEIS failed to include a detailed description of the current land and acoustic disturbance in the planning area. The DRMPA/DEIS failed to map and present GRSG wintering habitat as part of the baseline requirement.

WY9

## Response

The BLM used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013), NTT report (NTT 2011), and COT report (USFWS 2013).

Additionally, the BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, ODFW, scientific literature, field and district office data, and [list other sources]. Considerations included but were not limited to [list the types of data or GIS layers that were gathered/used].

As a result of these actions, the BLM gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (Chapter 4). As a result, the BLM has taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DLUPA/EIS to enable the decision maker to make an informed decision. Finally, the BLM has made a reasonable effort to collect and analyze all available data.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13). The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.

Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...

[NOTE TO BLM: If the information is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where.]

[Note: Would be good to have a summary explanation of the scientific background of the disturbance cap that is the same

Before beginning the Utah Sage grouse EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

~~The BLM and the Forest Service used the most recent and best information available that was relevant to a land use planning level analysis including the COT report, NTT report, the GRSG Monograph, and Baseline Environmental Report (BER; Manier et al. 2013) to develop management recommendations, strategies and regulatory guidelines to meet GRSG management objectives in the 2006 WAFWA Greater Sage grouse Comprehensive Conservation Strategy. These documents were based on recent, published, and peer reviewed scientific data developed by an interdisciplinary team of federal and state scientists and resource managers. Scientific uncertainty was addressed in these documents, particularly in the BER [NOTE TO BLM: Is this true?]. Uncertainty can relate to the spectrum of conclusions regarding impacts, variability of species requirements across habitats, and opposing viewpoints. The BLM and Forest Service also incorporated information from scientific literature not included in the above recommendations (e.g., science regarding noise, tall structures, and roads).~~

~~The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives. [NOTE TO BLM: Is this true?]~~

~~As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (see Chapter 4, Environmental Consequences). As a result, the BLM and the Forest Service have taken a "hard look," as required by the NEPA, at the environmental consequences of the alternatives in the DLUPA/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data.~~

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-I, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM and the Forest Service will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, etc. [NOTE TO BLM: List others as applicable] The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.~~

~~Of the suggested studies and references put forth by the commenters, the BLM and Forest Service reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...~~ [ACTION BLM: need to insert results from new data review]

[ACTION BLM (Renee): Need to cite all statements...]

[ACTION BLM: If the information is essentially the same, then state this. If there were references that you determined were

~~{Recommend deleting this paragraph: Before beginning the Idaho and Southwestern Montana Sage grouse LUPA/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan level. The data needed to support broad scale analysis of the planning area are substantially different than the data needed to support site specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning}.~~

The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning level analysis including the Baseline Environmental Report (BER; Manier et al. 2013), NTT report (NTT 2011), and COT report (USFWS 2013). Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, Idaho Department of Fish and Game, scientific literature, field and district office data, and [list other sources]. Considerations included but were not limited to [list the types of data or GIS layers that were gathered/used].

~~As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (Chapter 4). As a result, the BLM and the Forest Service have taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DLUPA/EIS to enable the decision maker to make an informed decision. Finally, the BLM and the Forest Service have made a reasonable effort to collect and analyze all available data.~~

A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM and the Forest Service will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate

A description of the habitat mapping process is presented in Section xx. [BLM: Include description of how the map was created and why it is accurate/appropriate]. The revised mapping process developed by USGS is described as follows: ~~The USGS Western Ecological Research Center (WERC) developed a Greater Sage Grouse habitat map based on a generalized linear mixed model approach in the Nevada and Northeastern California Sub-region. The mapping process is a data driven approach that uses existing GRSG telemetry locations and mapping products as multiple environmental factors to model the probability of GRSG occurrence throughout the sub-region. This process results in resource selection functions that are used to create a habitat suitability index and predict the relative importance of all areas, even those where data are lacking. These methods have been accepted in the peer reviewed scientific literature and have been shown to be valuable for identifying areas meaningful to GRSG populations. (Citation: Peter Coates; U. S. Geological Survey, Western Ecological Research Center)~~

Before beginning the Nevada and Northeastern California Sage grouse LUPA/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013 ), NTT report (NTT 2011), and COT report (USFWS 2013). Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service [Nevada Department of Wildlife, California Department of Wildlife and USGS]. Considerations included but were not limited to [male lek attendance data, telemetry data, vegetation data, fire history, etc. A few examples: threatened and endangered species and their habitats, water quality- limited (303d) streams, deer and elk herd management areas, invasive plants, and uses on State lands]. As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (Chapters 4 and 5). As a result, the BLM and the



[NOTE TO BLM: If the information is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where.] BLM clarifies that the results from Nonne et al. 2013 were not labeled as final results, and should not be called such. This report documented the completion of the 10-year field component of the study and was intended to highlight preliminary results at that time and to present the results to cooperators. None of the results should be considered final (including those reported in Gibson et al. 2013) until they have undergone a formal peer review as part of the publication process. The authors acknowledge that they should have been clearer in pointing this out in previous drafts of their progress reports. The discrepancy between the reported results in Nonne et al. (2013) and Gibson et al. (2013) stem from an improvement in the researchers ability to account for spatial and temporal heterogeneity among GRSG individuals. Their earlier progress reports attempted to assess the influence of transmission lines on various demographic rates by considering the effect of the transmission line as a distance-based variable, in which heterogeneity among individuals through space and time that was not associated with the transmission line is accounted for with environmental covariates as additive effects. Although these methods are still widely used (DeGregorio et al. 2014, Lebeau et al. 2014, McNew et al. 2014), they assume that the variable in question affects all individuals that are a similar distance from the source equally, regardless of other potentially confounding factors, such as individual quality or habitat suitability. It is possible to model interactions between covariates to account for this potential confounding variation, however as model complexity increases, covariate interactions may become difficult to interpret and can be sensitive to sparse or outlier data. In Gibson et al. (2013), the authors developed alternative methods that were able to more appropriately account for these potential sources of heterogeneity related to variable environmental conditions. They predicted demographic rates at the individual level in the absence of a transmission line effect, and then assessed whether the realized demographic rates of these individuals deviated from prediction based on their distance from the transmission line. For example, if a female's individual characteristics and the habitat surrounding her nest site suggested she should have a high probability of success, was her realized nest survival rate lower than expected because she was located closer to the transmission line.

After appropriately accounting the differences among GRSG individuals, the researchers found that support for an effect of distance from the transmission line on GRSG demographics was variable across demographic rates. Distance from transmission line was not associated with variation in nesting propensity, nor was it supported to influence male lek

The Holechek documents relate to setting stocking rates, evaluating grazing intensity, etc. and emphasize conservative stocking to maintain rangeland productivity and multiple use. We need to remember that the #1 GRS objective in Table 2.6 (General) is to meet ALL rangeland health standards. Nevada (and California I assume) has upland health standards for each geographic area. The Holechek docs would most directly address situations where we are not meeting the upland health standard due to unacceptable patterns or levels of use. We made sure we included that "Objective" because Nevada specific research seemed to emphasize sagebrush canopy cover as opposed to herbaceous cover especially as related to nesting success. The team that worked on Table 2.6 was concerned that some would argue that you did not need herbaceous cover in Nevada, hence the inclusion of the "General" objective. We could summarize this part of Mike's response to state that Holecheck was not used or referenced because it discusses site specific/project level analysis which requires additional NEPA analysis (Environmental Assessments) at the Field Office level. This analysis would include a Rangeland Health Assessment (Table 2.6) for individual allotments and if it is determined that the allotment is not meeting Rangeland Health Standards and grazing is identified as the casual factor, it would trigger changes in grazing management which could include a change in stocking rates, utilization, season of use, duration, etc. In addition, herbaceous stubble height was the accepted "norm" based on Connelly & Braun and others. However, the NV/CA DLUPA/EIS has revised GRS habitat objectives based on local and recent work by Coates et al. 2011 and Coates and Delchanty 2010. In the USFWS 2010 Listing Decision (75 Federal Register. 13910), the USFWS stated "Based on the best scientific and commercial information available, we conclude that predation is not a significant threat to the species such that the species requires listing under the Act as threatened or endangered." The USFWS acknowledged that increasing patterns of landscape fragmentation are likely contributing to increased predation on the species and identified two areas where predators may be limiting GRS populations because of intense habitat alteration and fragmentation. One of the two areas identified is within the Nevada and Northeastern Sub region in Northeastern Nevada. Greater GRS are susceptible to predation from egg to adult, leading to the hypothesis that predator control would be an effective conservation tool for GRS populations. Generally, GRS nest success and adult survival are high; suggesting that on average predation is not a limiting factor to GRS populations. GRS face a suite of predators in sagebrush communities, however, none of the predators specialize in GRS (Hagen 2011, p 95-100). Predator management research has not provided sufficient evidence to support implementation of predator control to

A recent predator study was conducted by Lockyer et al. (2013) in the Virginia Mountains of Northeastern Nevada within the Great Basin. This study revealed that common ravens accounted for 46.7% of nest depredations within the study area. However, Lockyer et al. clearly stated that this study was not representative of the entire Great Basin for two main reasons. The first was due to significantly lower GRSG cumulative nest survival rates, which were documented at 22.4% within the study area. This survival rate is significantly lower than other published results for GRSG in the Great Basin. Secondly, the study area is not representative of the entire Great Basin or of the NV/CA sub-region due to increased anthropogenic disturbances. Anthropogenic disturbances and raven abundance is positively associated with human caused habitat alterations.

Citations:

Hagen, C.A. 2011. Predation on Greater Sage Grouse: facts, process and effects. Pp 95-100

In S.T. Knick and J.W. Connelly (editors). Greater Sage Grouse: ecology and conservation of a landscape species and its habitat. Studies in Avian Biology (vol. 28), University of California Press, Berkeley, CA

USFWS Service 2010 Listing Decision (75 Federal Register. 13910)

Schroeder, M.A., and R.K. Baydack. 2001. Predation and the management of prairie grouse. Wildlife Society Bulletin 29:24-32.

Lockyer Z.B., Coates P.S., Casazza M.L., Espinosa S., Delehanty D.J. 2013. Greater sage grouse nest predators in the Virginia Mountains of northwestern Nevada. Journal of Fish and Wildlife Management 4(2):242-254; e1944-687X.

doi:10.3996/122012-JFWM-110R1

Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the DLUPA/ EIS, or if the references provided the same information as already used or described in the DLUPA/ EIS.

The BLM determined that attempts to assess the influence transmission lines on various demographic rates by considering the effect of the transmission line as a distance based variable do not always include the effect of covariates. For example, heterogeneity among GRSG individuals through space and time which is associated with the transmission line is not always accounted for with environmental covariates as additive effects. Although these methods are still widely used (DeGregorio

- Central Montana research focuses on more mesic sagebrush steppe habitat types, as opposed to NV/CA specific.
- Connelly, et al focuses on sage grouse habitat across their distribution and includes areas within Idaho and Montana.
- GRSB Habitat Objectives (Table 2-6) do not include residual vegetation heights. Current management (Alt. A) does include grass height based on Connelly et al. 2004. The GRSB DEIS has revised GRSB habitat objectives based on local and recent work by Coates et al. 2011 and Coates and Delehanty 2010. These studies have documented successful nesting at sites with greater or equal to 10% of residual and live perennial grass cover.

Though threats such as diseases may be significant at a localized level, particularly if habitat quantity and quality is compromised (COT 2013), West Nile Virus was not identified by USFWS in their 2010 Listing Decision as a significant threat to GRSB within the NV/CA Sub region. The LUPA/DEIS specifically addresses the significant threats addressed by USFWS. The studies that were cited/discussed by the commenter were specific to areas of oil and gas development in MT, WY, etc. and are not representative of the NV/CA Sub region.

Despite concerns over impacts of the West Nile virus (WNV) on GRSB populations, actual prevalence of the virus in wild populations remains unknown (Walker et al. 2007). Although the WNV has been documented in Nevada and California (1 detection in each state, within the Bi-State population outside of the NV/CA Sub region), the impacts of the WNV on GRSB in the future will depend on temperature, rainfall, and changes in vector distribution. Temperature strongly affects physiological and ecological processes that influence WNV transmission, and outbreaks are typically associated with prolonged periods of above average temperature and drought (Walker et al. 2007). Due to the climate of the planning area, the spread of the WNV and impacts to GRSB in the planning area are speculative at this time and, therefore, was not included in the scope of the cumulative impact analysis in the DLUPA/EIS. The USFWS also concluded that, “at this time, we find that neither disease nor predation is a sufficiently significant threat to GRSB now or in the foreseeable future that it requires listing under the Act as threatened or endangered based on this factor (USFWS 2010).

The BLM understands the potential threat to GRSB from the WNV and has made reference to it in the DEIS under the Impact Analysis for GRSB and GRSB Habitat (Section 4.3; 4.3.2; 4.3.5; 4.3.6; 4.3.9), Riparian Areas and Wetlands (Section 4.5.5) and Water Resources (Section 4.16.2 and 4.16.3). Additionally, development of artificial ponds can increase the likelihood of the creation of pools of standing water, which can serve as mosquito breeding habitat, increasing the ability for WNV to spread into landscapes otherwise not at risk to the pathogen (USFWS 2010). To prevent the spread of the WNV, As stated in the DEIS (last paragraph pg. 3-9), the habitat objectives were developed based on current research conducted within the Great Basin sagebrush type, as opposed to sagebrush steppe vegetation types, and is specific to the Nevada and Northeastern California Sub region within the LUPA/EIS project boundary. GRSB Habitat Objectives (Table 2-6) does not include residual vegetation heights. Current management, (Alt. A) does include grass height based on Connelly et al. 2000. However, the GRSB LUPA/DEIS has revised GRSB habitat objectives based on local and recent work by Coates et al. 2011 and Coates and Delehanty 2010. These studies have documented successful nesting at sites with greater or equal to 10% of residual and live perennial grass cover. The commenter’s interpretation of Hausleitner et al (2005) research was inaccurate and does not meet the definition of best available science. The authors noted that: “Managers must be cautious in measuring grass cover and height at any time during incubation. These results represent a single year of sampling and need to be verified under different climatic conditions and geographical locations within GRSB range.”

Before beginning the Northwest Colorado Sage grouse EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.

[NOTE TO BLM: Placeholder for possible national response that addresses how opposing science was addressed in the process, and uncertainties associated with the approaches or the science used. E.g., Uncertainty was addressed by analyzing several alternatives that that incorporated varying levels of protection for the species. Opposing science was largely reviewed/addressed in documents such as the BER. The BER was specifically developed to review the best available science relative to Greater Sage-Grouse, habitat requirements, threats, etc., as well as depict spatial information on where threats are germane. It is a comprehensive document that summarizes the literature, and many of the citations provided by commenters are included in that assessment. In the final, it might be a good idea to have a specific section for these issues.] This information is discussed in the FEIS in Sections XX, XX, and XX.

Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service, Colorado Parks and Wildlife (CPW), Office of Surface A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, site specific analysis of land use authorizations, and lease sales. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions. Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...

Before beginning the Lewistown Field Office Greater Sage-Grouse RMPA/EIS and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The RMPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

The BLM used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013), NTT report (NTT 2011), and COT report (USFWS 2013). Additionally, the BLM consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the USFWS and [list state agencies, including state wildlife agency]. Considerations included but were not limited to [list the types of data or GIS layers that were gathered/used. A few examples: threatened and endangered species and their habitats, water quality- limited (303d) streams, deer and elk herd management areas, invasive plants, and uses on State lands].

As a result of these actions, the BLM gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMPA/DEIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (Chapter 4). As a result, the BLM has taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DRMPA/DEIS to enable the decision maker to make an informed decision. Finally, the BLM has made a reasonable effort to collect and analyze all available data.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13). The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public

As noted above in the response in Section 4.5, GIS Data and Analysis, the habitat delineations were created by the BLM and USFWS in collaboration with NDGFD who is responsible for managing and monitoring GRSG populations. Based on the Baseline Environmental Report and other recent, published, and peer-reviewed scientific data, and in cooperation with the NDGFD, the BLM created the Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH) areas. Section 3.3.1, Conditions of the Planning Area, describes the existing conditions of leks and GRSG on all land ownerships in the planning area. Sections 3.3.2, Conditions on BLM-Administered Lands, describes the conditions of leks and GRSG on BLM-administered lands in the planning area.

As described in Section 1.3, the North Dakota Greater Sage-Grouse RMPA/DEIS amendment only provides management direction for the BLM North Dakota Field Office. The planning area for the North Dakota Greater Sage-Grouse RMPA/EIS is composed of BLM-administered lands, US Department of Agriculture (USDA), Forest Service (Forest Service) lands, State of North Dakota lands, USFWS-managed lands, and private lands within the North Dakota Field Office. The description of the existing conditions in the DEIS and the analysis of direct impacts only includes the lands within the planning area (North Dakota Field Office). The Miles City Field Office is currently revising their RMP. The analysis in the Miles City RMP revision will address the impacts to the Montana portion of the GRSG population in WAFWA Management Zone I. However, as stated in Section 5.2.1, the cumulative effects analysis study area for GRSG extends beyond the planning area boundary and consists of WAFWA Sage-Grouse MZ I, which includes the Montana portion of the population.

NOTE TO BLM: The “DRMPA/DEIS failed to include a detailed description of the current land and acoustic disturbance in the planning area” portion of the issue summary should get a response to. [John Carlson to provide direction]

For the North Dakota Greater Sage-Grouse RMPA/EIS, areas identified as having the highest conservation value to maintaining sustainable GRSG populations were designated as PH. These areas would include breeding, late brood-rearing,

Cite reference to section/tab 4.4 for general language associated with NEPA requirements of baseline info and definition of best available info. No need to repeat it here.

Recommend that the response stick to the baseline/best available issue and don't address the individual bullet points. If these topics of concern are included in responses of the relevant sections, reference the reader to the other sections. E.g., fire alternative actions can be found in Section 12, Fire, for details.

Stock language for findings from review of the literature from commenters is coming -



Cite reference to section/tab 4.4 for general language associated with NEPA requirements of baseline info and definition of best available info. No need to repeat it here. Same goes for the NTT info (section 7.1)

Stock language for findings from review of the literature from commenters is coming - insert it when provided by NCT.

There's a disconnect between the points in the summary statement and the points that the response is hitting on. Suggest deleting the parts that are irrelevant or revising the issue statement to better reflect the points covered



TMI - keep it to the stock  
language for review of  
relevant info.

Makela note: deleted from  
here. Sounds like  
implementation level  
activities and all part of the  
FIAT work.

cross ref back to NEPA 4.4  
response for general  
requirements.

Cross ref to other  
sections as needed.

Include stock language for  
findings of lit review (to be  
provided)











also include reference back  
to the NTT response 7.1

delete the stuff about BER.

Also include reference  
back to general NEPA best  
available discussion, 4.4

include references to  
other sections as needed  
(e.g., reference section 16  
for the grazing issue)

Plan	Issue Statement
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OR Commenters provided suggestions on how to improve or modify the impact analysis ~~for~~ on greater sage-grouse ~~from other actions in~~ several ~~topic areas~~ including:

- Disturbance cap
- Hunting
- Livestock grazing
- Wild horses and burros
- Recreation
- Infrastructure
- West Nile virus

UT BLM should revise some of their assumptions, including the assumption that the analysis did not include historic or potential habitat. The DLUPA/DEIS fails to adequately analyze the impacts ~~to~~ on sage-grouse and its habitat from other wildlife, infrastructure, grazing travel. The DLUPA fails to accurately describe the nature and type of effects to GRSG and their habitat from existing resource uses and activities. The DLUPA/DEIS fails to analyze the effectiveness of current rangeland health standards, The BLM and Forest Service did not do enough analysis of impacts to GRSG outside PH and GH. The DLUPA/DEIS is not consistent in its evaluation of indirect impacts associated with various disturbances. The thresholds concept is not adequately analyzed.

The BLM did not do enough analysis for actions in the Priority Habitat areas.

The DEIS fails to analyze the impacts to GRSG from hunting.

ID-SW MT 1/2 The BLM and Forest Service should conduct additional, more comprehensive analysis of the impacts on greater sage-grouse to provide more substantiated conclusions. Commenters provided suggestions on how to improve or modify the impact analysis for greater sage-grouse in several topic areas including:

- Hunting
- Predation
- Anthropogenic disturbance, disturbance caps, and lek buffers
- Expanding on beneficial effects on GRSG from range improvements
- Greater sage-grouse population size and trend
- Livestock grazing, fences, and trailing
- Noise as related to low-level military overflights
- Success of habitat improvement projects
- Prescribed fire
- Herbicides
- West Nile virus
- More detailed analysis of Alternative A
- Climate change
- Need to identify areas for restoration

ID-SW  
MT 2/2

NV-CA Summary Statement 1

1/2 Commenters pointed out conflicts between GRSG and resource use management that would have negative impacts on GRSG, including livestock grazing, wild horses and burros, and hunting.

Summary Statement 2

Commenters provided suggestions on how to improve or strengthen the impact analysis for greater sage-grouse in several areas including:

- Improving the summary of the effects of conservation measures
- Increasing the geographic area of the effects analysis
- Impacts from conversion of private lands
- Fire
- Minerals and the relation to disturbance caps/no unmitigated loss
- Lek buffers
- Roads
- Noise
- Fences
- Providing a more detailed analysis of Alternative A

NV-CA [Note to BLM: Suggest considering changes  
2/2 to the DEIS based on the following comment  
numbers:

- 0087-1: Summary of conservation measures
- 0109-3: Conversion of private lands
- 0116-9: Fire and GRSG habitat
- 0285-17: Impacts of minerals, no unmitigated loss/disturbance cap, adequacy of lek buffers, impacts from roads, noise, fences
- 0285-34: deficiencies in Alternative E; impacts from fire breaks
- 0381-2: Improve Alternative A analysis]

[Note to BLM from MZ: In general, I think letter 0285 was incorrectly coded and that too much text from that letter was coded under 7.7. EMPSi will need to re-look at this.]



NWCO BLM should revise some of their assumptions, including the assumption that the analysis did not include historic or potential habitat. Also, the BLM did not do enough analysis for actions in the Priority Habitat areas.

Lewisto  
wn Commenters provided suggestions on how to improve or strengthen the impact analysis for GRSG in several areas including:

- GRSG impact indicators
- Analysis of Alternative A
- Roads associated with livestock grazing
- Vertical structures
- Fences
- Impacts from livestock as compared to native ungulates
- Consideration for impacts outside GRSG habitat and ACECs.

ND 1/2 The DRMPA/DEIS fails to adequately illustrate how conservation measures for infrastructure development would protect GRSG in the long term. The BLM failed to adequately address impacts to GRSG from predation. The DRMPA/DEIS fails to adequately analyze the impacts to sage-grouse outside PH areas. The FEIS should describe the effects of climate change on GRSG populations for both of these sections of the report.

ND 2/2

WY9

## Response

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The DLUPA/EIS contains only planning actions and does not include any implementation actions. Effects on GRSG population levels are not required to be quantified as part of the impact analysis. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

In its 12 month finding, the US Fish and Wildlife Service determined that the threat of hunting, "is not significant to the species such that it causes the species to warrant listing under the Act" (75 Federal Register 13966, March 23, 2010). Thus hunting was not analyzed in detail in the Draft Land Use Plan Amendment/DEIS. However, changes have been made to the Proposed Land Use Plan Amendment/FEIS to include analysis of the cumulative effects of hunting on GRSG.

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Impacts were considered on ... See Section 4.XX of the Draft EIS. [ACTION BLM (Renee): Provide direction if any changes to analysis is necessary.]

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[BLM ACTION ITEM FOR FEIS (Renee): Add analysis (in EIS) of indirect impacts on predation/mortality of GRSG from

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[BLM: Eventually need to fill this in:] Impacts from XX on greater sage-grouse were considered in Section 4.x of the Draft EIS. Include discussion of what changes were made and where. If no change made, describe why the impact analysis is adequate for that topic. Some template text:

While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS's impact analysis relevant to [speak to the specific topic or theme of the issue statement, e.g., anticipated fluid mineral development of the planning area] was found to need additional information and support for the

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Regarding the following issues:

- Hunting
  - Predation
  - Anthropogenic disturbance, disturbance caps, and lek buffers. [NOTE TO BLM: Makela- Discuss recomm. for managing lek viewing. Consult 2006 ID GRSG plan for wording.]
  - Expanding on beneficial effects on GRSG from range improvements
  - Greater sage-grouse population size and trend. –[NOTE TO BLM: Makela- Discuss approach to predicting population trajectories under alternatives.]
  - Livestock grazing, fences, and trailing. –Fence collision risks have been clarified in the FEIS per research done by Stevens (XXXX). [NOTE TO BLM: clarify fence collision risk per Stevens in the FEIS.]
  - Noise as related to low-level military overflights. – [NOTE TO BLM- Discuss military overflight/noise issue with Planning Leads. Is there a regional approach?]
  - Success of habitat improvement projects
  - Prescribed fire
  - Herbicides
  - West Nile virus
  - More detailed analysis of Alternative A
  - Climate change
  - Need to identify areas for restoration
  - Coal suitability- [NOTE TO BLM: Makela- Discuss coal mining. Clarify (IDMTSG-14-0153-39).]
- [NOTE TO BLM: Makela- Planning leads discuss comment IDMTSG-14-0242-16 from the USFWS.]

~~The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.~~

~~Additionally, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage grouse habitat. Each of the alternatives considers different means for accomplishing this strategy. For example, some alternatives place greater emphasis on avoidance of impacts, whereas other alternatives place more emphasis on minimization and mitigation.~~

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Types of Effects, under Land Uses and Realty Management 4.12.5; 4.12.6; 4.12.7; 4.12.8; 4.12.9-Impacts from Renewable Energy, 4.13.5; 4.13.6; 4.13.7; 4.13.8; 4.13.9-Impacts from GRSG Management, 4.14.1-Alt. C-Impacts from Leasable Minerals Management and 5.3.5-Conclusion.

~~The DEIS uses the most recent science which shows burning and/or manipulation of sagebrush is not beneficial in occupied GRSG habitats and that retention and restoration of existing GRSG habitats should be the highest priority (see Baker, 2011 and Connelly et al. 2011). Individual RMPs/LUPs can be referenced by the public for information on current management (Alt A). The DEIS specifically addresses amendments to the existing RMPs/LUPs. Current management actions for GRSG within existing BLM and FS RMPs/LUPs have been deemed inadequate by the USFWS. Hence, the warranted but precluded finding of GRSG by the USFWS. See the 2010 USFWS listing decision on GRSG for more detail on the warranted, but precluded decision.~~

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~~While a land use planning level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS's impact analysis relevant to [speak to the specific topic or theme of the issue statement, e.g., anticipated fluid mineral development of the planning area] was found to need additional information and support for the conclusions/findings. The BLM and the Forest Service have updated this information in the Proposed Land Use Plan Amendment/FEIS to provide the necessary information to make informed land use plan level decisions. Specifically, [insert a summary of the information that was updated and include a citation for where the reader could find it in the FEIS]. The DEIS is at a sub-regional scale not individual GRSG populations. The DEIS does include a discussion of the threats within each subpopulation and management zone. Appropriate conservation measures/management actions are based on the best available science which can be found in the BER.~~

~~The DEIS discusses the linkage of public and private lands and the potential for increased disturbance on private lands, additionally GRSG mapping efforts have given "checkerboard" GRSG habitats a lower priority designation (i.e. general habitat or non-habitat) where applicable. See the following sections: 4.3.2 Nature and Types of Effects, under Land Uses and Realty Management, 4.12.5; 4.12.6; 4.12.7; 4.12.8; 4.12.9 Impacts from Renewable Energy, 4.13.5; 4.13.6; 4.13.7; 4.13.8; 4.13.9~~



As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

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[NOTE to BLM: include additional language to the national response regarding the use of assumptions and how they aid in recognizing and resolving some of the uncertainty. As assumptions made for the analysis directly relate to the outcomes of The DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

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[NOTE TO BLM: if changes are made use text below.]

Impacts from XX on GRSG were revised in Section 4.2 of the FEIS. [Include discussion of what changes were made and where.] Some template text: While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS's impact analysis relevant to [speak to the specific topic or theme of the issue statement, e.g., anticipated fluid mineral development of the planning area] was found to need additional information and support for the conclusions/findings. The BLM has updated this information in the Proposed RMPA/FEIS to provide the necessary information to make informed land use plan-level decisions. Specifically, [insert a summary of the information that was updated and include a citation for where the reader could find it in the FEIS.]

~~Greater sage grouse conservation measures in A Report on National Greater Sage grouse Conservation Measures (NTT 2011) were used to form BLM management direction under Alternative B in the North Dakota Greater Sage Grouse RMPA, which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process). During scoping for the North Dakota Greater Sage Grouse RMPA/EIS, individuals and conservation groups submitted management direction recommendations, including the Sage grouse Recovery Alternative, for protection and conservation of GRSG and their habitat. The recommendations received during scoping, in conjunction with resource allocation opportunities and internal sub-regional BLM input, were reviewed to develop the management direction for GRSG under Alternative C. Conservation measures in this alternative are focused on both PH and GH.~~

The DRMPA/DEIS provides an adequate discussion of the environmental consequences of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented.

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As stated in Section 1.6.4, Issues Considered but Not Further Analyzed, in the DRMPA/DEIS, predator control is outside the scope of RMPA. The State of North Dakota possesses primary authority and responsibility for managing wildlife within the state. The BLM has authority to manage GRSG habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. However, the DEIS did not explicitly connect the effects of infrastructure and altering sagebrush habitat with the effects this could have on predators and predation of GRSG. Structural range improvements such as fences represent potential predator perches, and altering the sagebrush habitat of the GRSG can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The DEIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The DEIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks. This information has been included in the Final EIS in Section NOTE TO BLM: XX [NOTE TO EMPSI: need to provide analysis of impacts to GRSG from predation under each alternative – DEIS only discusses in the Nature and Type of Effects section] to more clearly state



NOTE: check for the hunting cumulative effects analysis. This is an individual plan discussion of the cumulative effects of hunting. It is not part of the subregional cumulative effects analysis.

Re assumptions: reference back to general NEPA response where it's covered 4.6.

no need to go point by point in the response. Just reference where to find the analysis in the FEIS.

Do include specific statement that coal was not an issue for analysis because there are no coal deposits within the planning area.

Include red paragraph about hunting. NOTE: check for the hunting cumulative effects analysis. This is an individual plan discussion of the cumulative effects of hunting. It is not part of the subregional cumulative effects analysis.



Issue statement #1 is confusing  
- consider rewriting.

1st & 2nd paragraphs are not  
appropriate for cum impact  
analysis discussion. Deleted.

Insert red text for intro  
language





Capture assumption guidance:

I. assumptions meet NEPA adequacy and follow guidance for development and use in analysis. NEPA handbook reference.

Explain why adequate.

Cross reference assumptions bit to general NEPA response in 4.0

clarify that sections that are OK and include the citation where the info is OK in the EIS.

For info that was NOT ok in the DEIS, be sure to include citations for where info was update/revised in the FEIS.

1st paragraph of the response does not hit on the point of the issue (how the measures would protect GrSG in the long run). Need to show (in the EIS or explain here) how the actions in Alt C would protect SG in the long run. If benefits are demo'd in the EIS, cite where found or where FEIS has been updated to demonstrate analysis.

Cite in the document where other points were discussed in the EIS (whether DEIS or FEIS).

Plan	Issue Statement
OR	The BLM needs to provide additional analysis regarding the cumulative effects of mining, vegetation treatments, and fences on greater sage-grouse. In addition, the cumulative effects analysis shows that the alternatives do not meet the purpose and need.

UT Commenters suggested that the BLM did not address the cumulative impacts of the sage grouse actions on non-BLM or Forest Service lands adequately. Commenters questioned the accuracy of cumulative impact analysis by WAFWA management zone.

ID-SW The BLM and Forest Service need to provide  
MT additional analysis regarding the cumulative effects of livestock grazing and land treatments. In addition, the agencies should predict greater sage-grouse population changes based on expected cumulative actions.

NV-CA 1/3 The cumulative effects analysis is deficient, as it should include analysis of issues beyond BLM and Forest Service authority, such as hunting and predation. Positive impacts to GRSG should be included, as well as the GRSG conservation measures implemented on the Modoc National Forest.

[Note to BLM: suggest reviewing all comments under this code, as they may result in changes to the EIS]

NV-CA

2/3

NWCO Commenters suggested that the BLM did not address the cumulative impacts of the sage grouse actions on non-BLM or National Forest System lands, and that BLM and FS should include a table or section that compares the anticipated outcomes of each alternative in protecting sage grouse populations.

Lewisto wn The BLM has not fully considered cumulative impacts on GRSG, particularly actions on adjacent lands. The BLM should include the Montana Greater Sage-Grouse Habitat Conservation Strategy in the cumulative effects section.



ND The DRMPA/DEIS failed to adequately address cumulative effects from West Nile virus.

WY9

## Response

The BLM and the Forest Service **analyzed** ~~thoroughly explained its consideration and analysis of~~ cumulative effects in the DLUPA/EIS in Section 4.XX. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective.

The BLM and the Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

The cumulative effects analysis discussion of relevant cumulative actions for WAFWA Management Zone IV and WAFWA Management Zones II and VII have been updated to be specific to the applicable zones. [NOTE TO BLM: Update this language as needed, this section was a copy/paste from Zone III instead of being modified to fit.]

~~The BLM thoroughly explained their consideration and analysis of cumulative effects to GRSG in the DLUPA/EIS in Section 4.X. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level. There may be a decline in GRSG population numbers and habitat that may continue for a period of time, despite implementing the Proposed Plan, but the~~

The BLM and the Forest Service ~~thoroughly explained its consideration and analysis of~~ analyzed cumulative effects in the DLUPA/EIS in Section 4.24.3, Special Status Species – Greater Sage-Grouse. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective.

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The BLM and Forest Service added quantitative analysis to Section 4.16 related to XXX topics. [Note to BLM/FS: insert description of any revisions made or if not, why not]

[NOTE TO BLM: Refine cumulative effects section as appropriate regarding cumulative effects analysis on existing fences, prescribed burning and other proposed treatments, and domestic livestock grazing.]

The BLM and Forest Service thoroughly explained their consideration and analysis of analyzed cumulative effects to GRSG in the DLUPA/EIS in Section 4.16. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective. The BLM and Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

~~Despite concerns over impacts of the West Nile virus (WNV) on GRSG populations, actual prevalence of the virus in wild populations remains unknown (Walker et al. 2007). Although the WNV has been documented in Nevada and California (1 detection in NV in 2005 and 2 detections in CA 2004 & 2005 outside of the NV/CA Sub-region) (Walker and Naugle 2011), the impacts of the WNV on GRSG in the future will depend on temperature, rainfall, and changes in vector distribution. Temperature strongly affects physiological and ecological processes that influence WNV transmission, and outbreaks are typically associated with prolonged periods of above-average temperature and drought (Walker et al. 2007). Due to the climate of the planning area, the spread of the WNV and impacts to GRSG in the planning area are speculative at this time and, therefore, was not included in the scope of the cumulative impact analysis in the DLUPA/EIS. The USFWS also concluded that, "at this time, we find that neither disease nor predation is a sufficiently significant threat to GRSG now or in the foreseeable future that it requires listing under the Act as threatened or endangered based on this factor (USFWS 2010). The BLM and Forest Service understands the potential threat to GRSG from the WNV and has made reference to it in the~~

## GRSG Hunting Response

Contemporary hunting seasons in the Nevada and Northeastern California Sub-region are generally very conservative due to their length and bag limits. The Nevada GRSG hunting season is limited to 10-15 days with a bag limit of 2 birds daily and 4 birds in possession. While California allows a 2 day season and a bag limit of 2 birds per permit. Where GRSG populations are considered rather small and/or isolated, hunting seasons have been closed. Five counties in Nevada and over 20 hunt units have been closed to GRSG hunting since 1997. In California, two hunt zones were closed in 2012 and 2013 due to large wildfires within the Buffalo Skedaddle Population Management Unit. These units will likely remain closed to GRSG hunting in future years until significant habitat and population recovery occurs.

The biological issue remains whether or not hunting GRSG is additive, and contributes to population declines, or compensatory with other sources of mortality (e.g. predation). Research conducted on GRSG hunting indicates that local circumstances, such as overall population size and connectedness, habitat condition and proximity to urban areas may play an important role as to whether mortality is additive or compensatory. In a long-term study conducted in Eureka County, Nevada, Blomberg et al. (2013) found that human harvest accounted for 2 percent of all mortality and did not adversely impact GRSG populations.

There are ancillary benefits to GRSG hunting. Even though few hunters purchase a hunting license specifically for GRSG hunting, hunting license dollars are used to match federal grants (Pittman-Robertson Act) to conduct monitoring work annually, conduct research projects and implement habitat enhancement and restoration projects. Additionally, wings from hunter harvested GRSG are analyzed annually to determine nest success, recruitment and overall population viability. Cessation of hunting would likely eliminate the usage of hunting license dollars as a match for federal aid grants and greatly reduce annual monitoring efforts, research and habitat restoration projects that are currently funded through this mechanism. (NDOW 2014). (Review Comments to the Nevada and Northeastern California Sub-Area Sage-grouse LUPA/DEIS)

BLM needs to add National/WO verbiage on predation:

Predator Control Response:

In the USFWS 2010 Listing Decision (75 Federal Register. 13910), the USFWS stated “Based on the best scientific and commercial information available, we conclude that predation is not a significant threat to the species such that the species

Predator management research has not provided sufficient evidence to support implementation of predator control to improve GRSG populations over broad geographic or temporal scales. The limited information available suggests predator management may provide short-term relief for GRSG population sinks in the few cases where the situation has been documented (Hagen 2011, p95-100). Most GRSG research has failed to quantify predator community structure or predation rates in relation to habitat variables, let alone within the landscape contexts. Thus, it is not currently possible to understand relationships among habitat structure, demographic rates of GRSG, and the predator community of an area and to incorporate these into broad-scale based predator management programs for GRSG. It is critical for future GRSG conservation efforts to quantify these variables to better understand the impacts of predation on GRSG life history (Hagen 2011, p95-100). The most effective long-term predator management for GRSG populations may be through maintaining connectivity of suitable habitats (Shroeder and Baydack 2001).

A recent predator study was conducted by Lockyer et al. (2013) in the Virginia Mountains of Northeastern Nevada within the Great Basin. This study revealed that common ravens accounted for 46.7% of nest depredations within the study area. However, Lockyer et al. clearly stated that this study was not representative of the entire Great Basin for two main reasons. The first was due to significantly lower GRSG cumulative nest survival rates, which were documented at 22.4% within the study area. This survival rate is significantly lower than other published results for GRSG in the Great Basin. Secondly, the study area is not representative of the entire Great Basin or of the NV/CA Sub-region due to increased anthropogenic disturbances. Anthropogenic disturbances and raven abundance is positively associated with human-caused habitat alterations.

Citations:

Hagen 2011. Predation on GRSG: facts, process and effects. Pp 95-100

USFW Service 2010 Listing Decision (75 Federal Register. 13910)

Shroeder and Baydack 2001

As noted previously in Sections 4.6, 4.7, and 7.7 of this Report, the BLM and FS complied with the CEQ regulations for developing the direct, indirect, and cumulative impacts analysis.

Chapter 4, Table 4.2 Comparison of Alleviated Threats to GRSG in Northwest Colorado by Alternative provides an overview of how each threat would be alleviated on BLM and National Forest System lands. In addition to this table, the BLM and Forest Service prepared a cumulative impact analysis contained in Chapter 5, Section 5.4 that describes the cumulative impacts arising from each threat on all habitat and land ownerships. It would be difficult to prepare a table that shows how threats would be alleviated on private lands, but the Colorado Package also identifies Greater sage-grouse conservation activities that are happening and/or are planned to happen on private lands. In addition, the BLM and Forest Service have prepared a Tier II Cumulative Effects Analysis that will be completed at the WAEWA Management Zone 2 level

The BLM ~~thoroughly explained its consideration and analysis of~~ analyzed cumulative effects to GRSG in the DRMPA/DEIS in Section 5.2. The DRMPA/DEIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.

The DLUPA/EIS contains a qualitative discussion of cumulative effects at the WAFWA Management Zone scale to set the stage for a more quantitative analysis to be contained in the Proposed Land Use Plan Amendment/FEIS. Additional quantitative cumulative analysis was added to the Final EIS in Section 5.2, Greater Sage Grouse [NOTE TO BLM: waiting for analyses from national team. Will include more details as they become available.]

[NOTE TO BLM: insert description of any revisions made or if not, why not]

[Depending on the specifics of the issue, note anything additional that supports the present and future actions regardless of

The BLM thoroughly explained its consideration and analysis of analyzed cumulative effects to GRSG in the DRMPA/DEIS in Section 5.2. The DRMPA/DEIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level. ~~The BLM thoroughly explained its consideration and analysis of cumulative effects to GRSG, including West Nile virus, in the DRMPA/DEIS in Section 5.2. The DRMPA/DEIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. The BLM has complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level.~~

As stated in Section 5.2.2, WAFWA Management Zone I Analysis, the BLM may require certain management of or changes to the design of stock ponds, coal-bed methane ponds, and other anthropogenic water sources associated with uses of public lands to reduce the likelihood for mosquito breeding and disease transmission. Alternative A does not contain any provisions for restricting the spread of West Nile virus. Alternatives B, C and D would design new water features for livestock such that they do not contribute to the spread of West Nile virus. Although the specific design and extent of deployment of these protective features is unclear, the provision makes Alternatives B, C and D more likely to reduce the threat of disease to



## NCT Notes

## Regional Team NOTES, EDITS, COMMENTS

Clarify summary statement and/or response. What is considered in the summary statement doesn't jive with the specifics noted in the response. Suggest revising the summary statement for specifics in the response or eliminate the specifics in response and keep the issue statement more general.

for 2nd sentence in issue statement, reference back to general NEPA 4.3 response re: how all the alts meet the P/N.

NCT to provide language to  
BLM re: cum analysis for  
WAFWA zones.

NCT to provide language to  
BLM re: cum analysis for  
WAFWA zones.

Replace this detail with the general language that your cum analysis is OK (see red text). Keep WNV language, but don't need to include impact analysis language (strike out). Keep the explanation for Madoc not included.

Reconcile the issue statement with response; disconnect between general issue statement and detailed response.

**NTC to draft additional response for WNV issue.**

This is detail that is not identified in the issue statement. NCT recommends scaling back the response to the more generalized response that reflects the general nature of the issue statement.

If want to include some reference to the subissues, suggest setting up issue statement with language such as "...inadequate cumulative analysis in topics including hunting, predation, etc..." Then provide a simple cross reference for where the analysis is provided in the EIS. E.g., Hunting is addressed in the FEIS section XXX; predation is addressed in section XXX; etc.

Included the general language if needed (CA: double check the canned language to see if general cum analysis language is in either section 4.6, 4.7 or 7.7. If not include it here. Same as NV above.)

Add in red text.

Re: the State plan, probably just need to say whether the plan was incorporated into the cumulative analysis or that the plan didn't come out in time to include or consider.

Use the provided language for  
intro (see red text).

Plan	Issue Statement
OR	The BLM's mitigation strategy needs clarification, particularly related to the disturbance cap, RDFs, compensatory mitigation, and monitoring. The primary threats to the bird's survival of wildfire, invasives, and juniper encroachment are not thoroughly addressed.



UT Commenters encouraged BLM and Forest Service to incorporate in the LUPA management objectives and directive that permit development of an Enhanced Mitigation/Expanded Use Authorizations Program. More detail should be provided in the FEIS regarding the ways in which the disturbance caps would be monitored and implemented. The DLUPA/DEIS failed to provide hard evidence that compensatory mitigation actually increases sage grouse populations. The DLUP/DEIS failed to provide science describing effectiveness of proposed mitigation. The BLM needs to clarify how mitigation would be required for private lands and valid existing rights.

The BLM should consider the following mitigation measures in the FEIS:

- Sage-grouse “banking program/system”
- Compensatory mitigation of all unavoidable direct, indirect and cumulative impacts
- Larvicide applications for West Nile virus
- On-sight hierarchy

ID-SW MT The BLM and Forest Service mitigation strategy is inadequate or needs clarifications. Topics of concern include:

- Certainty that mitigation will be implemented
- Lack of scientific evidence that mitigation and habitat restoration results in greater sage-grouse population increases
- Adequacy of the monitoring program
- Effectiveness of compensatory mitigation
- How mitigation proposals will be evaluated
- Siting of mitigation actions
- Durability of mitigation investments
- Consideration of using mitigation banks
- Creation of a mitigation program
- Framework behind exceptions and associated mitigation, e.g., science behind allowing exceptions; offsetting losses and prove mitigation is successful
- Need for mitigation given the restrictive management in the alternatives
- Link between compensatory mitigation and adaptive management

NV-CA The success of mitigation and sagebrush restoration is limited and the BLM and Forest Service should not use a broad-scale map as a basis for site-specific mitigation. Mitigation should be feasible and consistently applied. Commenters requested clarification and/or revisions to various mitigation measures, including the mitigation banking program and several BMPs/RDFs. [Note to BLM: consider reviewing the following comments for changes to the EIS:

- 0052-8
- 0120-14 through 18
- 0132-12
- 0188-25
- 0344-14

NWCO The BLM needs to consider a comprehensive mitigation and monitoring program for sage grouse that includes explicit criteria for determining the adequacy of the management actions.

Lewisto Commenters provided recommendations to  
wn strengthen or clarify mitigation measures. The BLM should provide more details on their adaptive management strategy, monitoring, [fire and invasive species management](#), and mitigation, including compensatory mitigation.

ND The DRMPA/DEIS should consider a moratorium on the construction of coalbed methane wastewater retention and infiltration reservoirs.

WY9

## Response

The BLM and Forest Service have updated the FEIS with additional information for the mitigation, monitoring and adaptive management strategies.

Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with the BLM's Regional Mitigation Manual MS-1794, Forest Service Handbook FSH 1909.15, and CEQ regulations at 40 CFR 1508.20.

The Monitoring Framework in Appendix X outlines the methods that the BLM and USFS will use to monitor habitats and evaluate the implementation and effectiveness of the planning strategy to conserve the species and its habitat. The regulations for the BLM (43 CFR 1610.4-9) and the USFS (36 CFR 219.12) require that land use plans establish intervals and standards, as appropriate, for monitoring and evaluations, based on the sensitivity of the resource to the decisions involved. BLM and USFS will use the methods described in Appendix X to collect monitoring data to evaluate implementation and effectiveness of the Greater Sage-grouse planning strategy and the conservation measures contained in land use plans. To ensure that the BLM and USFS have the ability to make consistent assessments about sage-grouse habitats across the range of the species, the framework in Appendix X provides the methodology for monitoring the implementation and evaluating the effectiveness of BLM/USFS actions to conserve the species and its habitat through monitoring that informs effectiveness at multiple scales.

Implementation monitoring results will provide information to allow the BLM and USFS to evaluate the extent that decisions from the BLM resource management plans (RMP) and USFS land management plans (LMP) to conserve greater sage-grouse

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Implementation monitoring results will provide information to allow the BLM and USFS to evaluate the extent that decisions from the BLM resource management plans (RMP) and USFS land management plans (LMP) to conserve greater sage-grouse

The DLUPA/EIS contains planning actions and does not include site-specific implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis (EIS) and expand the environmental analysis when more specific information is known.

BLM describes best management practices (BMPs) as "state-of-the-art mitigation measures". The aim of BMPs is to protect wildlife, air quality, landscapes, and other natural resources. BMPs tend to be general principles for resource protection and are not in themselves regulatory in nature. BLM's policy is that all "Field Offices consider BMPs in National Environmental Policy Act (NEPA) documents to mitigate anticipated impacts to surface and subsurface resources. BMPs are not "one size fits all." The actual practices and mitigation measures best for a particular site are evaluated through the NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions.

Mitigation, adaptive management and a monitoring framework were developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate datasets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013). [If needed, based on specifics of comments and/or summary statement, include statement to the effect that broad- and mid-scale monitoring will be conducted as funding allows.]

[Refer to the Monitoring Framework in the appendix.] To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife The BLM and Forest Service have updated the FEIS with additional information for the mitigation, monitoring and adaptive management strategies.

Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with the BLM’s Regional Mitigation Manual MS-1794, Forest Service Handbook FSH 1909.15, and CEQ regulations at 40 CFR 1508.20.

The Monitoring Framework in Appendix X outlines the methods that the BLM and USFS will use to monitor habitats and evaluate the implementation and effectiveness of the planning strategy to conserve the species and its habitat. The regulations for the BLM (43 CFR 1610.4-9) and the USFS (36 CFR 219.12) require that land use plans establish intervals and standards, as appropriate, for monitoring and evaluations, based on the sensitivity of the resource to the decisions involved. BLM and USFS will use the methods described in Appendix X to collect monitoring data to evaluate implementation and effectiveness of the Greater Sage-grouse planning strategy and the conservation measures contained in land use plans. To ensure that the BLM and USFS have the ability to make consistent assessments about sage-grouse habitats across the range of the species, the framework in Appendix X provides the methodology for monitoring the implementation and evaluating the effectiveness of BLM/USFS actions to conserve the species and its habitat through monitoring that informs effectiveness at multiple scales.

Implementation monitoring results will provide information to allow the BLM and USFS to evaluate the extent that decisions from the BLM resource management plans (RMP) and USFS land management plans (LMP) to conserve greater sage-grouse There are no coalbed natural gas wells projected for any of the proposed alternatives under the oil and gas RFD used for analysis in the DRMPA/DEIS. This type of energy development is not an issue in the North Dakota Greater Sage-Grouse planning area.





**NOTE TO  
SUBREGIONAL TEAMS:**

The responses were replaced with new National response language. Please follow this information for responding to the issues of mitigation strategy, monitoring plan, and adaptive management. Specific national language for each topic are provided in the mitigation, monitoring, and adaptive management tabs in the workbook.

Also, the second issue statement is not clear how it relates to the mitigation and/or monitoring strategies.

Rest of the response should address whether BLM accepted the proposed additional mitigation measures. If already considered in EIS, note where they are ("see section XX")

Statement: Consistency  
applied with Bureau-wide  
strategy see Ap XX in FEIS.

This is good intro language to use in other areas too.

Use language for effectiveness and implementation monitoring to address individual points of clarification (e.g., commenters said not enough info on monitoring for disturbance cap, fire, etc.)

NOTE TO BLM: NCT inserted the suggested language for site specific analysis & BMP application.

Blue text should be addressed under the appropriate topic rather than generically under mitigation/monitoring for sage grouse. Also, response to blue issue is not provided in this response.

Last paragraph re: BMPs is not addressed in the issue statement. suggest deleting it or revising the issue statement and keeping the response text.

why is this here? Should be deleted or issue statement clarified to note that the moratorium is a suggested mitigation measure provided by commenters.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
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OR A number of comments were provided related to the range of alternatives for ACECs and RNAs:

1. The DRMPA/DEIS inconsistently qualifies RNAs. On the one hand stating that RNAs are intended to be undisturbed and managed for minimum human disturbances and on the other hand describing them as areas where disturbances have occurred in the past and allowing for future disturbances.

2. The RMPA does not evaluate whether the added ACEC purposes (GRSG) are compatible with the existing uses and management prescriptions. Some existing relevant and important values appear to be incompatible with GRSG management (e.g., wild horses, grand fir forests, and old growth juniper).

3. The analysis of the relevance and importance criterion doesn't provide scientific support for the conclusions that the areas are uniquely necessary for GRSG. The BLM doesn't analyze whether the areas require special management attention and no special management attention specific to the

UT The BLM can use other administrative designations other than areas of critical environmental concern, such as Priority Areas, to protect Greater Sage-Grouse. Commenters recommended that BLM designate a proportion of the preliminary priority habitat as greater-sage-grouse priority areas, and that they be considered for designation as Areas of Critical

ID-SW  
MT Issue 1: In the Draft EIS/LUPA, the BLM/FS did not accurately or consistently represent the number of ACECs being proposed under each alternative, particularly Alternative C.

Issue 2: Alternatives in the Draft EIS/LUPA do not provide an adequate range of management actions for ACECs by only considering new ACECs under two of the action alternatives (C and F).

Issue 3: Whether ACECs or another administrative designation, the BLM/FS should ensure any administrative designation established for the protection of sage-grouse habitat will provide adequate non-discretionary protections.

NV-CA BLM has not provided sufficient details regarding population numbers and critical needs in the specifically identified areas, or consideration for other administrative designations besides ACECs to manage Greater Sage Grouse habitat.

NWCO n/a

Lewisto The BLM has the authority to designate the  
wn potential GRSG ACEC even though it  
overlaps with PH. This overlap does not  
justify failing to designate the ACEC and the  
fact that a proposed PH may overlap with an  
ACEC does not obviate the need for the PH.

ND n/a  
WY9

## Response

The BLM considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM fully considered the management opportunities presented in the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, five action alternatives were analyzed in detail in the RMPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the RMPA/EIS represented a full spectrum of options.

As noted in section 4.3, NEPA Range of Alternatives, of this report, the alternatives, including the management actions for the fire program meet the purpose and need for the EIS. All or part of Key RNAs identified in the Final EIS would be closed under the preferred alternative to all disturbance types, including livestock grazing, OHV, minerals development, and lands and realty actions. The reason for these closures would be for research-related activities, including studying natural sagebrush communities important to sage-grouse in the absence of land disturbing activities, as well as studying the effects of climate change on these vegetative communities. Minimum disturbance could be allowed in a controlled manner to conduct research related to land management activities. Such activities could include weed treatments to protect natural plant communities, fuels treatments research, and grazing research. A very limited amount of disturbance may occur for administrative purposes, but this would be contained within small areas and would have only short-term impacts.

Appendix I has been updated to include only tables for ACECs and RNAs and the goals and objectives have been moved to the appropriate sections in Chapters 2 and 3. Appendices I and J have been reviewed for consistency with the rest of the document and updated where needed.

No new ACECs or RNAs will be created or designated as part of the proposed action in the Final EIS. A subset of 5 ACECs and 22 RNAs would change management goal to improve protections for GRSG habitat. [Note to BLM: Include rationale for why not including new ACECs in proposed alternative.] Within this subset, only portions of an ACEC or RNA may change. These types of designations are not in the BLM Land Use Planning Handbook (H-1601-1). The BLM has determined that, under any of the alternatives, management proposed to protect GRSG would be equivalent to protections afforded via an ACEC or other designation.

Response 1: [NOTE TO BLM: Review EIS/LUPA for consistent representation of proposed ACECs under Alternatives C and F.]

Responses 2 and 3: **As noted in section 4.3, NEPA Range of Alternatives, of this report, the alternatives, including the management actions for the fire program meet the purpose and need for the EIS.** Alternatives within the EIS have established that not all protective management for the Greater Sage Grouse is limited to ACEC designation. Only Alternatives C and F proposed to establish ACECs for the protection and management of the Greater Sage Grouse. While the other alternatives do not propose such designations, they still contain similarly specific management prescriptions to manage and protect the Greater Sage Grouse and its habitat that would be equivalent to protections afforded via an ACEC or other designations.

In general, when determining the Relevance values for a potential ACEC, a wildlife resource consists of but is not limited to “habitat for endangered, sensitive or threatened species or habitat essential for maintain species diversity. Specific population numbers are not identified as a requirement for a relevance value. Population numbers are not identified for Importance values; which requires that the resource have a substantial significance and value to satisfy this criterion. Importance values require that the resource have special worth, consequence, meaning, distinctiveness or cause for concern. Other values can include:

- Sensitive, endangered, threatened or vulnerable to adverse change etc.
- Warrants special protection to satisfy national priority concerns or mandates of FLPMA.

This EIS at 1.3 Purpose and Need provides the rationale for the critical need to protect Greater Sage Grouse populations.

**Within the range of alternatives, there are management actions provided to protect sage-grouse some of which are ACECs. For example, Alternatives within the EIS have established that not all protective management for the Greater Sage Grouse is limited to ACEC designation. Only Alternatives C and F proposed to establish ACECs for the protection and management of the Greater Sage Grouse. Alternative E has identified areas as Sage-Grouse management areas (SGMAs) not ACECs. Alternatives B and D identify areas as Primary Priority and General Management Areas which in effect are not designations such as an ACEC but still contain similarly specific management prescriptions to manage and protect the Greater Sage**

n/a

The assertion that the BLM cannot designate PH as a special management area is correct. However what the BLM has done in the DRMPA/DEIS is identify priority areas (habitat) for management for GRSG. In these areas, management prescriptions are identified. These areas are not synonymous and should not be confused with special management areas or special designation areas.

In developing the Proposed RMPA/Final EIS, the Authorized Officer reviewed the environmental analysis and determined that special management attention is not required to protect the potential ACEC because management prescriptions laid out for GRSG, which the ACEC was designed to protect, are sufficient to protect the species [NOTE TO BLM: Please review this language and ensure that it is correct/appropriate. A determination of this sort is required in the FEIS or ROD (see BLM Manual 1613.33.E., Rationale for Designating or Not Designating)]. This is documented on page 4-126 of the Draft RMPA/EIS, which says, "Management actions in the new GRSG ACEC would be the same as those actions proposed for GRSG habitat outside the ACEC, including ROW exclusion areas, closures to mineral entry, and livestock grazing limitations." In other words, the ACEC would not provide any additional protection for the species on top of what is proposed outside of the potential ACEC.

In the absence of ACEC designation, the BLM must still analyze impacts on GRSG from federal actions that may affect the species or its habitat in accordance with the NEPA.

n/a

Issue statement 5 sounds like opinion. Is it relevant to include here?

No need to create redundant statements. Refer back to 4.3 Range of Alts for standard NEPA requirements.

The linkages between what statements are being responded to with response paragraphs is a bit unclear. Perhaps use numbering in the paragraphs to correlate to numbered issue statements.

Last paragraph of the response (the 20/50 issue) isn't addressed in the issue statement. Consider adding something to the issue statement to address it.

Second sentence sounds like opinion/voting. Suggest deleting it as the response does not address it.

Suggest referencing back to NEPA 4.3 range of alternatives as intro to response on issue 2 and perhaps expand a bit more on the explanation for why ACECs were addressed in 2 alts. See red text. Suggest changing the "should" in issue statement 3 to "needs" - sounds less like an opinion that way.

Issue statement should link the population numbers and critical needs back to the R&I criteria of ACECs (as touched on in the first sentence of the response).



Issue statement is confusing.  
--BLM can designate ACEC  
when it overlaps with PH  
--If it overlaps then BLM can't  
use that excuse to NOT  
designate an ACEC  
--Just because you have an  
existing ACEC, you still need  
to designate PH

Also, not clear how the  
response is addressing the  
points of the issue statement.  
Suggest revising the issue  
statement to fit response, or  
revising the response to make  
the link with the key issue of

Plan	Issue Statement
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OR	Commenters asserted that a number of proposed RNAs do not meet the criteria and should therefore not be considered.
----	---

UT n/a

ID-SW n/a

MT

NV-CA BLM should consider designating PPH areas as potential ACECs since the habitat within these areas meet with ACEC Relevance and Importance criteria.

NWCO n/a

Lewisto The proposed GRSG ACEC does not meet the relevance and importance criteria required of an ACEC under 43 CFR 1610.7.2.

ND n/a

WY9

## Response

The priority RNAs listed in Table I-2, Existing Priority RNAs for Long-Term Monitoring, have been reviewed for their applicability and relevance. **Of the RNAs that were reviewed, some were determined to meet the applicability and relevance criteria and** ~~as listed in the DEIS, have been reviewed for~~ ~~that have been determined to be crucial for long-term monitoring;~~ **they** have been reclassified as Key RNAs in the FEIS. **Those that did not meet the criteria, were dropped from further consideration as a special designation.** Appendix I has been updated accordingly. The Burro Spring/Spanish Lake Allotment has been removed from the list of key RNAs in the FEIS.

[Note to RIM: Review this response for accuracy.]

n/a

n/a

One of the alternatives within the EIS does identify PPH areas as potential ACECs.

n/a

The process for determining whether or not a nominated ACEC meets the relevance and importance criteria is detailed in Appendix E, Area of Critical Environmental Concern Evaluation of Relevance and Importance Criteria, of the Draft RMPA/EIS.

According to BLM Manual 1613, Areas of Critical Environmental Concern, an area must meet at least one relevance and one importance criterion to be considered as a potential ACEC and analyzed in resource management plan alternatives (see BLM Manual 1613.11, Identification Criteria). Through the evaluation process, the BLM determined that the nominated ACEC for GRSG met relevance criteria for a fish and wildlife resource and a natural process or system. The nominated GRSG ACEC also met the importance criteria because it warrants national priority/FLPMA protection (see page E-3).

BLM Manual 1613, Areas of Critical Environmental Concern, directs that, "All areas which meet the relevance and importance criteria must be identified as potential ACEC's and fully considered for designation and management in resource

n/a

Issue statement should be updated to say what criteria are not being met.

Relevance & Importance criteria are discussed in 8.1, and we suggest moving it there.

Plan	Issue Statement
------	-----------------

OR	n/a
----	-----

UT	n/a
----	-----

ID-SW M	n/a
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NV-CA	n/a
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NWCO	n/a
------	-----

Lewistow	n/a
----------	-----

ND	n/a
----	-----

WY9

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	<p>The BLM should consider these additional studies that suggest noise can greatly affect Greater sage-grouse.</p> <p>Patricelli, G. L., J. L. Blickley, S. L. Hooper. 2012. The impacts of noise on greater sage-grouse: a discussion of current management strategies in Wyoming with recommendations for further research 6 and interim protections. Unpublished report. Prepared for the Bureau of Land Management, Lander Field Office and Wyoming State Office, Cheyenne and Wyoming Game and Fish Department; available at <a href="http://www.wy.blm.gov/jio-papo/papo/wildlife/reports/sagegrouse/2012sgNoiseMon.pdf">http://www.wy.blm.gov/jio-papo/papo/wildlife/reports/sagegrouse/2012sgNoiseMon.pdf</a>.</p> <p>Blickley, J. L., K. R. Word, A. H. Krakauer, J. L. Phillips, S. N. Sells, C. C. Taff, J. C. Wingfield, G. L. Patricelli. 2012. Experimental chronic noise is related to elevated fecal corticosteroid metabolites in lekking male greater sage-grouse (<i>Centrocercus</i></p>
Lewisto	n/a
wn	
ND	n/a
WY9	

## Response

n/a

n/a

n/a

n/a

As noted previously in Section 4.4, Best Available Information, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment. Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that... *[include which references were already in the EIS, which ones are the same, and which ones are new. For new ones, include statement as to finding for whether the information is the same or different from that already covered in the other references cited in EIS.]* This information is provided in Section XX of the FEIS.

*[NOTE TO BLM: If the information is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where.]*

n/a

n/a

Combine with Section 32.2,  
Noise



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	BLM needs to consider the Patricelli et al. study that suggests new dB(A) levels for interim protections. The BLM also needs to include additional information in chapter 3 regarding the relationship between the ambient sound environment and life-cycle requirements for nesting, breeding and
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

NOTE TO BLM: Review study and determine if the findings are essentially the same as you've already considered or if they provide new information that should be included in the EIS.

n/a

n/a

n/a

Combine with Section 32.2,  
Noise.

Plan	Issue Statement
OR	n/a
UT	The DLUPA/DEIS failed to adequately analyze the effects to air quality from oil and gas development related to removing or restricting development of transmission lines in ROWs. Additionally, the DLUPA/DEIS fails to adequately address the impacts to air quality from livestock grazing.

ID-SW n/a  
MT  
NV-CA n/a

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the DEIS's impact analysis relevant to effects to air quality from oil and gas development from removing or restricting development of transmission lines in ROWs was found to need additional information and support for the conclusions/findings. The BLM and the Forest Service have updated this information in the Proposed Land Use Plan Amendment/FEIS to provide the necessary information to make informed land use plan-level decisions. Specifically, [EMPSi ACTION ITEM; insert a summary of the information that was updated and include a citation for where the reader could find it in the FEIS.].

In regards to impacts from livestock grazing, land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered

n/a

n/a

n/a

n/a

n/a



The livestock grazing issue  
statement and response needs  
to link back to GRSG  
management actions.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-	n/a
SW	
MT	
NV-	n/a
CA	

NW The BLM failed to include a climate change  
CO alternative, and failed to evaluate the potential  
effectiveness of climate change management  
actions on lessening the threat to sage-  
grouse.

Lewis n/a  
town  
ND n/a  
WY9



Response

NCT Notes

n/a

n/a

n/a

n/a

*[NOTE to BLM: I think this is one where you would stick by standard verbiage for how BLM handles climate change in their RMP revisions/amendments. Also, if you have language already that supports why you didn't include a climate change alternative, then reiterate it here with some additional input from SOL. Have NCT review to determine if additional information/edits are needed that can be used in other subregions.]*

The PRMP/FEIS does disclose the potential effects associated with global climate change on the Greater Sage-grouse (Draft LUPA/EIS, page 804). However, pursuant to 40 CFR 1500.1(b), information must be "of high quality" in order to be considered in the analysis. As explained in the EIS, ~~while it is not speculative that changes in conditions will likely occur due to climate change,~~ it is speculative to attempt to predict the specific nature or magnitude of such changes. As noted on page 805, "In summary, climate change has the potential to have profound impacts for those critical habitats that support GRSG populations within the planning area. As the temperatures warm and precipitation patterns change this may change vegetation communities which may cause impacts on GRSG. These climate changes, along with current non-climate related stressors may have

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-	n/a
SW	
MT	
NV-	Commenters presented two opposing issues
CA	regarding the range of climate change management actions. One commenter suggested that the management actions related to drought should be eliminated because it would be impossible for the BLM and Forest Service to adequately implement. Other commenters felt that there were not enough management actions that addressed climate change citing the USFWS found it to be a major threat. Lastly, the BLM and Forest
NW	n/a
CO	
Lewis	n/a
town	
ND	n/a
WY9	

Response

NCT Notes

n/a

n/a

n/a

[No response provided]

Suggest adding definition of drought to glossary or in text and state changes made (either to glossary or FEIS) in response. Add justification as to why drought was included.

Suggest using language from NWCO in section 10.0 of this report for response to climate change impacts.

n/a

n/a

n/a



Plan	Issue Statement
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OR	Commenters question the suitability of GRSG habitat in Mormon Basin and the inconsistencies and lack of information in Chapter 3.
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UT	n/a
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ID-	n/a
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SW	
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MT	
----	--

NV-	BLM needs to make sure the assumptions used for baseline conditions are consistent with Climate change section/analysis in chapter 3.
CA	

NW	BLM should have applied the Colorado
----	--------------------------------------

CO	Plateau REA information across the entire NW Colorado Sage-grouse planning area.
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Lewis	n/a
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town	
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ND	n/a
----	-----

WY9	
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Response	NCT Notes
<p>Mormon Basin is at a suitable elevation for GRS. Any inconsistencies and lack of information in Chapter 3 will be reviewed.</p>	<p>It seems like this is a question of Sage-Grouse habitat. Would this be better off in the sage grouse response.</p>
<p>n/a</p>	
<p>n/a</p>	

NOTE TO BLM: Review DEIS and determine if additional information is needed per NEPA standards for baseline information. Also double check the Cagney study and determine if the findings do actually support your inclusion of management actions for drought management.

- need to reword assumption in document to address comment 0130-1
- comment 2 BLM needs time to review document 0144-13
- The best available science was used which the climate change section of the Eco-regional assessment
- Cagney reference was not used in regards to drought. (Verify in document)

The BLM did consider and use the Colorado Plateau REA and cited the document in the impacts to climate change section. Bryce, et. al. is cited in Section 4.28.11.

n/a

n/a





Plan Issue Statement

OR The BLM needs to estimate carbon storage and greenhouse gas emissions from grazing in relation to climate change, and discuss implications to vegetation.

UT The EIS does not adequately address the impacts of livestock grazing in conjunction with climate change on vegetation communities. Climate change effects in the southern part of the Panguitch Population Area should be eliminated or identified as speculative based on inconclusive models.

ID- n/a

SW

MT

NV- BLM needs to revise the finding that

CA Alternative E is the same as Alternative A; it is different because it constrains resource use and would decrease any GHG emissions associated with a particular use, similar to those described in the section for Alternative

NW n/a

CO

Lewis Commenters requested that the FEIS include  
town an analysis of the effects of climate change on the potential for cheatgrass and other invasive plants to spread in the future and affect GRSG habitat, as well as evaluate the contribution of livestock grazing on greenhouse gas emissions and the impacts of livestock grazing in conjunction with climate change on vegetation communities.

ND n/a

WY9

Response

NCT Notes

Assessing the impacts of grazing on climate change is outside the scope of this document, except as it pertains to reducing impacts on GRS and GRS habitat within the planning area and in consideration of valid existing rights and the BLM's multiple use mandate under the Federal Land Policy and Management Act. The Draft EIS evaluated alternatives that would incorporate GRS habitat objectives into BLM grazing allotments and permit renewals (Alternatives D and E) and that would remove livestock grazing from allotments in priority and general habitat (Alternative C and, to a lesser extent, Alternative F), and the associated effects these alternatives would have on GRS and GRS habitat. The BLM considered a reasonable range of alternatives as relates to grazing during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. The analysis presented in the EIS will allow decision makers to make an informed decision pertaining to the effects of differing livestock grazing scenarios on GRS and its habitat.

[BLM note: BLM to ask Lauren M. about requirement for and language for climate change

The DLUPA/EIS provides an adequate discussion of the environmental consequences of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1

Suggest making first paragraph more specific to climate change. Where was this discussed in the EIS? Consider incorporating the NEPA regulations into the second paragraph or combining the first and second paragraph.

Per the requirements of NEPA as noted above, the effects of livestock grazing on GRS and GRS habitat are discussed in Section 4.2 under Impacts from Domestic Livestock Forage Use (Herbivory) (page 4-37 of the DLUPA/DEIS), including the compounding effects of drought conditions on the herbivory (page 4-41 of the DLUPA/DEIS).

Regional climate change projections were developed as part of the Colorado Plateau Rapid Ecological Assessment (REA; Bryce et al. 2012) and are summarized in Section 3.4.1, Conditions Statewide (Climate Change) of the DLUPA/DEIS. The methodology for the regional modeling is described in Section 3.2.7 of the REA and the results of the modeling are contained in Section 5.4 of the REA; both sections are available at Internet Web site:

[http://www.blm.gov/wo/st/en/prog/more/Landscape\\_Approach/reas/coloplateau.html](http://www.blm.gov/wo/st/en/prog/more/Landscape_Approach/reas/coloplateau.html). As described in Section 3.4.1 of the DLUPA/DEIS (page 3-42), the northern part of the

n/a

- BLM needs time to check the "new" alternative E to see if comment still applies.

n/a

Text stating that climate change has the potential to produce warmer and drier conditions that may increase the potential for the spread of cheatgrass and other invasive plants over current conditions has been added to Section 5.2, Spread of Weeds, and Section 5.4, Vegetation. As described in these sections in the DRMPA/DEIS, under all alternatives, integrated vegetation management would be used to control, suppress, and eradicate noxious and invasive species. Under Alternatives B, C, and D, vegetation management and restoration would prioritize sagebrush re-establishment and weed control as part of habitat management. In addition, an adaptive management strategy has been incorporated as Section XX into the Final EIS that further outlines how the BLM will monitor changing vegetative conditions, including changes that may result from drought and from climate change. [NOTE TO BLM: If adaptive management strategy does not apply to this comment, please delete this sentence from the response.]

Consider revising issue statement because the reference to Beschta et al. is confusing as new literature is not included in the summary. There does not seem to be a reference to new literature in the summary yet the response references literature.

[Change to FEIS- add climate change text to section 5.2 and 5.4 as indicated above]

The reference cited, Beschta et al. 2012, reports that domestic livestock and other ungulates alter vegetation, soils, hydrology, and wildlife species composition and abundances that exacerbate the effects of climate change on western landscapes, and that removing or reducing livestock grazing across large areas of public land would alleviate a widely recognized and long-term stressor and make ecosystems less susceptible to the effects of climate change.

Assessing the impacts of grazing on vegetative resilience on public lands in light of climate change is outside the scope of this document, except as it pertains to reducing impacts on GRS and GRS habitat within the LFO planning area and in consideration of valid existing rights and the BLM's multiple use mandate under the Federal Land Policy and

n/a



Plan	Issue Statement
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OR	n/a
UT	n/a
ID- SW MT	The EIS does not adequately address the cumulative effects of climate change on sage-grouse or sage-grouse habitat, including the cumulative effects of livestock grazing on vegetation communities and the likelihood of a changing climate to result in an increase in invasive weeds.

NV- CA	The cumulative effects analysis for Climate Change needs to include additional sources and did not establish an impact analysis protocol.
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NW	n/a
CO	
Lewis town	n/a
ND	n/a
WY9	

Response	NCT Notes
n/a	
n/a	
<p>The PRMP/FEIS does disclose the potential effects associated with global climate change on the Greater Sage-grouse (Draft LUPA/EIS, page XX). However, pursuant to 40 CFR 1500.1(b), information must be "of high quality" in order to be considered in the analysis. As explained in the EIS, <del>while it is not speculative that changes in conditions will likely occur due to climate change,</del> it is speculative to attempt to predict the specific nature or magnitude of such changes. As noted on page XX,</p> <p>NOTE TO BLM: Based on the NEPA and CEQ guidance for cumulative impacts analysis, determine if the DEIS analysis is adequate or not. If not, make necessary corrections and note what was modified here. Include direction to reader where to find revised analysis (e.g., "See Section 5.XXX for additional information.").</p>	<p>Suggest using language similar to other subregions about climate change being out of scope as it directly applies to GRSG conservation.</p>
<p>NOTE TO BLM: Based on the NEPA and CEQ guidance for cumulative impacts analysis, determine if the DEIS analysis is adequate or not. If not, make necessary corrections and note what was modified here. Include direction to reader where to find revised analysis (e.g., "See Section 5.XXX for additional information.").</p> <p>BLM needs time to review the document and publications suggested.</p> <p>The BLM analysed the threats of climate change on sage grouse and needs time to review the document to see if additional analysis is required.</p>	<p>Could be addressed with other responses in sections 10.1, 10.2, or 10.3. Very possible all responses could be combined into one because all of the summaries are very similar.</p>
n/a	
n/a	
n/a	
n/a	
n/a	
n/a	





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	The Fort McDermitt Paiute and Shoshone Tribe requests a Nation to Nation and Government to Government consultation with the NV-BLM to have meaningful Consultation on matters related to Sage Grouse. The Tribe believes that there will be severe and irreparable environmental impacts from the proposed project and they have significant concerns about the proposed degradation of cultural resources and loss of traditional communities.
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

## Response

n/a

n/a

n/a

The BLM and Forest Service recognize the tribal sovereignty of federally recognized indigenous tribes as well as the laws that clarify the relationship between the federal government and Native American Tribes and the requirement to conduct consultation. The BLM and FS initiated Governemtn to Government consultation with the Fort McDermitt Paiute and Shoshone Tribe in December of 2011. In addition, they were invited to participate in the planning effort as a cooperating agency but choose not to sign a formal MOU. Formal Governemtn to Government consultation continued in 2012 with face-to-face meetings with the BLM in June and July and with the Forest Service in June and Novemeber of 2013. The BLM and FS are committed to continue formal consultation with all federally recognized Native American Tribes in the Sage Grouse conservation efforts.

n/a

n/a

n/a



Move to Section 25.I,  
Consultation requirements.

Plan	Issue Statement
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OR	The BLM must consider the impacts of proposed livestock grazing throughout the planning area on the important cultural and historic resources found on these public lands.
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UT	BLM and Forest Service failed to provide management actions that address cultural resources and areas.
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ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

Assessing the impacts of grazing on cultural resources is outside the scope of this document, except as it pertains to reducing impacts on GRSG and GRSG habitat within the planning area and in consideration of valid existing rights and the BLM's multiple use mandate under the Federal Land Policy and Management Act. The Draft EIS evaluated alternatives that would incorporate GRSG habitat objectives into BLM grazing allotments and permit renewals (Alternatives D and E) and that would remove livestock grazing from allotments in priority and general habitat (Alternative C and, to a lesser extent, Alternative F), and the associated effects these alternatives would have on GRSG and GRSG habitat. The BLM considered a reasonable range of alternatives as relates to grazing during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. The analysis presented in the EIS will allow decision makers to make an informed decision pertaining to the effects of differing livestock grazing scenarios on GRSG and its habitat. Therefore, impacts of livestock grazing on the cultural and historic resources within the planning area is not analyzed in this planning effort.

The BLM regulations in 43 CFR 1600 and the NEPA process detailed in the CEQ regulations in 40 CFR 1500 guide preparation of plan amendments. As stated in Section 1.2, the purpose for the LUP amendments is to identify and incorporate appropriate conservation measures in LUPs to conserve, enhance and/or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat. Because this LUP Amendment is a targeted amendment to conserve GRSG, the alternatives in the DEIS included management actions for resource programs that could conserve GRSG and its habitat. Impacts to local customs and culture are analyzed in Section 4.22. Social and Economic Impacts. of the DEIS.

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR	The tribes do not have the resources or any aid from the federal government to protect Greater Sage-Grouse habitat on the Reservations. The Greater Sage-Grouse plays an important role in Native American
UT	BLM and Forest Service needs to update the cultural section to include a statement that the majority of cultural resources inventory has been associated with energy development projects.

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

The BLM has revised chapter 3 to state that Fort McDermitt Paiute and Shoshone Tribe of Nevada and Oregon and Burns Paiute have identified sage grouse as important to their culture. Land management on Tribal Reservations is not within the scope of the project. See Purpose and Need.

No cultural resource inventories were undertaken as part of this LUPA. Information from broad-scale assessments was used to help set the context for the decision-making process. As stated in Section 4.1.1.1, Methods and Assumptions, (DEIS, page 4-160) the information on cultural resources in the planning area is based on the results of industry, BLM, and Forest Service inventory projects and depicts the relative potential for cultural resource sites within the planning area. However, as these data are geographically biased toward past project-oriented undertakings and cannot accurately predict where and how many resources may exist in unsurveyed areas, this analysis does not attempt to quantify affected resources.

n/a

n/a

n/a

n/a

n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

Non-substantive comment,  
remove from this section.

Plan	Issue Statement
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OR	n/a
UT	The EIS failed to include the impacts on modern cultural resources that qualify as historic properties during the life of the plan from sage grouse management actions.

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9



## Response

n/a

As stated in Section 4.11.1, Methods and Assumptions, (page 4-160) potential impacts on cultural resources and their settings from subsequent undertakings (implementation of the planning decisions or site-specific project proposals) require separate compliance with NEPA and Section 106, and result in the continued identification, evaluation, and mitigation of cultural resources to the National Register of Historic Places. Per the Utah Protocol and standard BLM and Forest Service operating procedures, effects on cultural resources eligible for listing in the National Register of Historic Places and potentially eligible cultural resources would be mitigated. If previously undiscovered resources are identified during an undertaking work would be suspended while the resource is evaluated and mitigated to avoid any further impact

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	<p>The BLM needs to conduct a NEPA analysis complete with impacts and cumulative effects analysis of the Greater Sage-Grouse Wildfire and Invasive Species Habitat Assessments that was cited in Appendix H.</p> <p>The BLM should not use prescribed fire in low elevation areas where there is the potential for cheatgrass invasion.</p>
UT	n/a
ID-SW	n/a
MT	
NV-CA	<p>The best way to provide for the species, at least in the short to intermediate term, is to protect the remaining existing habitat because restoring degraded or fragmented sage grouse habitat is difficult and expensive and may take centuries to achieve a complete restoration of a functioning system. The preferred alternative must include provisions for habitat restoration and methods to procure the funding to complete the projects. There is a need for active management in tree removal because without disturbance, woodlands will continue to expand, mature, and close. Prioritize restoration in seasonal habitats that limiting sage-grouse distribution and/or abundance and where factors causing degradation have already been addressed. Where it will achieve sage grouse habitat</p>
NWCO	BLM needs to follow all current applicable policy and guidance documents related to wild fire, including WO IM 2013-128.
Lewisto	n/a
wn	
ND	n/a
WY9	

## Response

The assessments in Appendix H will be analyzed in the FEIS. Site assessments and NEPA review will be conducted for specific projects. Appendix H, Greater Sage-Grouse Wildland Fire and Invasive Species Assessment, describes a minimal framework example and suggested approach for this assessment.

Before using prescribed fire, the BLM assess local conditions for potential invasive plant invasion. Section 4.6.2, Nature and Types of Effects, notes that while prescribed fire does have beneficial uses, the presence of noxious weeds and the potential of weeds to spread after a prescribed fire would need to be monitored on a site-specific basis. Alternative E specifically notes that prescribed burns should occur at higher elevation in the absence of cheatgrass. If the BLM were to use prescribed fire, the area would be monitored with the intention of preventing cheatgrass invasion

[BLM note: BLM to ask Lauren M. when the Greater Sage-Grouse Wildfire and Invasive Species Habitat Assessments will be

n/a

n/a

- Active and Passive fire management-varies based on a site specific basis and specific variables in that area. Add reference to veg and fire/fuels ch 2 management actions that refer to the FIAT assessment/prioritization process for suppression, and veg/fuel treatments.
- Refer to Action D-FFM-19 [globally replace with new proposed action reference] in Table 2.4 for provisions for habitat restoration.
- Reference Table 2-4 Action D-FFM-HFM-3 which discusses full range of fuel techniques which include active and passive restoration.
- Prescribed burns- page 4-68-
- Alternative B (NTT Alternative) Do not use burning in less than 12 inch sage brush.
- In conjunction with NRCS, BLM has allocated specific funding specific for sage grouse habitat restoration and protection.
- Action D-Veg I addresses the management of Juniper/conifer encroachment and Action D-FFM-19 in Table 2.4 addresses management of invasives.-Woodlands threaten sage grouse because these habitats do not support sage grouse.

The BLM did consider IM 2013-128 in the EIS development; and the BMPs from the IM were included in the Draft EIS and have been analyzed in the PDF/RDF Appendix.

n/a

n/a

Delete this from here. The comments (it's not an issue statement) is all about alternatives so move it to section 12.1. This section (12.0) is specifically for fire policy/reg type comments. See issue under NWCO.

Plan	Issue Statement
OR	<p>1. The RMPA/DEIS does not analyze wildfire management in a manner that fulfills the purpose and need of the document. The Greater Sage-Grouse Wildland Fire and Invasive Species Assessment noted in the Preferred Alternative needs to be completed and included in the RMPA/DEIS.</p> <p>2. The BLM failed to analyze the role of Rangeland Fire Protection Districts. According to FLPMA the BLM needs to coordinate with these associations and the BLM should better evaluate the benefits of this coordination. The BLM should also share wildfire risk assessment information with cooperating agencies and Rangeland Fire Protection Associations.</p> <p>3. The BLM needs to ensure fire response time is minimized and needs to be careful not to close or restrict the construction of new roads that could enable firefighters to have the quickest response time. The RMPA/DEIS needs to include decision-making priorities for fires that extend across BLM districts and jurisdictions.</p>
UT	<p>Commenters included information about the inclusion of fire in the disturbance cap and the effects of fire on sagebrush availability. Additionally, commenters questioned the use of various treatment types such as prescribed fire in GRSG habitats and appropriateness of best management practices.</p>

ID-SW MT The BLM and the Forest Service should examine the location and size of proposed fuel breaks in further detail as fuel breaks in large areas of intact sagebrush limit fire and related habitat destruction. Specifically, one commenter requests use of green-strips, including non-native species, for fuel breaks. Use of prescriptive fire as a management tool should be further examined. The FEIS should consider the quality, sustainability, or relative importance of habitat to GRSG when determining whether it is appropriate to maintain the 15% sagebrush canopy in key/core habitat. Timelines for long-term fire management measures should be established in the FEIS. One commenter recommends that measures be implemented one year after the ROD. Implementation details of fire control measures should be specified. The BLM/Forest Service should acknowledge the importance of flexibility in fire management plans in the FEIS and allow for on-the ground decision making for effective fire-management. Alternative language should be

NV-CA The management action should apply to brood rearing and winter habitat as well as nest habitat. ~~It may not be appropriate to maintain 15% sagebrush canopy in all key/core habitat in an area where removal and creation of a fuel break would have net beneficial effects on GRSG.~~ Clearly define how readjustment of resources to provide suppression for Sage Grouse habitat would be coordinated with the local fire departments. Nevada Rural Electric Association requests the flexibility to fight wildfire that threaten their infrastructure within authorized ROWs and requests

NWCO BLM needs to modify the alternatives for fire management actions to 1) not count habitat loss due to wild fires in the disturbance cap; 2) not place protection of the sage-grouse over protecting life and property; and 3) include additional conservation measures to alternatives, such as not reduce canopy cover to less than 15% on all ADH, apply appropriate seasonal restrictions to all ADH, and include a risk analysis, for a prescribed

Lewisto Commenters requested the following  
wn 1/1 alternative modifications: that no prescribed burning be allowed in PH and GH or if allowed, that it should only be allowed on a case-by-case basis if it can be shown that impacts are neutral or beneficial to GRSG; that treatment of sagebrush habitat be a last alternative for fuels management; and that the FEIS explain why prescribed burning in GRSG habitat is included in the preferred alternative if it is not currently practiced.

Appropriate grazing should be recognized in the RMPA as a primary tool in the prevention of wildfire and reduction of invasive weeds—two of the primary threats

ND 1/1 The BLM should consider the elimination of prescribed fire in all action alternatives.

WY9

## Response

1. The assessments in Appendix H will be analyzed in the FEIS. Site assessments and NEPA review will be conducted for specific projects. Appendix H, Greater Sage Grouse Wildland Fire and Invasive Species Assessment, describes a minimal framework example and suggested approach for this assessment. As noted in section 4.3, NEPA Range of Alternatives, of this report, the alternatives, including the management actions for the fire program meet the purpose and need for the EIS. Additionally, the Greater Sage-grouse Wildland Fire and Invasive Species Assessment, which provides a framework for site assessments, was updated and finalized. See Appendix XX of this FEIS. The assessments will be conducted during implementation of the planning decisions from the ROD.

2. BLM coordinates with RFPAs, rural fire protection districts, and state/Tribal partners for improved fire management actions, such as initial attack. To facilitate safety, efficiency, effectiveness, all partners must meet minimum training and equipment standards.

[BLM note: Response needs wordsmithing by BLM. This comment will result in changes to the DEIS.]

3. New roads can fragment habitat, can increase human-caused fires, and can facilitate weed invasion. The BLM seeks to find a balance between roads used for fire response, public access, and protecting natural resources.

4. Juniper is not a noxious weed or invasive plant. Fire and vegetation management coordination occurs in order to manage fuels.

[BLM note: BLM to place fuels management for invasives, juniper, fire risk (e.g. fuels breaks) in the vegetation section of alternatives matrix.]

5. The design and location of fuel breaks and fuels treatments are analyzed for site-specific projects. Prescribed fire and grazing are considered at various intensities in the alternatives. The Vegetation section of Table 2-6 contains an action for seed sources with respect to climate change.

The BLM and the Forest Service considered a reasonable range of alternatives during the GRSG planning process in full compliance with the NEPA (see section 4.3, NEPA Range of Alternatives, of this report, as well as Chapter 2 of the FEIS). The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and GRSG in the planning area, the BLM and the Forest Service fully considered the the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/DEIS that best addressed the issues and concerns identified by the affected public.

The DLUPA/DEIS considered a range of alternatives. Within that the range of alternatives fire is included as disturbance under Alternative C and E. Fire is not counted as disturbance under alternatives B or D. Under the proposed plan fire would not be counted as disturbance but would be taken into consideration when evaluating habitat availability-percent sagebrush on the landscape. The EIS also considers a range of alternatives considering use of prescribed fire within priority management areas and use of certain best management practices.

The BLM has provided Monitoring and Adaptive Management strategies in the FEIS, see Appendices XX and XX. The strategies provide a framework would be put in place to account for habitat losses due to natural causes (fire and invasives) and/or population declines at the appropriate localized scale. [NOTE TO BLM: Are adaptive management strategies being

The BLM and the Forest Service considered a reasonable range of alternatives during the GRSG planning process in full compliance with the NEPA (see section 4.3, NEPA Range of Alternatives, of this report, as well as Chapter 2 of the FEIS). The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/DEIS that best addressed the issues and concerns identified by the affected public.

The DEIS management actions in Table 2-2 provide for a range of level of use of fuel breaks, including use of green-strips. The fuels RDFs under Alternatives XX do not exclude the use of non-native species for fuel breaks. These RDFs will be adopted in the preferred alternative [ensure language is correct for RDFs]

Management actions for prescribed fire will be modified in the preferred alternative to include restricting use of prescribed fire in intact Wyoming sagebrush [Need to make sure changes are added to FEIS, add reference to appropriate section here]. [Need input from sage-grouse team in relation to 15% canopy cover language changes]

This FEIS/RMPA is intended to direct planning level actions. Timelines and details for implementation will be specified in future site specific planning efforts.

Alternative language will be reviewed and revised for clarity as needed.

- Prescribed mitigation came from action B-FFM-HFM-9 (NTT Report) and action F-FFM-HFM-9. See action B-FFM-HFM-9. Alternative D has implementation actions which are tiered to the local GRSG landscape wildfire and invasive species assessment described in GEN-1 [replace with new management action code] utilizing best available science related to the conservation of GRSG.
- Coordinate and collaborate with federal, tribal, state, local governments, as well as associations sanctioned through either California or Nevada states that meet fire standards for effective and efficient wildfire response.



The BLM took into account the recommendations made from the cooperating agencies as well as the input provided by the public. This information was reviewed for content against the current range of alternatives. The recommendations were found to fall within the range of alternatives. Additional coordination with cooperating agencies between the Draft EIS and Final EIS resulted in changes which are presented in the FEIS (see *Section XXX of the FEIS*).

Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives (see section 4.3, NEPA Range of Alternatives, of this report). ~~The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.~~

Alternative D would allow management actions, including prescribed fire, to occur where they are most beneficial to GRSG as detailed in site-specific analysis, if site specific NEPA analysis shows that a prescribed burn would benefit GRSG, then a plan amendment would not be required to allow the project.

Section 4.5.2, Nature and Types of Effects in the Wildland Fire Management and Ecology section states, "Range grazing management can impact the ability to manage fire as a natural process through changes in fine fuels availability (e.g., grasses). Livestock grazing reduces fuel loads, so retiring allotments may lead to increased fuels in site specific locations. Conversely, increasing AUMs could reduce fuel loads." The effects of grazing on wildland fire risk for each alternative is included in Prescribed fire is a necessary tool and to remove prescribed fire as a tool would take away the option of ignition for slash piles, including burning conifers that are removed and piled. Also, removal of prescribed fire would not make it possible to utilize prescribed fire for silver sage management. Silver sage responds positively to fire, unlike Big Sage. In addition prescribed fire may be needed for potential riparian management. The use of prescribed fire is not being eliminated in the alternatives because it can be used to benefit GRSG (i.e., when reducing conifers to benefit GRSG habitat, pile burning is a beneficial tool). Any fuels projects would only be approved if they would meet the goals and objectives for GRSG.

NOTES from NCT: based on info in responses, many of these points sound out of scope for the P/N.

1. Response doesn't answer the point. Reference back to the P/N response in Section 4.3 of this workbook and that fire actions are appropriate for the P/N. Assumed that the noted Assessment is the same as the FIAT report, so new language reflects that FIAT was updated and final version is in Ap. XX in FEIS.

2. is not part of the alternatives discussion. Suggest moving out to 12.4 (cum impacts) as the issue notes the failure to analyze. Response could include statement that coordination is known to benefit both agencies, and the cooperation was part of the NEPA & planning processes. Probably doesn't require update to the FEIS cum analysis section.

3. More about coordination and implementation actions, not the planning level actions considered in the EIS. Out of Scope. If want to discuss fire coordination as an issue, suggest moving it to 12.0.

4. Also about coordination, not alternatives. Move to another section, possibly 12.0 where it can be addressed more generally. Second part is hinting at monitoring, so either move issue/response to Mitigation section (12.5) or cross reference to that. Can direct reader to the new Mitigation, Monitoring & AM strategy appendices, as well as cross reference to section 7.9 of the comment report where these will be discussed in detail.

struck out sentences in issue statement are opinion and should not be included. Last 2 sentences in issue statement are about coordination - suggest moving them out to section 12.0 (they don't fit with alternatives).

Good issue & response language. Other areas should consider using it to respond when suggested commenter alts/actions are not warranted.

Plan	Issue Statement
OR	The RMPA/DEIS does not address or analyze the significant role that ranchers and Rangeland Fire Protection Associations play in wildfire control. Also, grazing should be recognized in the RMPA/DEIS as a primary tool in the prevention of wildfire and invasive weed reduction.
UT	The DEIS failed to include citations indicating that implementation of fuel breaks in sagebrush systems where herbaceous forage remained reduce the ignition potential or spread of fire.
ID-SW MT	The FEIS should include citations indicating that implementation of fuel breaks in sagebrush systems reduces the rate of spread of fire. In addition, citations should be provided to support the use of prescribed fire to improve GRSG habitat. The BLM and Forest Service should recognize livestock grazing as an effective fire management tool due to its role in controlling invasive plants and decreasing fuel loads.

- NV-CA
- ~~1. An economical and efficient way to remove excess grass is with an on-off grazing system.~~
  - ~~2. The BLM fails to cite literature describing the use of fire breaks to slow or reduce effects of wildfires.~~
  - ~~3. Commentors suggested additional references which should be considered in the EIS.~~
  - ~~4. We strongly encourage the BLM to cooperate with UNR and begin to demonstrate these positive effects throughout the DEIS planning area.~~
  - ~~5. Clarify what will be used for the base line to determine improved ecological conditions.~~
  - ~~6. The fire return interval is much longer than stated in the EIS.~~

Commenters suggested that BLM needed to support their information in the affected environment chapter with additional references. Commenters also provided several new/additional references that BLM

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

RFFPA coordination will be included in the Proposed Plan. Analysis of the role that RFPAs play in wildfire control cannot be analyzed because data are not available involving RFPAs that meet National Wildfire Coordinating Group standards.

[BLM note: This response will result in new text for the Proposed Plan. Needs wordsmithing by BLM.]

Grazing does not prevent wildfires. However, grazing can modify fire behavior and effects. Language in Chapter 2 will be clarified to identify that targeted grazing is a biological tool for vegetation management.

[BLM note: This response will result in new text for the Proposed Plan.]

Fuel breaks are not intended to eliminate the possibility of fire ignition or fire spread. A fuel break is intended to be used in conjunction with firefighters as a control line for fire suppression. They are designed to interrupt the continuity of heavy fuels which decreases fire behavior and/or slows fire spread, providing more opportunities for safe fire suppression. A proper fuel break should be maintained periodically to ensure the efficacy of the break. BLM Utah closely monitors the effectiveness of fuel breaks and larger fuels treatments, and documents successful interactions with wildfire in the Fuels Treatment Effectiveness Module. Research supports the idea that coupling fuel breaks with area-wide fuel treatments can reduce the size, intensity, and effects of wildland fires (2000, Agee, J. K.; Bahro, B.; Finney, M. A.; Omi, P. N.; Sapsis, D. B.; Skinner, C. N.; van Wagtenonk, J. W.; Weatherspoon, C. P. The use of fuel breaks in landscape fire management. *Forest Ecology and Management*, 127: 55 – 66). Additional information has been added to FEIS in Chapter 4 discussing the purpose. **The EIS affected environment section provides the appropriate information for the scope and scale of the project (see section 4.4, NEPA Baseline Information of this report). However, upon BLM and Forest Service reviews and public comment suggestions, some sections in Chapter 3 have been updated and revised to include clarifications or new information. Section 3.XX, [insert section name], in the FEIS has been revised to update information regarding fuelbreaks and section 3.XX, [insert section name], has been updated to clarify the relationship between livestock grazing and fire. The following language has been added to Chapter 3 address fuelbreaks:**

~~A fuelbreak is defined as a strategically located wide block, or strip, on which a cover of dense, heavy, or flammable vegetation has been permanently changed to one of lower fuel volume or reduced flammability, as an aid to fire control. The treatment objective may also be a permanent change to a new vegetation cover. (Green 1977). This 1977 report summarizes more than 17 years of the program's experience. Type—converting the land to grassland and then managed grazing and browsing by goats was recommended for long—term maintenance of the fuel—break system. The effectiveness of fuelbreaks remains a subject of debate within and outside of the fire management community. There are many reasons for this broad range of opinion, among them that objectives can vary widely, fuelbreak prescriptions (width, amount of fuel reduction, maintenance standards) may also vary, they can be placed in many different fuel conditions, and may be approached by wildland fires under a variety of normal to extreme weather conditions. Furthermore, fuelbreaks are never designed to stop fires but to allow suppression forces a higher probability of successfully attacking a wildland fire (Agee et al 2000.)~~

~~Green, L.R. 1977. Fuelbreaks and other fuel modifications for Wildland fire control. USDA Agricultural Handbook 499, 79p. 2000, Agee, J. K.; Bahro, B.; Finney, M. A.; Omi, P. N.; Sapsis, D. B.; Skinner, C. N.; van Wagtenonk, J. W.; Weatherspoon, C. P. The use of fuel breaks in landscape fire management. *Forest Ecology and Management*, 127: 55—66 Targeted grazing was included in the alternatives as a tool for fire management, as long as in compliance with ID Standards and Guidelines. The following has been added to Ch 3 to clarify the relationship between livestock grazing and fire:~~

~~There are several ways that contemporary livestock grazing practices can affect the extent and severity of fires in sagebrush dominated ecosystems, including cumulative effects that occur on decadal time scales to alter plant community composition and those observed as yearly changes in fuel loads. Livestock grazing can change the relative proportions of shrubs, perennial grasses, and annual grasses over decades, altering the fuel composition. On an annual basis, grazing can reduce the amount of herbaceous fine fuels, including cheatgrass, forbs and small twigs of woody plants. Grazing can reduce fire spread and~~

The EIS affected environment section provides the appropriate information for the scope and scale of the project (see section 4.4, NEPA Baseline Information of this report). However, upon BLM and Forest Service reviews and public comment suggestions, some sections in Chapter 3 have been updated and revised to include clarifications or new information. Section 3.XX, [insert section name], in the FEIS has been revised to include additional reference support to the information presented; section 3.XX [insert section name] was revised to clarify criteria used for baseline and improved ecological condition assessment; section 3.XX etc.

Additionally, Of the suggested studies and references put forth by the commenters, the BLM and Forest Service reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...

- ~~Refer to management of Livestock Grazing. Grazing is a management strategy which is discussed in the grazing portions of the document. Refer to Management Action D-FFM-HFM-3.~~
- ~~The BLM has added language to Chapter 4 – Wildland Fire Nature and Types of Effects to address fuel breaks per Agee et al. (2000), Stratton (2004), Finney (2007), Finney et al. (2007), and Alexander et al. (2004)~~
- ~~The BLM is reviewing additional references which will be considered and incorporated in the references as necessary.~~
- ~~The BLM actively coordinates with UNR and other universities through the Great Basin Consorsium, the Missula Fire Lab, joint fire science, and the USGS.~~
- ~~The BLM does need to clarify criteria used for baseline and improved ecological conditions. The management strategies used to determine baseline ecological conditions are consistent with those used in Miller et al (2013), WAFWA, etc. Can be found in Table 2 of Resilience to stress and disturbance and Resistance to Bromus tectorum L. Invasion in Cold Desert Shrublands of Western North America.~~
- ~~Added table in Ch 3 with the different sage species and PJ fire return interval with citations from FEIS. FEIS citations refer to Big sage as having a FRI of 15 – 25 years for presettlement and 15 – 40 years post settlement. [BLM follow up on specific~~

n/a

n/a

n/a



Instead of including here the actual language that was modified in the FEIS, reference where the reader can find it in the FEIS. See red text.

Modified summary statement  
and response (see red text).

1 = opinion, delete (unless the  
commenter is actually saying  
that the baseline is wrong and  
includes rationale).

2 & 3 = became the revised  
issue statement

4 = cooperation can be moved  
to 12.0 where other  
subregion's have delt with the  
same issue.

5 = implementation doesn't  
need to be covered here  
(affected enviro section).

delete (commenter/reader will  
find the same info in the  
mitigation & montioring  
sections of this report)

6 = opinion. delete (unless the  
commenter is actually saying  
that the baseline is wrong and  
includes rationale.)

Plan	Issue Statement
OR	<p data-bbox="235 184 735 415">Commenters noted that BLM and Forest Service did not provided adequate analysis for how the disturbance cap could hamper wildfire response and the impacts from BLM coordiantion with the Rangeland Fire Protection Associations.</p> <p data-bbox="235 426 735 615"><del>The 3% disturbance cap hampers the ability to quickly respond to wildfire and the impact of the disturbance cap on wildfire suppression efforts was not adequately analyzed.</del></p> <p data-bbox="235 625 735 814"><del>The DEIS should include fire in the Preferred Alternative 3% cap on anthropogenic disturbances and in any other percentage limits on anthropogenic disturbance, as was recommended by USFWS.</del></p> <p data-bbox="235 825 735 930"><del>The RMPA/DEIS should evaluate the impacts of coordination with the Rangeland Fire Protection Associations and coordination</del></p>
UT	<p data-bbox="235 951 735 1098">Commenters suggested that Alternative D should be revised to meet the COT objectives for fire.</p>
ID-SW MT	<p data-bbox="235 1098 735 1446">The DEIS does not contain sufficient analysis of indirect impacts of reduced grazing on fuel loads and related wildfire risk. Additionally, the analysis of impacts of fire suppression activities should be reexamined. It is particularly important that this analysis is clarified as lack of sufficient regulatory mechanisms for wildland fire was cited as a primary threat to GRS in the EWS listing</p>

- NV-CA 1. Resolve the discrepancy in Ch.4 at 109 claiming between 1992 and 2011 human-caused-fires resulted in the loss of 305,076 acres. This is inconsistent with the acreage BLM reports in Chapter 3 at 75 which indicates that 198,691 acres burned due to human caused ignitions between 1992-2011.
2. Constructing livestock enclosures around post-fire recovery areas is impractical for large-burn areas.
3. Placing more limitation on mineral development will not indirectly decrease risk of fire; this assumptive unsubstantiated statement and should not be include in the FEIS/LUPA document.
4. The statement "Federal Ownership" should be corrected the federal government doesn't own the land.
5. Clarify how the elimination of cross-country travel will show significant changes in human caused ignition or a reduction of invasive grasses.

NWCO Commenters noted that the assumptions for the fire impacts analysis were flawed and requested BLM to include a strategy for identifying sagebrush landscapes that are at risk from fire in order to avoid conversion of landscapes to being dominated by invasive species.

ND n/a  
WY9

## Response

Responding to a wildfire is unrelated to a disturbance cap. RFPA coordination will be included in the Proposed Plan. Analysis of the role that RFPAs play in wildfire control cannot be analyzed because data are not available involving RFPAs that meet National Wildfire Coordinating Group standards.

[BLM note: This response will result in new text for the Proposed Plan. Needs wordsmithing by BLM.]

As indicated by the USFWS COT evaluation, many of the measures recommended are currently included within the preferred alternative in the DLUPA/DEIS. In addition, many of these measures are already used by the BLM as part of standard fire management policy and procedures. Specific language that states GRSG must occupy an area for restoration to be considered successful is included in the range of alternative under alternative C.

The impact analysis provides the appropriate information for the scope and scale of the project (see section 4.6, NEPA Impact Analysis, of this report). Upon BLM and Forest Service reviews and public comment suggestions, some sections in Chapter 4 have been updated and revised to include clarifications to the text. Section 4.XX, [insert section name], in the FEIS has been revised to clarify the impacts of reduced grazing on fuel loads. [BLM/Forest Service- need to add review impacts in Ch 4 for consistency with this language added to chapter 3 for relation between grazing and fire. .Review impacts analysis to make sure that impacts analysis has sufficient info on impacts of reduced grazing on fuel loads]

In addition, impacts analysis discussion has been modified to clarify the impacts of different suppression measures proposed by Alternative.[BLM/Forest Service- need to review and modify discussion of impacts of fire suppression measures (i.e. specific conservation measures under B vs. approach under F)]

- The discrepancy in Chapter 4 at 109 has been noted and changes will be made in Chapter 3 & 4 as needed.
- Mineral reduction (page 4-127) -This assumption is based on Shlisky et al 2007 which shows a correlation between mining and risk of wildfire by introducing new ignition sources.
- The term "Federal Ownership" should be changed to federally managed lands in the document.
- See Human Caused fires in the Impacts from Recreation Management in Section 4.8.3 on page 4-129.
- Impacts from Alternative E would be less than that of Alternative A because not more than five percent of the occupied and suitable and 20 percent in potential habitat would undergo habitat disturbance. This in turn will cause a shift in Condition Class to a more historical regime. (from 4.8.8 Impacts from greater sage-grouse management)
- Table 2.6 states fuel loading requirements and fuel loading is covered in the Chambers assessment table and FIAT assessment.

The DLUPA/EIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.7.2 of the Draft EIS). **As noted in section 4.6, impact analysis, of this report**, the methodology and assumptions provide an adequate starting point for discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. ~~As required by 40 CFR 1502.24, the DLUPA/EIS identified methodologies used and made reference to the scientific and other sources relied upon for conclusions in the analysis. Based on these methodologies and assumptions, the DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.~~

In regards to the request for a fire strategy, land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions, such as developing local fire and weed management strategies. Any future site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is

n/a

n/a



changed the summary statement to keep it to the relevant information.

1 & 3 became new issue statement.

2. opinion/vote counting - deleted

Suggest changing the response for why didn't analyze coordination to something like "it's not required by NEPA" or that it's "part of the NEPA process, and not something that needs to be analyzed."

this is range of alternatives.

Delete from here and put into

12.1 section (range of alts).

First point is a tech edit and doesn't need to be noted in the issue/response.

Second issue statement is opinion. Delete

Fourth issue is a tech edit. Delete from here.

Point 6 can be answered with a simple reference to where the reader can find the information in the FEIS.

Plan	Issue Statement
------	-----------------

OR	The BLM failed to complete the fire and invasive species assessment for each district as outlined in Vol. 3 of the Draft RMPA, Appendix H.
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The cumulative impact analysis did not discuss fine fuel buildup or increased weeds from reduced grazing, the potential impacts of the Holloway and Miller Homestead ES&R, or the possibility of fires that burned across the Nevada border and the potential impacts fire management in Nevada could

UT	n/a
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ID-SW	n/a
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MT	
----	--

NV-CA	n/a
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NWCO	n/a
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Lewisto	n/a
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wn	
----	--

ND	n/a
----	-----

WY9	
-----	--

## Response

The assessments in Appendix H will be analyzed in the FEIS. Site assessments and NEPA review will be conducted for specific projects. Appendix H, Greater Sage-Grouse Wildland Fire and Invasive Species Assessment, describes a minimal framework example and suggested approach for this assessment.

ES&R successes/failures take 5-10 years to determine.

The cumulative impacts section for Alternative B briefly touched on fuel buildup due to reduced grazing in noting the restrictions could result in higher fuel loads and more intense fires. The other alternatives will be revised to discuss the cumulative impacts of reducing grazing. Reasonably foreseeable future actions, such as the Holloway and Miller Homestead ES&R, are not actual planning decisions.

[BLM note: BLM to identify how this will change the DEIS.]

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	The fuel and fire management RDFs need to be more specific.
UT	n/a
ID-SW	n/a
MT	
NV-CA	Emergency response to wildfires should be included in the plan and should include the use of air tankers. Additionally, the Rangeland Fire Protection Association model should be applied to all LUPA/DEIS
NWCO	n/a
Lewisto wn I/I	Commenters requested that mitigation and monitoring be clearly listed and discussed in the FEIS.
ND WY9	n/a

## Response

The RDFs are kept more general so that they can be applied more widely to various situations. The flexibility would be lost were they made more specific. Changes in Proposed Plan will add specificity where possible.

n/a

n/a

Note to BLM: Remove the word "heavy" from the term "heavy air tankers" to "air tankers" to resolve issue. BLM should look into the Rangeland Fire Protection Association model.

- Emergency response is addressed in the document. TMA-311 and FFM-HFM-45 alternative E addresses the air tanker issue.

n/a

The BLM has drafted a monitoring framework that is included in the Proposed RMP Amendment/FEIS as Appendix X. The appendix describes the process that the BLM will use to monitor implementation and effectiveness of RMP decisions. The monitoring framework includes monitoring at various scales specific to GRSG habitat, consistent indicators to measure and metric descriptions for each of the scales, analysis and reporting methods, and the incorporation of monitoring results into adaptive management. The need for fine and site-scale specific habitat monitoring will vary by area depending on existing conditions, habitat variability, threats, and land health. To accomplish effectiveness monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes. [NOTE TO BLM: revise response if necessary based on new monitoring

n/a

If making specific edits, suggest simply noting that "BLM has clarified Section XX.XX in response to comments regarding air takers."

Not sure how this belongs in the fire section. Suggest clarifying the fire connection in the issue statement & response, and including a cross reference to the mitigation/monitoring response (either 4.9 or 7.9).



Plan	Issue Statement	Response
OR	n/a	n/a
UT	n/a	n/a
ID-SW	n/a	n/a
MT		
NV-CA	Adequate predator control measures need to be undertaken to limit predator populations as part of this decision.	Look for National Response and add the following: Predator control is outside the scope of this decision. Predator control will be conducted according to BLM and Forest Service policy and agreements with APHIS and state agencies. Consider adding monitoring as a management action under predation
NWCO	n/a	n/a
Lewiston	n/a	n/a
WY9		
ND	n/a	n/a

Predation is discussed and responded to in section 32.1 of this workbook. Suggest moving this section to 32.1.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	1. The BLM fails to address avoiding the potential to list the GRSG under the Endangered Species Act (ESA) and that the bird does not meet the criteria to be listed under the ESA.
MT 1/2	2. The DRMP does not provide detailed objectives, timeline, or scientific parameters for monitoring the implementation of the RMP and evaluating the progress towards conserving the GRSG.

ID-SW  
MT 2/2

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

n/a

1. As stated in Chapter 1, Section 1.1, Background in the DRMP, this plan amendment effort is the result of the July 2011, BLM National Greater Sage-Grouse Planning Strategy (BLM 2011). The Strategy responds to the March 2010, US Fish and Wildlife Service (USFWS) 12-Month Finding for Petitions to List the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered (75 Federal Register [FR] 13910, March 23, 2010) (2010 Finding). In the 2010 Finding, the USFWS concluded that GRSG was “warranted, but precluded” for listing as a threatened or endangered species. The “precluded” determination for the sage-grouse listing was because the listing other species was a priority. The USFWS reviewed the status and threats to GRSG in relation to the five Listing Factors provided in Section 4(a)(1) of the Endangered Species Act (ESA). Of the five Listing Factors reviewed, the USFWS determined that Factor A, “the present or threatened destruction, modification, or curtailment of the habitat or range of the Greater Sage-Grouse,” and Factor D, “the inadequacy of existing regulatory mechanisms” posed “a significant threat to the Greater Sage-Grouse now and in the foreseeable future” (USFWS 2010). The USFWS identified the conservation measures in LUPs as the principal regulatory mechanisms for the BLM and Forest Service.”

In the 2010 Finding, the USFWS identified the conservation measures in LUPs as the principal regulatory mechanisms for the BLM and Forest Service. In response to the USFWS findings, the BLM and Forest Service intend to prepare plan amendments with associated Environmental Impact Statements (EISs) to incorporate specific conservation measures across the range of the GRSG, consistent with national BLM and Forest Service policy. The planning strategy will evaluate the adequacy of BLM and Forest Service LUPs and address, as necessary, amendments throughout the range of the GRSG. The BLM and Forest Service are responsible for managing the habitat for which the GRSG inhabits. A Notice of Intent was published in the Federal Register (December 9, 2011) to initiate the amendment of LUPs across nine western states, including the Idaho and Southwestern Montana Sub-Region. The ID/swMT Plan Amendment and EIS is one of fifteen separate EISs that are currently being conducted to analyze and incorporate specific conservation measures across the range of the GRSG, consistent with National BLM and Forest Service policy. A goal of all such LUPAs is to ensure consistency of goals objectives and management actions, to the extent practicable, across the region, as well as across the range of the GRSG. Implementing the “no action” alternative would allow current management actions to continue and would likely result in listing the species as threatened or endangered therefore requiring the USFWS to implement species conservation actions and policies to protect

2. The BLM has drafted a monitoring framework plan that is discussed within the Draft Resource Management Plan Amendment/ EIS in Chapter 2, Section 2.2.3, Brief Description of the Action Alternatives which is included in Appendix E, Greater Sage-Grouse Draft Monitoring Framework Plan. Appendix E describes the process that the BLM will use to evaluate the implementation and success of the BLM and USFS land use plans in maintaining and restoring habitat conditions necessary to support sustainable GRSG populations. Monitoring data will also be used to help inform adaptive management under these plans and meets the requirements under the Policy for Evaluation of Conservation Efforts When Making Listing Decisions (PECE) (50 CFR Vol. 323 68, No. 60). The monitoring framework includes monitoring at multiple scales specific to GRSG habitat, consistent indicators to measure and metric descriptions for each of the scales, analysis and reporting methods, and the incorporation of monitoring results into adaptive management. The need for fine and site-scale specific habitat monitoring will vary by area depending on existing conditions, habitat variability, threats, and land health. To accomplish effectiveness monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

The BLM and Forest Service are currently in the process of finalizing a Monitoring Framework which will be included in the Proposed RMP Amendment/FEIS. The Monitoring Framework will describe the process that the BLM and Forest Service will use to monitor implementation and effectiveness of LUP decisions and will include: methods, data standards, and intervals of monitoring at broad and mid scales; consistent indicators to measure and metric descriptions for each of the scales; analysis and reporting methods; and the incorporation of monitoring results into adaptive management. The need for fine and site scale specific habitat monitoring may vary by area depending on existing conditions, habitat variability, threats, and land health. Indicators at the fine and site scales will be consistent with the Habitat Assessment Framework; however the values for the indicators could be adjusted for regional conditions.

[NOTE TO BLM: A new monitoring framework and response language is being drafted by the national team. This section will  
n/a

n/a

n/a

n/a

Both issue statements may be addressed in SG sections (the 7 tabs). Suggest reviewing the responses in tabs 7.X with this response to see if there is any redundancy or need to streamline the responses.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
------	-----------------

OR n/a

UT n/a

ID- n/a

SW

MT

NV- Intensive Sage Grouse management may have

CA unintentional effects from other species  
outside of PPH/PGH.

NW n/a

CO

Lewis The BLM should provide additional references  
town to support the impact conclusions for other  
special status species.

ND n/a

WY9

Response

NCT Notes

n/a

n/a

n/a

BLM and Forest Service have discussed this topic in Chapter 3.5 (Fish and Wildlife and Special Status Species) in the LUPA/DEIS. This topic will also be addressed through the development of a Biological Assessment for Section 7 Consultation with the USFWS. In addition, the Forest Service will be developing a Biological Evaluation.

Possibly include boilerplate response to requirement of baseline data and meeting CEQ and NEPA regulations.

n/a

[NOTE TO BLM: Provide response detailing whether any changes were made to the FEIS and where. If no changes are made, explain why]

Could respond with simple statement that commenter references have been reviewed and relevant new information has been incorporated. See Section XX of the FEIS for details

n/a



Plan	Issue Statement
OR	The chart needs to use clear terminology for each subobjective.
UT	BLM should exclude areas under consideration for Utah Prairie Dog focus areas by USFWS from GRSG population areas and GRSG management.
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

[BLM consider revising terminology in chart.]

The BLM and Forest Service would continue to cooperate with USFWS in order to determine and manage habitats to support the species.

n/a

n/a

n/a

n/a

n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

sounds like a tech edit. May not need a response. Suggest deleting the issue.

Plan	Issue Statement
------	-----------------

OR n/a

UT Western banded gecko is not likely to occur in the Rich and Uintah GRSG population areas because the Mojave Desert, its habitat, is in the southwest part of Utah.

ID- n/a

SW

MT

NV- n/a

CA

NW n/a

CO

Lewis n/a

town

ND n/a

WY9



Response

NCT Notes

n/a

~~Because~~ The Western Banded gecko is a Mojave Desert species and does not exist in sagebrush ecosystems, it is unlikely to be found in GRSG habitat. Western Banded gecko has been removed from the table containing BLM and Forest Service Sensitive Species in the planning area in the FEIS. [Note to EMPSi: remove reference to Western Banded gecko in FEIS.]

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	Commenter requests clarification of impacts on wildlife from increased WHB riparian use, resulting from removal of water developments under Alternative C.
UT	n/a
ID-SW	n/a
MT	
NV-CA	Single species management will put Sage Grouse and sagebrush habitat above other habitats mainly PJ and associated species.
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

NCT Notes

[BLM, consider revising impacts to fish and wildlife from wild horse and burro management under Alternative C.]

n/a

n/a

This project does provide for or strengthen conservation measures for Sage Grouse, however, it does not nullify consideration for other species and habitats. Management considerations for SSS and sensitive species (FS) will continue to follow current BLM and FS policy. Further, veg treatments will be analyzed through the NEPA process at the site

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	The DLUPA/DEIS fails to accurately describe the assumptions used to complete impact analysis.

ID-SW n/a  
MT  
NV-CA n/a

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

The DLUPA/EIS provides an adequate discussion of the environmental consequences of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1

As stated in Section 4.1.1, the discussion of impacts is based on best available data. Knowledge of the planning area and decision area and professional judgment, based on observation and

n/a

n/a

n/a

n/a

n/a

This sounds like generic NEPA issue/response. Suggest deleting from here, unless there are specific tie in to Big Game impact analysis. If so, revise issue statement & response accordingly and include cross reference to general NEPA impact analysis requirements response (tab 4.6)

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
------	-----------------

OR	n/a
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UT	n/a
----	-----

ID-SW	n/a
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MT	
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NV-CA	n/a
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NWCO	BLM needs to consider additional information about raven predation on sage-grouse.
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Lewisto	n/a
---------	-----

wn	
----	--

ND	n/a
----	-----

WY9	
-----	--

## Response

n/a

n/a

n/a

n/a

The BLM and the Forest Service describe the effects of predation on sage-grouse in the Draft EIS; the information used here and in the affected environment was taken from the Baseline Environmental Report (the BER) and note that *[summarize what the discussion was, specifically noting any reference the commenters make to an particular issue or topic; include page number references from the BER]*. The BLM and the Forest Service have authority to manage the habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. This information can be found in Section XX, page XX of the

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	The BLM should prohibit the construction of
MT	new permanent infrastructure within lands specially designated for sage-grouse protection, because studies show GRSG avoid areas with development.
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

The alternatives consider a range of alternatives regarding ROW avoidance and exclusion. Table 2-3 identifies existing ROW avoidance and exclusion areas in the lands and realty section.

n/a

n/a

n/a

n/a

suggest combining issue  
statement and response with  
that for ID under 14.1 Range  
of Alts

Plan	Issue Statement
OR	<p>Commenters have two opposing views regarding ROW avoidance areas. One group suggested that ROW avoidance areas did not provide enough protections for GRSG. Another group suggested that ROW avoidance areas would be too restrictive for developers. Commenters were concerned that the alternatives were too restrictive on renewable energy development given the low current potential for development of wind resources or advancement of technology which could make the current potential more feasible. The alternatives failed to adequately describe the requirements related to burying existing overhead transmission lines. The FEIS should clarify management direction for new ROWs under Alternative C. The DEIS failed to adequately map timing restrictions for construction, or operation and maintenance of transmission and distribution infrastructure under Alternative D. The DEIS failed to adequately provide the detail on the terms and conditions that would be included for any issuance of a ROW in PGMA. BLM should consider the following within</p>

UT Commenters suggested additions to the range of alternatives considered and provided information on the feasibility of the alternatives (e.g., implementation of the disturbance cap). Commenters described impacts on GRSG from ROW/SUP authorizations including linear and site-type facilities. Commenters also noted that the BLM and USFS must address both existing and future development.

ID-SW Commenters requested clarification of  
MT language in the DEIS, specific to Alternative D, such as types of exclusions and whether lands identified for disposal under current Land Use Plans would be affected. They suggested that agencies might want to recognize the ability of valid existing rights to develop infrastructure necessary for the development of projects; electric utilities request confirm that aboveground fiber optic lines would be allowed under the authorized action. Other commenters would like all land set aside under a special management designation for sage-grouse and be managed as ROW exclusion areas. The BLM should consider developing corridor routes as an alternative. Corridor routes need to be identified and designated for all users. Place emphasis on co-location of new ROW with existing ROWs, prioritize burying lines, use perch diverters. On the other hand, colocation of transmission lines on common structures can affect the reliability rating of each line and could result in a decrease of transfer capability and lead to the need for even more lines; there are

NV-CA Commentors had concerns regarding proposed management actions in the DEIS related to new and existing ROW development, particularly the comparative benefits for GRS habitat from underground versus overhead powerline placement, feasibility of co-locating new powerlines and communication infrastructure in or adjacent to existing ROWs, and potential limitations on the expansion of existing infrastructure. Commentors requested clarification or recommended specific changes to proposed management. Commenters requested clarification on what is energy development. Commenter requested that BLM exempt all utility corridors from GSG restrictions.

NWCO The BLM should modify Alternative D to include statements that the BLM/USFS will strive to retain public ownership of PPH, to acquire non-federal lands important to GRSG, to include the criteria and/or process for determining what constitutes a healthy and stable or increasing GRSG population, and to include the criteria and/or process for determining what constitutes an adverse effect to GRSG due to habitat loss and disruptive activities.

Lewisto Commenters requested BLM consider suggested management actions, including PH under Alternative D be changed from ROW avoidance areas to ROW exclusion areas for oil and gas development, power lines, and wind energy development. In addition, the FEIS should reference the FWS 2012 Land-based Wind Energy Guidelines where such development may ultimately be considered in ROW avoidance or other areas.

ND n/a  
WY9



## Response

As noted above in the response in Section 4.3, Range of Alternatives, Section X.X of the Draft EIS describes how the Oregon GRSG LUPA/EIS planning team employed the planning process to develop a reasonable range of alternatives for the LUPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. Additionally, during the development of the Final EIS, the BLM coordinated with cooperating agencies and considered public comments to determine changes to the management actions and mitigation measures. The EIS affected environment section provides the appropriate information for the scope and scale of the project (see section 4.3 Range of Alternatives of this report for additional details). However, upon BLM and Forest Service reviews, and public comment suggestions, some sections in Chapter 2 and 3 [include appropriate sections/page numbers] have been updated and revised to include clarifications or new information. Some of these clarifications include:

~~Lek buffers will be incorporated in the final EIS.~~

~~Burial or relocation of power lines must be technically and financially feasible.~~

~~Per BLM Handbook H-38-09-1 section 5.3.1.4, "Non-exclusive access, while guaranteed to mining claimants or their designee by the Mining Law, is not unfettered. In special status areas, where the operations would present a risk to the resources that support the special status area designation, the BLM can condition access effects on their resources, the BLM may limit access to constructed roadways or decide in some circumstances that access by means other than a motor vehicle (such as via aircraft or pack animal) is sufficient for the operator to complete their desired activity."~~

~~Geothermal and Oil and Gas are leasable minerals, therefore it is not a ROW.~~

~~Seasonal restrictions as identified are addressing only fluid minerals. The ROW is regulated by required design features.~~

The impacts of the alternatives are adequately discussed in Chapter 4 of the DEIS. None of the comments identified specific deficiencies in the existing analysis or provided additional information for inclusion in the impact analysis. **Chapter 4 Section 4.24, Cumulative Impacts, adequately discusses both existing and future development.**

As stated in Section 1.7, Development of Planning Criteria, the LUPA will recognize valid existing rights. Section XXX of the FEIS discusses how valid existing rights may be impacted by the management actions in this LUP amendment. [EMPSi ACTION ITEM FOR FEIS: Add discussion to Chapter 4 lands and realty section on what happens with valid existing rights when the disturbance cap is already exceeded - i.e., they can be developed with required mitigation measures]+C4

Future ROW/SUP applications would be evaluated and approved on a case-by-case basis based upon site-specific determination of ability to avoid, minimize, and/or mitigate impacts on GRSG habitat at the implementation phase. A proposed project's contribution to the amount of disturbance on the landscape will be evaluated during site-specific NEPA analysis.

[EMPSi ACTION ITEM FOR FEIS Check whether Lands and Realty analysis recognizes that access to valid existing rights could be precluded in certain instances under this amendment. If not discussed, add this discussion (based on discussion in minerals analysis). This is most likely to occur where leases are wholly contained within GRSG habitat in largely undeveloped areas.] [EMPSi ACTION: If new analysis is required in FEIS, update response to indicate sections revised in FEIS.]

[EMPSi ACTION ITEM FOR FEIS Check whether the disturbance impacts of underground transmission lines are discussed in The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/EIS represented a full spectrum of options including a no action alternative (Alternative A). **There is no requirement that any alternative developed meet the objectives of the COT report. Instead, the report, based upon the best scientific and commercial data available at the time, identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.**

Proposed avoidance and exclusion area designations vary by alternative, as explained in the DEIS on page 2-33 in Table 2-3. Under Alternative D, all new ROWs, unless specifically excluded, would be avoided, whenever possible, see LR-3 (ex. wind facilities, etc). Required design features that would apply to specific types of facilities in greater sage-grouse habitat are located in Appendix X, **including reclamation of lands once facility are removed.**

~~The EIS/LUP includes an alternative that allows for placement of fiber optic lines on existing infrastructure (Alternative D-Action LR-6 and LR-7 in Table 2-18).~~ **Alternative E provides for co-location of new infrastructure development if the project is co-located within the footprint for existing infrastructure, to the extent practicable.**

Under Alternative D Table 2-18, LR-9, new power lines outside of existing ROWs, would be buried, where feasible. ~~Reclamation of lands, once facilities are removed are part of standard BMPs, Appendix C.~~ Amendments to existing facilities that are otherwise excluded may be allowed under Alternative D, LR-6. Under Alternative D, lands currently identified for retention within priority greater sage-grouse habitat would be retained unless disposal of those lands would increase the extent or provide for connectivity of priority habitat (LR -19 and LR-21), Alternatives A through F propose retention of all utility corridors (Table 2-18).

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Management actions included in the Draft EIS/LUPA for the underground placement of powerlines are intended to reduce the potential for long-term impacts on GRSG habitat and species viability. Literature (include citations from Habitat objectives table see table 2.6) demonstrates that overhead powerlines provide perching opportunities for ravens and other avian predators. Additional research (citation table 2.6) suggests that GRSG avoid lekking and brood rearing activity in areas within line-of-sight of overhead powerlines. Additionally, while the placement of powerlines underground may result in greater short-term GRSG habitat disturbance, over the long-term and following appropriate reclamation of the surface above underground lines, there would be less surface disturbance. Considerations of costs associated with undergrounding are solely within the purview of the Nevada and California Public Utilities Commissions and are outside the scope of the EIS/LUPA.

Management actions included in the Draft EIS/LUPA for the co-location of new infrastructure within existing ROWs, corridors or communication lease areas are intended to reduce the amount of surface disturbance in GRSG habitat and concentrate new development in habitat areas already affected by anthropogenic activities. The BLM and FS recognize that co-location is not feasible in all circumstances, particularly for new powerlines. Under all alternatives, the BLM and FS would continue to review proposed infrastructure projects on a case-by-case basis within and outside GRSG habitat. Such a review would include preparation of the appropriate NEPA documentation and coordination with the responsible federal, state, and local permitting agencies.

[BLM: What is the definition of 'no longer in service?'] – Rights of ways that are “No longer in service” includes infrastructure no longer needed or being utilized by ROW or leaseholder; this could include old facilities on com sites, telephone poles/lines, or expired ROWs, 2900 permits and R&PP lease cases who no longer have authorizations.

[BLM: How to address CBDs specific recommendations?] – The management actions inside and outside GRSG conservation

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office LUPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office LUPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. Under the preferred alternative (Alternative D), the BLM/FS will retain public ownership of PPH except for disposal of tracts that are not capable of altering greater sage-grouse populations (p 585 and table 2.4 p 148) and greater sage-grouse habitat values will be considered when acquiring lands (table 2.4 p 149). Criteria exists that identifies defines a healthy and stable or increasing greater sage-grouse population as well as for what constitutes an adverse effect to greater sage-grouse populations (Manier 2013) and was referenced in the DEIS (Section 3.4.3 References p 272).

~~As noted above in the Section 4.3 of this Report, Section 2.3 of the Draft EIS describes how the Northwest Colorado GRSG planning team employed the BLM and Forest Service planning processes to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. During the development of the Final EIS, the BLM and Forest Service met with the USFWS to determine changes to the management actions and mitigation measures to meet the purpose and need of the action. The outcome from these Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.~~

Proposed Alternative D for FEIS will make PH wind energy ROW exclusion and GH avoidance. Appendix D will b+C6e modified to include additional RDFs for existing oil and gas leases and add RDFs for ROW related projects once NPT guidance is provided. USFWS wind energy guidelines will apply for development in GH (an avoidance areas) and will be added as an Appendix to the FEIS

n/a

## NCT Notes

## Regional Team NOTES, EDITS, COMMENTS

To eliminate redundancy, suggest streamlining response to include cross reference to section 4.3, then move into specifics related to L/R.

Crossed out text is duplicate information in 4.3 and should be eliminated here. Crossed out text is either unnecessary or it wasn't apparent how it was responding given the issue statement.

Included content to reference  
last comment in issue  
statement.

Strike through replaced by  
inserted red text to address  
topic more broadly. Replaced  
RDF Appendix C with X as  
letter will be different in FEIS.  
Strike through re: BMPs  
replaced with red text  
discussion about RDFs.

Included national response addressing adequacy of range of alts (red). Unnecessary to include citation from table 2.6, merely include reference to that table (strike out). Are you using both definitions of utility-scale? Seems potentially conflicting.

Red text is national response indicating adequacy of range of alternatives considered. Strike thru below of some of same natl response. Moved your addtl range of alt discussion up.



Plan	Issue Statement
OR	n/a
UT	Commenters stated that the BLM and the Forest Service did not provide sufficient affected environment information to meet NEPA requirements. For example, commenters noted that there was no baseline disturbance inventory. In addition, commenters identified reasonably foreseeable lands and realty actions that should be considered as part of the affected environment.

ID-SW Commenters had concerns with specific  
MT Lands and Realty impact analysis assumptions. In particular, commenters questions the validity of the following assumptions: power lines and other vertical structures in areas naturally devoid of perching opportunities provide a perch for raptors and increase the potential for GRSG to abandon leks (Ellis 1984); and mitigation by burying lines or including design features that do not encourage perching on lines would reduce perching opportunities and subsequent impacts on GRSG (Connelly et al. 2000). IPC suggest that a more complete statement is included in the USGS report regarding the effects of energy developments on sage-grouse lek persistence in relation to Walker et al. (2007) study+B3. It appears that selective use is being made of the information provided by Walker et al. (2007), Doherty et al. (2008, Holloran (2005), and Aldridge and Boyce (2007) as they evaluated Coal Bed Natural Gas wells, but did not evaluate effect of powerlines. Lyon and Anderson (2003) evaluated the effect of vehicular traffic associated with

NV-CA 1/2 The DEIS does not reference all relevant studies, policies or regulations related to lands and realty actions. Commenters provided the following references to be considered: [then list] OR Commenters suggested that the BLM and the FS should have considered several additional references in their analysis.

NWCO The BLM needs to double check the miles of transmission line presented in Table 3.14 as the numbers appear to overestimate the amount of lines.

Lewisto The FEIS should explain the rationale for  
wn determining avoidance and exclusion areas and how avoidance will be implemented. The FEIS failed to include information on wind farms on non-BLM lands in the planning area and did not adequately represent the potential for wind farms to be developed given the high wind potential of 42 000

ND The description of transmission line footprints in the DRMPA/DEIS is inaccurate. Division of State Lands are not labeled correctly in the DRMPA/DEIS.

WY9

## Response

n/a

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Utah Greater Sage-Grouse LUPA is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM and the Forest Service complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in Chapter 3 and various appendices including Appendices A, N, O, P, and Q in the Utah Greater Sage-Grouse LUPA is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS.

As specific actions come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions.

The following changes have been made to the FEIS in response to comments:

- Information regarding existing infrastructure and potential for future development (including future renewable energy development) is included in Sections XXX and XXX of the FEIS (lands and realty and renewable energy sections chapter 3 and chapter 4) (NOTE: Consider moving wind RFD information to Chapter 31. TEMPSi ACTION ITEM FOR FEIS: add

Many reports have been prepared for the development of management recommendations, strategies, and regulatory guidelines. The National Technical Team report (NTT 2011), Conservations Objectives Team (COT; FWS 2013), and the Summary of Science, Activities, Programs and Policies that Influence the Rangewide Conservation of Greater Sage-Grouse (also referred to as the Baseline Environmental Report [BER]; Manier et al. 2013) are the most widely used reports that have been incorporated in BLM and Forest Service EISs that address the effects of implementing greater sage-grouse conservation measures on lands they manage. Additionally, the BLM and the Forest Service developed the Idaho Draft Environment Impact Statement/Land Use Plan Amendment with involvement from cooperating agencies, including Idaho Department of Fish and Game to ensure that a balanced multiple-use management strategy to address the protection of greater sage-grouse while allowing for utilization of renewable and nonrenewable resources on the public lands.

Management actions included in the Draft EIS/LUPA for the underground placement of powerlines are intended to reduce the potential for long-term impacts on GRSG habitat and species viability. Literature (~~reference include citations from Habitat objectives table~~) demonstrates that overhead powerlines provide perching opportunities for ravens and other avian predators. Additional research (~~citation reference same table as above~~) suggests that GRSG avoid lekking and brood rearing activity in areas within line of sight of overhead powerlines. Additionally, while the placement of powerlines underground may result in greater short term GRSG habitat disturbance, over the long term and following appropriate reclamation of the surface above underground lines, there would be less surface disturbance.

~~Management actions included in the Draft EIS/LUPA for the co-location of new infrastructure in existing ROWs or communication lease areas are intended to reduce the amount of surface disturbance in GRSG habitat and concentrate new development in habitat areas already affected by anthropogenic activities. The BLM and FS recognize that co-location is not feasible in all circumstances, particularly for new powerlines. Under all alternatives, the BLM and FS would continue to review proposed infrastructure projects on a case by case basis. Such a review would include preparation of the appropriate NEPA documentation and coordination with the responsible federal, state, and local permitting agencies.~~

BLM and the Forest Service are reviewing C5 scientific literature provided by commenters regarding the effects of powerlines on greater sage-grouse, buffers, perch diverters, and overhead versus burying lines, and the agencies will revise the FEIS, as appropriate.

Before beginning the NV/NECA Draft EIS/LUPA and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. A National Technical Team (NTT) was formed as an independent, science-based team to ensure that the best information about how to manage the greater sage-grouse is reviewed, evaluated, and provided to the BLM and the Forest Service in the planning process. The group produced a report in December 2011 that identified science-based management considerations to promote sustainable greater sage-grouse populations. The NTT is staying involved as the BLM and the Forest Service work through the Strategy to make sure that relevant science is considered, reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented.

A baseline environmental report, titled Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse (*Centrocercus urophasianus*) (referred to as the BER), was released on June 3, 2013, by the U.S. Geological Survey. The peer-reviewed report summarizes the current scientific understanding about the various impacts to greater sage-grouse populations and habitats and addresses the location, magnitude, and extent of each threat. The BER does not provide management options. The report is being used by the BLM and the Forest Service in our efforts to develop regulatory mechanisms and improve our conservation efforts of the greater sage-grouse and its habitat to reduce the potential for listing it under the Endangered Species Act. The data for this report were gathered from BLM, Forest Service, and other sources and were the "best available" at the range-wide scale at the time collected.

In March 2013, a team of State and FWS representatives, released the Conservation Objectives Team (COT) report based upon the best scientific and commercial data available at the time that identifies key areas for greater sage-grouse conservation, key threats in those areas, and the extent to which they need to be reduced for the species to be conserved. The report serves as guidance to Federal land management agencies, State greater sage-grouse teams, and others in focusing efforts to achieve effective conservation for this species.

Additionally, Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation



The BLM and the Forest Service complied with CEQ regulations in describing the affected environment and when providing scientific justification for the nature and types of impacts described in Chapter 4, Environmental Consequences. Of the suggested studies and references put forth by the commenters, the BLM and Forest Service reviewed [BLM GRSG team to review studies (e.g. NV Energy 2010 study) which may contradict information in DEIS] them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...[NOTE TO BLM: If the information in the commentors' citations is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where the citations were used. (I would add to this that if the citation was not included or the same, then include a response that indicates new citations will be considered/evaluated and included if they present new information. Something like this from the national template might be appropriate:

"While a land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data, a thorough review of the EIS's baseline data relevant to [speak to the specific topic or theme of the issue statement, e.g., anticipated fluid mineral development of the planning area] is necessary. The BLM and the Forest Service have updated this information in the Proposed Land Use Plan Amendment/FEIS to provide the necessary basis to make informed land use plan-level decisions. Specifically, [insert a summary of the information that was updated and include a citation for where the reader could find it in the FEIS.]" ]

Regarding conversion of BLM/FS lands for agricultural use via the Desert Lands Entry Act, the DEIS precludes disposal of PPH in the land tenure section. For DLE actions, lands have to be identified for disposal.

[Pull in language from 14.1 regarding short- vs. long-term impacts from undergrounding vs. overhead placement].

While the placement of powerlines underground may result in greater short-term GRSG habitat disturbance, over the long-term and following appropriate reclamation of the surface above underground lines, there would be less surface disturbance. (Based on the Summary statement, this response is not applicable. If there's a comment addressing this topic, then include it in the Summary statement, otherwise, delete. Obviously, I didn't take the time to go back to the comments.)

]Regarding conversion of BLM/FS lands for agricultural use via the Desert Lands Entry Act, the DEIS precludes disposal of PPH in the land tenure section. For DLE actions, lands have to be identified for disposal. [Pull in language from 14.1 regarding

As noted previously in Section 7.6 of this Report, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment. Of the suggested studies and references put forth by the commenters, the BLM and FS reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that The data presented in Table 3.14 is taken from the BER, and while it is coarse data, represents one of the sources of best available data.

[NOTE TO BLM: If the information is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where ]  
[NOTE TO BLM: Please respond to the comment regarding rationale.]

Information has been added to Section 3.21, Renewable Energy, to further describe active and planned wind energy developments in and adjacent to the planning area.

[NOTE TO EMPSi: Change to FEIS- update section 3.21 as indicated]

~~A ROW is a permit issued to a project proponent. The ROW is issued with a specific boundary the proponent will administer. A "footprint" is an area used for impacts analysis.~~ A **transmission line** footprint is contained within a ROW boundary and is used to analyze the direct and indirect impacts from disturbance related to the transmission line. In the North Dakota Greater Sage-Grouse DLUPA/DEIS, the analysis of transmission line footprint impacts is based on the Baseline Environmental Report (Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-grouse [*Centrocercus urophasianus*]) (BER). Based on the BER the 650-foot-wide (200 m) footprint is the direct area of influence (buffer) of transmission lines on GRSG. The following sources were used in the BER to determine the area of influence buffer:C32

- Ellis, K.L., 1985, Effects of a new transmission line on distribution and aerial predation of breeding male sage grouse: Final report, 28 p.
- Connelly, J.W., Knick, S.T., Schroeder, M.A., and Stiver, S.J., 2004, Conservation assessment of Greater Sage-Grouse and sagebrush habitats: Report to the Western Association of Fish and Wildlife Agencies (WAFWA), 610 p.
- Bradley, B.A. & Mustard, J.F. (2006) Characterizing the landscape dynamics of an invasive plant and risk of invasion using remote sensing. *Ecological Applications*, 16, 1132–1147.
- Boarman, W. I. and B. Heinrich. 1999. Common Raven (*Corvus corax*). In Poole, A. and F. Gill, editors. eds. *The birds of North America*, No. 476 *The Birds of North America*, Inc. Philadelphia, PA.
- Leu, M., Hanser, S.E., and Knick, S.T., 2008, The human footprint in the west—A large scale analysis of anthropogenic impacts: *Ecological Applications*, v. 18, p. 1119–1139.



Include Habitat objectives table by reference to it in the EIS rather than inclusion of specific references in the response. Strike through text doesn't appear to be needed as it doesn't address the issue statement.

Red text added to issue statement seems appropriate as responses states that commenters provided references. As is, the issue statement doesn't address additional references provided.

Strike out "previously" as  
seems to adopt a dismissive  
tone. Some strike outs merely  
editorial. Include FS in red.

Strike out and red to better  
focus response to issue.

Plan	Issue Statement
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OR	The DEIS failed to accurately analyze the impacts to private lands from ROW avoidance areas.
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UT Commenters stated that impacts on existing valid rights and state lands from lands and realty decisions needed to be clarified. Commenters noted the need to discuss impacts of lands and realty decisions on private lands and mineral development.



ID-SW MT As compared to Alternative A included in the DEIS, the BLM/FS should have concluded that because of Alternative E's adaptive trigger strategy, that impacts from wind energy would be reduced.

The agencies should carefully evaluate the impacts of stipulating co-location of electrical powerlines. Table 3-36 grossly over-estimates the acreage of transmission lines within greater sage-grouse habitat. The Draft EIS provides an unsupported assumption that the footprint for a transmission line is 656-feet wide.

Information on the impact of transmission lines on a landscape level would be more appropriate to reference in relation to sage-grouse persistence in the landscape and that information from Walker et al. 2007 has been used selectively in regards to transmission infrastructure.

NV-CA 1/2 The BLM and FS did not fully analyze the adverse and beneficial direct and indirect effects of proposed lands and realty and renewable energy management actions identified in the DEIS.

NV-CA 2/2

NWCO n/a

Lewisto wn Given the infrastructure and miles of road and powerlines already authorized, how will the continued alteration of habitat maintain or improve conditions for GRSG?

ND The BLM failed to discuss the impacts to school trust lands from the addition of extensive fencing.

WY9

## Response

The DLUPA/EIS provides an adequate discussion of the environmental consequences of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Impacts of lands and realty decisions on renewable energy development are discussed in Section 4.19, Renewable Energy, of the FEIS. Discussion of impacts of lands and realty decisions on private lands has been added to the FEIS in Section 4.18, Lands and Realty.

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

*Impacts from lands and realty to wind energy were discussed in DEIS/LUPA Chapter 4, page 4-331. BLM groups Alternative A and Alternative E together in regards to impacts on wind energy. Under Alternative E, the BLM and the Forest Service would limit impacts from wind and solar energy development through the use of triggers in addition to the general stipulations identified in the GRSG section, as well as required design features best management practices that would also apply to Alternative A. This will be clarified in the FEIS.*

Management actions included in the Draft EIS/LUPA for the co-location of new infrastructure in existing ROWs are intended to reduce the amount of surface disturbance in GRSG habitat and concentrate new development in habitat areas already affected by anthropogenic activities. The BLM and FS recognize that co-location is not feasible in all circumstances, particularly for new powerlines. Under all alternatives, the BLM and FS would continue to review proposed infrastructure

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-I, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. More quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

(From national RTC template, which is sufficient to answer this Summary statement. If the draft responses below remain, then the Summary statement should be revised to reference them and the Responses must be completed. At this point, I'm hesitant to invest the time necessary to complete the responses until its decided whether it necessary to keep them.)

- Indirect effects (socioeconomic, invasive weeds, increased short- and long-term disturbance) and negative consequences from burying powerlines (see language from 14.1). While the placement of powerlines underground may result in greater short-term GRSG habitat disturbance, over the long-term and following appropriate reclamation of the surface above underground lines, there would be less surface disturbance. Application of BMPs and reclamation standards address invasive weeds during construction activities, such as undergrounding powerlines.

Response to address comments related to:- Indirect effects (socioeconomic, invasive weeds, increased short- and long-term disturbance) and negative consequences from burying powerlines (see language from 14.1). While the placement of powerlines underground may result in greater short-term GRSG habitat disturbance, over the long-term and following appropriate reclamation of the surface above underground lines, there would be less surface disturbance. Application of BMPs and reclamation standards address invasive weeds during construction activities, such as undergrounding powerlines.

- Impacts from solar energy development and management of solar energy zones. BLM will manage within solar variance zones and provide a definition. BLM to review Solar PEIS determine conflicts between solar variance areas and GRSG habitat areas. Determine if solar variance areas overlap GRSG habitat. - Citation (Shlisky 2007) added to FEIS to support analysis.- Effects from biofuel activities - the BLM is not creating incentives for the creation or facilitation of a biomass industry. Incentivization of biofuels is outside the scope of the EIS. - Blanket application of anti-perch devices on transmission towers - application of anti-perch devices for existing structures would be evaluated at the time of ROW renewal and on a case-by-case basis. - BLM: Evaluate level of impacts between transmission lines and distribution lines and incorporate different management actions as appropriate. Distribution Line (e.g., 12.5 kV; 34.5 kV): Lines used for transmitting energy to its end use, including commercial facilities, small factories or a small transformer outside a group of houses. Transmission Lines (e.g., 230 kV; 345 kV; 500 kV): Used for transmitting electrical energy over great distances. BLM added the definition of distribution lines to the documents glossary. Impacts from these two different lines vary and would be

n/a

The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse. The requisite level of information necessary to provide an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives is to provide the public and the decision maker with the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented (40 CFR 1502.16).

The cumulative impacts associated with past, present, and reasonably foreseeable actions, including roads and powerlines, on GRS and GRS habitat are described in Section 5.2, Greater Sage-Grouse. Some restrictions are currently in place for travel; for example, cross-country OHV travel is prohibited and must remain on existing travel routes except for administrative purposes (see sections 1.8.7, Off-Highway Vehicle Record of Decision and Proposed Plan Amendment for Montana, North Dakota, and Portions of South Dakota, and 3.11.1 Comprehensive Travel And Transportation Management-Current Conditions). Management actions proposed in this RMP amendment strive to reduce the threats to GRS and GRS habitat on BLM-administered lands in the planning area; however, as described in Section 5.2, overall trends toward habitat loss and fragmentation are likely to continue in isolated populations, particularly in the Dakotas and Powder River Basin, while the northern Montana, northern Great Basin, and Snake-Salmon-Beaverhead Rivers subpopulations, which are

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. None of the alternatives in the DRMPA/DEIS propose to eliminate livestock grazing from BLM-administered lands; therefore, an analysis of impacts from extensive fencing from eliminating livestock grazing is not necessary in the DEIS. The reference to "extensive fencing to segregate it from private lands to prevent unauthorized grazing" on page 2-18 of the DRMPA/DEIS is part of the discussion of why an alternative that eliminated livestock grazing from BLM-administered lands was not included in the range of alternatives in the North Dakota Greater Sage-Grouse DRMPA/DEIS.

*The BLM understands the potential impact to school trust lands from extensive CIO fencing and has made reference to it in Section*

Either include comment/issue about renewable energy in issue statement or delete response.



Red paragraph from national responses as is appropriate. Strike out/red as BMPs are being called required design features and they will apply to the LUPA, not necessarily Alt A. Based on NPT direction, new utility scale and/or commercial development/ROWs will be excluded in priority (medial) and at a minimum avoided in general habitat. Potentially, italicized paragraph needs revision based on NPT direction.

Added red paragraph from national responses as is appropriate. Agree with comment that issue statement should be revised to reflect responses addressed or delete the responses. Not necessarily a big deal to edit the issue statement by including a brief list of the specific issues (already included in the response) and then the revise the existing responses.

Red content from national response.

Appears that the issue statement doesn't sufficiently capture commenter(s) concern(s) regarding elimination of grazing OR response should be revised to focus on existing issue statement. Consider red content provided from national responses as sufficient. Clarify direction to BLM and EMPSi and intent of response. "Made reference" doesn't satisfy issue statement.

Plan	Issue Statement
OR	n/a
UT	Commenters expressed concern that the BLM and Forest Service did not consider the cumulative impacts of lands and realty decisions in the Utah planning area across the GRSG range. Commenters also noted that the BLM and Forest Service did not adequately consider reasonably foreseeable conditions regarding renewable energy on all lands.
ID-SW	n/a
MT	
NV-CA	The DEIS does not consider the cumulative impacts from the Mt. Hope EIS or wind energy projects at China Mountain and the Diamond Range. The EIS does not provide additional information on projects that are reasonable foreseeable future actions.
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

As the decisions under consideration by the BLM and the Forest Service are programmatic in nature and would not result in on-the-ground planning decision or actions (e.g., the BLM is not approving an Application for Permit to Drill to start drilling), the scope of the analysis was conducted at a regional, programmatic level. The analysis focuses on the direct, indirect, and cumulative impacts that could potentially result from on-the-ground changes. This analysis identifies impacts that may result in some level of change to the resources, regardless of whether that change is beneficial or adverse. The CEQ established implementing regulations for NEPA, requiring that a Federal agency identify relevant information that may be incomplete or unavailable for evaluating reasonably foreseeable significant adverse impacts in an EIS (40 CFR, Part 1502.22). If the information is essential to a reasoned choice among alternatives, it must be included or addressed in an EIS. Knowledge and information is, and will always be, incomplete, particularly with infinitely complex ecosystems considered at various scales. The DEIS included a reasonably foreseeable development scenario for wind projects in GRSG habitat (see Section 4.19). A list of specific reasonably foreseeable future actions proposed in GRSG habitat is also included in Table 4.55 in Section 4.24.2.

+C4

n/a

The BLM and the Forest Service thoroughly explained its consideration and analysis of cumulative effects in the DLUPA/EIS in Section XX.XX. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. As such, the BLM and the Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning level. The DLUPA/EIS considered past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions.

BLM identified existing wind energy ROW applications, including the China Mountain project, in Table 5.1 of the DEIS. A decision on the China Mountain wind project has been temporarily deferred. All proposed development plans will be reviewed for consistency with the amended land use plan.

Mt. Hope record of decision was issued in 2012. If they have started construction, then table needs to be updated. Where is the project being considered (Chapter 3 or future development in Ch. 5?). [Wendy to provide califcaton language]. BLM has not received an application for a potential wind project on the Diamond Range. The Mt. Hope EIS relates to a mineral development project and is addressed in the minerals section [confirm with minerals team]. C6

BLM has not received an application for a potential wind project on the Diamond Range. The Mt. Hope EIS relates to a

n/a

n/a

n/a

Red content from national responses.

Red content from national responses.

Plan	Issue Statement
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OR	The DEIS failed to provide a comprehensive list of required mitigation measures for ROW development.
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UT Commenters requested revisions to road and transmission line RDFs in Appendix J.

ID-SW n/a  
MT



NV-CA Mitigation requirements for new electrical transmission infrastructure identified in Appendix A - Required Design Features, of the DEIS do not properly consider site-specific applications or benefits to Sage-Grouse, do not incorporate relevant information from the Avian Powerline Interaction Committee, do not differentiate types of mitigation between transmission and distribution lines, and may not be feasibly implemented due to costs.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Taking certain actions [or not taking action, depending on position of issue statement], such as [cite to any specific examples included with comments], is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.

Mitigation has been further defined in the FEIS as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with the BLM's Regional Mitigation Manual MS-1794, Forest Service Handbook FSH 1909.15, and CEQ regulations at 40 CFR 1508.20.

Mitigation, adaptive management and a

The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Not taking action, such as differentiating types of mitigation between transmission and distribution lines, is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.

Additionally, Site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions. Mitigation has been further defined in the FEIS as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats. The Monitoring Framework in Appendix X outlines the methods that the BLM and USFS will use to monitor habitats and evaluate the implementation and effectiveness of the planning strategy to conserve the species and its habitat. The regulations for the BLM (43 CFR 1610.4-9) and the USFS (36 CFR 219.12) require that land use plans establish intervals and standards, as appropriate, for monitoring and evaluations, based on the sensitivity of the resource to the decisions involved. BLM and USFS will use the methods described in Appendix X to collect monitoring data to evaluate implementation and effectiveness of the Greater Sage-grouse planning strategy and the conservation measures contained in land use plans.

RDFs included in the DEIS are based on best management practices included in the NTT report and are based on the best available science at the time of publication. RDFs in Appendix J were clarified in the FEIS, where appropriate.

n/a

The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. Not taking action, such as differentiating types of mitigation between transmission and distribution lines, is only one of many potential forms of mitigation. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.

Additionally, site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions. Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with the BLM's Regional Mitigation Manual MS-1794, Forest Service Handbook

n/a

n/a

n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

Red content is from new and existing national response.

Red content from new and existing national responses on mitigation and monitoring.

Red content is from new national response. Funding response drafted from email response from SOL (Sara).

Plan	Issue Statement
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OR n/a

UT Commenters stated that the DLUPA/EIS incorrectly assumes that horizontal drilling can be used in all cases to reach areas subject to an NSO stipulation. Technology and geology limit the use of this technology to reach resources. Due to this incorrect assumption, the impacts stated in the socioeconomic section should also be revised.

ID-SW n/a

MT

NV-CA The BLM and Forest Service relied on incorrect assumptions, especially in regards to fluid minerals leasing, when conducting the analysis for riparian areas. LUP requirements for avoiding disturbance within 400 feet of riparian areas or water ways should provide adequate protection of

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9



## Response

n/a

Section XXX of the FEIS [in Chapter 4 fluid minerals alt A] recognizes that there are technical limitations on both horizontal and directional drilling [EMPSi ACTION ITEM FOR FEIS Add "horizontal" to this section] and that the use of these technologies may not provide access to all formations containing fluid mineral resources.

Language has been added to the reasonably foreseeable development scenario describing the current limitations and potential future conditions of directional and horizontal drilling technology. The reasonably foreseeable development scenario predicts development over a period of 15-20 years and, at times, assumes that technological advances (such as improved drilling methods) will continue to occur. Therefore, estimated future well development in the reasonably foreseeable development scenario is not necessarily tied to current limitations of directional and horizontal drilling.

Clarification has been added to the document noting that horizontal drilling may not be technologically feasible in all cases in Sections XXXX.

[NOTE TO BLM: May need to follow up with ICF on socioeconomic impacts.]

n/a

Nevada BLM has developed standardized stipulations for fluid minerals. For riparian areas NSO and a CSU stipulation for a 500-foot buffer around the riparian area.

n/a

n/a

n/a

sounds more appropriate to  
address in the impacts analysis  
section, 15.3

move to section 15.3, speaks  
to impact analysis

Plan	Issue Statement
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- |    |   |
|----|---|
| OR | <p>Consider new management actions for minerals and energy development. [Note to BLM: The actions proposed that are not currently considered are:</p> <ul style="list-style-type: none"><li>• Pursue buy outs or exchanges of leases in order to direct leasing and development toward areas with low or no habitat conflicts</li><li>• Only allowing fluid mineral leasing in connectivity habitat subject to no surface occupancy stipulations.</li></ul> <p>For SGCAs [10km ~ 6mi]:</p> <ul style="list-style-type: none"><li>• In existing leased and permitted areas, apply a 10 km non-surface occupancy around active leks and limit permitted disturbance to 1 per section and no more than 3% surface disturbance per section.</li><li>• Implement courtship, nesting, early-brood rearing and winter seasonal and timing restrictions for all human activities.</li><li>• Avoid the surface disposal of produced water<sup>257</sup> unless it can be proven to be beneficial to sage-grouse and includes measures to preclude the spread of West Nile virus.</li></ul> <p>For GRSg habitat outside of SGCAs:</p> <ul style="list-style-type: none"><li>• Apply a 10 km non-surface occupancy</li></ul> |
|----|---|

- UT
1. The DLUPA/EIS violates valid existing rights by applying additional restrictions to existing mineral leases.
  2. The DLUPA/EIS should not apply blanket restrictions in this programmatic document. Site-specific restrictions tailored to individual circumstances are more appropriate.
  3. The restrictions on leasable mineral development proposed in the DLUPA/EIS are too vague to be consistently enforced.
  4. The restrictions on leasable mineral development proposed in the DLUPA/EIS are too burdensome and will have unintended negative consequences. Other measures would work just as well and provide more flexibility for developers.
  5. The restrictions on leasable mineral development proposed in the DLUA/EIS are not stringent enough to adequately protect GRSG.

ID- The DEIS needs a better explanation on how  
SW valid existing rights are defined and how they  
MT will be protected, including fringe or  
preference right leases. The alternatives need  
to follow the NTT report recommendations  
more closely, as well as reflect current  
USFWS policy recommendations.  
The BLM needs to clarify the location of non-  
leased Known Phosphate Areas in relation to  
GRSG habitat. The plan is potentially more  
restrictive to phosphate leasing than a listing  
under the ESA and did not properly define  
the environmental baseline for leasable  
minerals. Without prohibiting new phosphate  
mining in GRSG habitat, the LUPA does not  
protect GRSG from the potential impacts of  
selenium being released to the environment  
and poisoning wildlife, including GRSG,  
through transport in air and water and  
subsequent bioaccumulation. The EIS fails to  
explain or discuss the authority that the BLM  
has to close public lands to leasable mineral  
prospecting and leasing under the LUPA  
process under Alternatives B, C and D.

NV- The BLM and Forest Service should provide  
CA additional detail and/or revisions regarding  
leasable minerals alternatives, including  
provisions for an appeal process associated  
with SSUS-3, requiring reclamation instead of  
restoration, and specifying an NSO buffer  
distance. All priority habitats should be found  
unsuitable for coal leasing to provide  
regulatory certainty.  
The DEIS did not accurately reflect the state  
alternative in terms of withdrawals.  
Commenters asserted Alternative B  
management (specifically application of the 3%  
disturbance cap) is inappropriate for existing  
leases.  
Commenters noted that restoration is too  
rigorous of a standard to meet and the term  
should be replaced with reclamation with the  
type of plant community specified at the time

NW The BLM needs to consider additional actions  
CO or clarifications to existing actions within the  
range of alternatives. Some of the  
management actions are not compliant with  
current management policies and guidance.  
[NOTE TO BLM: the actions noted in the  
comments came from the USFWS letter.]

Lewis town The BLM needs to consider additional actions or clarifications to existing actions within the range of alternatives, including RDFs, BMPs, disturbance cap, and well pad density. Also, commenters requested clarification on the life span of the existing protest resolution decision that does not allow oil and gas leasing of nominated parcels that would require a special stipulation that would protect important wildlife values.

ND n/a

WY9

Closure in PGMA and PPMA is already considered in the alternatives.

CSU consideration is considered in alternative D, discussing NSO buffers, water closures, etc.

NOTE TO BLM: Review the following citation for 10 km NSO

Naugle, D.F., K.E. Doherty, B.L. Walker, M.J. Holloran, and H.E. Copeland. 2011. Energy development and Greater Sage-Grouse. Pp. 489-503 in S.T. Knick and J.W. Connelly (editors). Greater Sage-Grouse: ecology and conservation of a landscape species and its habitats. Studies in Avian Biology (vol. 38). University of California Press. Berkeley, CA.

\*\*New alternative proposed : phased leasing alternative-less than 1/3 of planning area.



As noted ~~above~~ **previously** in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives.

1. As stated in Section 1.7, Development of Planning Criteria, the LUPA will recognize all valid existing rights. The potential impacts on valid existing rights from management decisions in this plan amendment are further discussed in Section 4.20, Minerals, and Appendix R, Oil and Gas Reasonably Foreseeable Development Scenario for Greater Sage-Grouse Occupied Habitat in Utah Sub-Region.
2. The range of alternatives analyzed in Section 2.6, Detailed Comparison of Alternatives, of the DEIS included alternatives that focus on both site-specific and broad restrictions, and the impacts of these varying types of restrictions are analyzed in Section 4.20.2, Nonenergy Leasable Minerals. In appropriate cases where broad restrictions are applied, exceptions ensure that these restrictions are only applied where appropriate.
3. Where appropriate, the BLM has added clarity to explain how restrictions will be applied and has clarified definitions of terms in the FEIS Glossary (Volume II). Definitions of restrictions and explanations of how they will be applied are included in Section 4.20.2 and Table 2.1. [EMPSi ACTION ITEM FOR FEIS: add definitions of restrictions and explanations of how they are applied to minerals development.]

[NOTE TO BLM: The BLM should examine the existing discussion of valid existing rights that will survive the proposed LUPA and should expand that discussion if it seems insufficient.]

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/DEIS that best addressed the issues and concerns identified by the affected public. The DLUPA/DEIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights. BLM agrees that it cannot impose an NSO on an existing lease. A definition of valid and existing rights has been added to the Glossary in the FEIS.

[NOTE TO BLM: Multiple changes were recommended to the FEIS by Porter- see separate tracking sheet.]

[NOTE TO BLM: Have minerals program elaborate on where the phosphate leases are relative to the management designations for the various Alternatives. Makela- is there an adequate baseline description for leaseable minerals? Also, BLM look into the issue of restrictions in proposed plan relative to restrictions under an ESA listing for minerals development.]

[NOTE TO BLM: determine whether there are mineral leases in the ACECs proposed by

The establishment of an appeal process is outside the scope of work for this document. DEIS is consistent with current BLM/FS best management practices for restoration (see existing list of best management practices). ~~The Executive Summary does not provide the level of specificity as the remainder of the document.~~

It seems that only one portion of the summary is addressed (the appeal process).

Additional information should be included to address the other aspects of the issue. Additionally, the issue summary does not reference the executive summary, so the last statement in the first paragraph is confusing.

DEIS Action D FFME 15 will be revised to read: "Insure bonds are sufficient for costs relative to reclamation."

As noted above in the Section 4.3 of this Report, Section 2.3 of the Draft EIS describes how the Northwest Colorado GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the four alternatives are described in Table 2-2, Comparative Summary of Alternatives, in Section 2.8, Summary Comparison of Alternatives, of the Draft EIS.

Additionally, Sections 4.3 and 7.5 of this report discuss how the BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and FS regulations, policy and guidance. During the development of the Final EIS, the BLM and FS met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and

Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

As discussed in section 1.3, Proposed Action, there is an existing protest resolution decision affecting lands managed within the LFO that does not allow oil and gas leasing of nominated parcels that would require a special stipulation to protect important wildlife values, which includes PPH and PGH, or PH and GH. New leasing of areas with important wildlife values cannot occur until the BLM completes a plan amendment/EIS or a new/revised RMP/EIS, including oil and gas leasing decisions identified in a ROD. Because this RMPA only considers management actions for GRSG and does not address oil and gas leasing options for other wildlife resource values, oil and gas leasing will not be addressed in this RMPA/EIS. (The LFO RMP revision process will begin in 2013, which will address oil and gas leasing for the entire LFO planning area boundary.)

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no  
n/a



Plan	Issue Statement
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OR	Consider additional studies and information. The BLM should disclose the split mineral estate for the State of Oregon and the legal constraints that might impose on some activities. There are discrepancies between Chapter 3 and Appendix O in the acres of leased lands in the planning area.
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UT	<ol style="list-style-type: none"><li>1. The DLUPA/EIS needs to clarify that the RFD does not place any limits on future development.</li><li>2. A new mineral report needs to be written for the Utah planning area because the one used for this plan did not follow the requirements in BLM Manual 3060 and is inaccurate in its assessment of occurrence and potential.</li><li>3. The DLUPA/EIS needed to discuss the existing KPLA within GRSG habitat.</li><li>4. The data on coal occurrence and development potential in the planning area is inadequate.</li></ol>
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ID- The oil and gas conditions in the Payette area  
SW are different than those studied in the NTT  
MT report and should not be used as baseline  
data. The impacts described by Johnson et al  
2011 are overstated and should be replaced  
by information from Coates et al 2013.

NV- Commenters suggested additional literature  
CA for the BLM and Forest Service to consider  
including in the EIS. Topics of concern  
included noise; geothermal resources; and  
hydraulic fracturing.  
The BLM and Forest Service need to forecast  
the number of wells expected to be drilled in  
PPMA and PGMA under each alternative.

NW The BLM needs to consider additional  
CO research sources regarding the effects of oil  
and gas development on sage grouse  
populations.  
Taylor, R. L., J. D. Tack, D. E. Naugle, L. S.  
Mills. 2013. Combined effects of energy  
development and disease on greater sage-  
grouse. PLoS ONE 8(8): e71256.  
doi:10.1371/journal.pone.0071256. Available

~\*  
Lewis n/a  
town

ND The BLM needs to justify the assumption that all new wells will be drilled from a single pad. BLM needs to consider an array of studies that address the impacts of well density on sage-grouse (see specific references in above comment).

WY9



The BLM reviewed the additional studies and information and incorporated it into the document as appropriate. [Note to BLM: review studies and determine if/where changes in the document are needed.]

As stated on page ES-4 of the Draft RMPA/EIS, "...the management directions and actions outlined in this RMPA/EIS will apply only to BLM-administered surface lands in the planning area (Table ES-2) and BLM-administered federal mineral estate that may lie beneath other surface ownership, often referred to as split-estate lands. These two areas are collectively referred to as the decision area."

The BLM has corrected the inconsistency in leased acres.

*The BLM is working to find state surface with federal minerals.*

1. This clarification has been added to Section XXXX of the FEIS [NOTE: add language to Minerals Ch 3 and 4 sections]. [EMPSi ACTION ITEM FOR FEIS: add this information.]

2. The RFD included in the DEIS is not a mineral potential report and therefore is not subject to the requirements of Manual 3060. By law, a mineral potential report is not required for land-use planning efforts (see Manual 3031, Energy and Mineral Resource Assessment). The BLM has collated sufficient information to support the analysis in this broad-scale planning document. For the Utah Sub-regional GRSG DEIS, including this RFD, the BLM used a modified version of the oil and gas potential map contained in the USGS publication Summary of Science, Activities, Programs, and Policies That Influence the Rangeland Conservation of Greater Sage-Grouse (*Centrocercus urophasianus*), also known as the Baseline Environmental Report (BER). This map was originally included in a peer reviewed document titled Mapping Oil and Gas Development Potential in the US Intermountain West and Estimating the Impacts to Species (Copeland et al). During development of the DEIS the baseline map was reviewed by qualified BLM mineral specialists, including geologists and petroleum engineers, in the BLM Utah State Office. Numerous changes were made to the map to more accurately reflect oil and gas potential in the planning area. For example, approximately 3,339,234 acres of additional moderate potential, and 265,278 acres of additional high potential were identified. A modified version of the map developed by Copeland et al was used for this EIS because it estimates oil and gas potential for all GRSG habitat in planning area and there are few if any products similar to this available. Oil and gas potential maps were included in the mineral reports completed for the Cedar City, Price, Vernal, Richfield, and Kanab RMPs; these maps were not used because the combination of these maps does not provide information on oil and gas potential covering all GRSG habitat located in the Utah planning area. In addition, these mineral potential reports, which were completed for individual planning units were not edge-matched, meaning when the layers were placed

The reasonably foreseeable development scenario for oil and gas assumes a conventional oil and gas field. The current development occurring in the Payette area of Idaho is not within sage grouse habitat. BLM's preferred management action has been changed in the FEIS to applying a year-round No Surface Occupancy stipulation in PPMA and PMMA. Seasonal restrictions would be applied in PGMA. Lands outside of sage grouse habitat would not be subject to stipulations developed in this EIS.

[NOTE TO BLM: Review section on 4-8 for best available science for basis of decisions. Have a biologist help determine.]

~~The DEIS is based on the best available science available at the time of publication. The BLM will review additional literature (e.g. hydraulic fracturing) to determine applicability for the FEIS as it becomes available.~~

As noted in section 4.4, affected environment, the CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration."

The affected environment provided in Chapter 3 and various appendices including Appendices A, N, O, P, and Q in the Utah Greater Sage-Grouse LUPA is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS.

Hydraulic fracturing would not increase the number of exploration wells. It is used to enhance production. Therefore, this new technology would not modify the RFD scenario in the DEIS.

Noise related impacts on GRSG habitat is analyzed in the DEIS and will be further refined in the FEIS. Impacts on mineral development from noise mitigation measures (e.g. buffers/set-backs) will be further addressed in the FEIS based on the management actions in the proposed plan.

[NOTE to BLM: Review the cited source and determine if the information is already included in the DEIS or should be added to the FEIS. If not included, write rationale for why source was not cited/used. If the sources are essentially the same information as presented in the EIS, then use this response below:]

As noted previously in Section 7.6, Best Available Information, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment. Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined n/a

NOTE TO BLM: The “BLM needs to justify the assumption that all new wells will be drilled from a single pad” portion of the issue summary should get a response to.

NOTE TO BLM: These referenced materials need to be reviewed for relevance and whether the information is new. Determine whether the information is already covered in the EIS (although specific reference is to another document), or if the new references change the conclusions of the analysis.

All future leasing would either be an NSO or NL in the action alternatives; therefore, well density limits are not applicable to future lease development in the North Dakota Greater Sage-Grouse LUPA/EIS. Additionally, BLM cannot change the current well densities in the planning area.

BLM teams have reviewed the suggested studies to determine if they are substantially different than the information cited in the DEIS. The commenters’ additional information was found to provide the [NOTE TO BLM: same/similar information/results/findings] as already noted in the DEIS, therefore inclusion and consideration would not substantially alter the conclusions or analysis. Therefore, they were not incorporated into the FEIS. [NOTE TO BLM: Could expand on the response with specifics of how the information was similar and where it could be found in the EIS.]

NOTE TO BLM: If the report presented different/newer information that reviewer believes should be included in the FEIS, then the response would be: BLM teams have reviewed the suggested studies to determine if they are substantially different than the information cited in the DEIS. The commenters’ additional information was found to provide new/updated information that has been incorporated into the FEIS (see Section



Plan	Issue Statement
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OR n/a

UT 1. The impact analysis should include oil shale because existing oil shale leases will be impacted by these management actions.  
2. The analysis in the DLUPA/EIS should consider the fact that fluid mineral extraction operations can only be relocated where resources exist and are accessible.  
3. The impacts of the management actions proposed in the DLUPA/EIS on leasable minerals will be more severe than those discussed in the document based on the totality of the restrictions that would be applied.

ID- The impact analysis in the DEIS of  
SW management actions on leasable mineral  
MT development is insufficient.

NV- The BLM and Forest Service should provide a  
CA quantitative context for impacts.  
Commenters also had concerns about the impacts on fluid mineral development from NSO stipulations without modifications, waivers, and exceptions.

NW The BLM has failed to adequately disclose the  
CO impacts of the noted restrictions on oil and  
gas operations.

BLM needs to provide further analysis to show the effectiveness of using a less restrictive action/mitigation rather than a more restrictive one. The oil and gas analysis was overly biased in presenting adverse effects from oil and gas developed and not presenting the adverse effects created by other programs/uses.

Lewis The DRMPA/DEIS fails to clarify how best  
town management practices will be applied to valid  
existing rights.

ND The DRMPA/DEIS fails to clarify how best management practices will be applied to valid existing rights for fluid minerals.

WY9



Response

NCT Notes

n/a

1. Analysis of impacts of the management actions proposed under this LUPA/EIS on oil shale has been added to Section XXX of the FEIS (Ch 3 and 4 leasable mineral sections). [EMPSi ACTION ITEM FOR FEIS: add this information.] [EMPSi ACTION ITEM FOR FEIS: Information regarding Enefit's RD&D area as well as the preferential lease right (PRL) area needs to be added to the body of the EIS (Ch 4 and Ch 3)]. No oil shale or tar sands development is allowed in GRSg habitat per the 2012 PEIS except for in the Asphalt Ridge area and the RD&D and PRL area. BLM needs to disclose the impacts of these operations on GRSg and the impacts of GRSg management on these two operations. Potential impacts on these operations could occur from BLM's lands and realty management decisions (ROW exclusion/avoidance precluding access) and mitigation requirements (BLM to elaborate on these further). Enefit's RD&D operation constitutes a valid existing right. [EMPSi ACTION ITEM: (Does the PRL area constitute a valid existing right or can BLM deny the lease? KP need to research this.)]

Response 2: clarify where analysis has been supplemented (other resource sections, appendix, etc.)

2. This analysis is already included in Section 4.20.2 of the DEIS and has been supplemented as necessary.

3. Impact analysis has been revised as appropriate to discuss additional impacts of seasonal limitations, closures, and RDFs [EMPSi ACTION ITEM FOR FEIS:: Add information on nature and type of impacts including closures and blocks of land - could hinder exploration on isolated leased parcels-, seasonal restrictions and safety concerns, etc.]. [NOTE: Check coal and fluids impacts analysis for impacts of overlapping impacts of seasonal habitats on minerals development. Seasonal restrictions overlapping could The acres of unleased KPLA land unavailable for development by alternative will be corrected in the Ch. 4 tables in the FEIS. The section describing the impacts from leasable minerals management for Alt E will be revised. The impacts of non-energy leasable minerals management actions to socio-economics will be included in the FEIS and the impacts with respect to disturbance caps will be analyzed in more detail.

[NOTE TO BLM: Tables of acres of unleased KPLA land unavailable for development by alternative in Ch. 4 need to be corrected.]

[NOTE TO BLM: Impacts from leasable minerals management in alt E needs to be revised.]

[NOTE TO BLM: Include a discussion of the effects of phosphate management actions to socio-economics in Ch 4. Also, references to section 4.11.2 should be corrected and should refer to section 4.12.2.]

[NOTE TO BLM: Distinguish between Impacts from Alts F and B. Note: This is a Quantitative context for current and future disturbance associated with fluid minerals can be found in Appendix H: Oil and Gas RFDs.

The rationale for the NSO stipulation without waivers, exceptions, or modifications is part of Alternative D; however, the range of other alternatives would allow for exceptions, modifications, or waivers.

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

The impacts from leasable mineral development on sage grouse and its habitat are discussed in Section 4.4.2; impacts from the management actions and conservation

Valid existing rights are discussed in sections 1.6.3, Issues Identified, and 1.7 Development of Planning Criteria, and several locations throughout Chapter 4. As stated in Section 1.7, Development of Planning Criteria (p. 1-14), the RMPA will recognize valid existing rights. In the Management Common to All Alternatives (Section 2.4.4, p. 2-8), the BLM further clarifies this by stating that valid existing rights will be honored, which include any leases, claims, or other authorizations established before a new or modified authorization, change in land designation, or new or modified regulation is approved.

When an oil and gas lease is issued, it constitutes a valid existing right; the BLM cannot unilaterally change the terms and conditions of the lease. Existing leases would not be affected by new closures and/or areas administratively unavailable for lease, and restrictions could not be added to existing leases. Surface use and timing restrictions resulting from this RMPA cannot be applied to existing leases. Existing leases would not be terminated until the lease expires. However, based on site- or project-specific environmental analysis, conditions of approval (COA) could be applied at the APD and Sundry Notice stage and at subsequent development stages to mitigate potential impacts from oil and gas operations within existing lease areas, providing the leaseholder's right to develop the lease remains intact (Section 2.4.4, p. 2-8).

Appendix C and Appendix D of the Lewistown Field Office Greater Sage-Grouse DRMPA/DEIS contains required design features (RDFs) and best management practices (BMPs) that could be applied as COA at the APD and Sundry Notice stages for existing leases. The RDFs and BMPs are designed to protect GRSG habitat. The use and application of specific RDFs and BMPs would be made during the environmental analysis process for individual proposals on a case-by-case basis. Additional language in Appendix D regarding these rights will be included with the updated appendix.

As stated in Section 1.7, Development of Planning Criteria (p. 1-113), the RMPA will recognize valid existing rights. In the Management Common to All Alternatives (Section 2.4.4, p. 2-6), the BLM further clarifies this by stating that valid existing rights will be honored, which include any leases, claims, or other authorizations established before a new or modified authorization, change in land designation, or new or modified regulation is approved. Under Alternative D, during implementation level review and decisions, (e.g., approval of an APD, Sundry Notice, etc.) and upon completion of the environmental record of review (43 CFR 3162.5), evaluate whether the conservation measure is “reasonable” (43 CFR 3101.1-2) with the valid existing rights (see pages 2-33 and 2-34 in the DEIS).

When an oil and gas lease is issued, it constitutes a valid existing right; the BLM cannot unilaterally change the terms and conditions of the lease. Existing leases would not be affected by new closures and/or areas administratively unavailable for lease, and restrictions could not be added to existing leases. Surface use and timing stipulations resulting from this RMPA cannot be applied to existing leases. Existing leases would not be terminated until the lease expires. However, based on site- or project-specific environmental analysis, conditions of approval (COA) could be applied at the APD and Sundry Notice stage and at subsequent development stages to mitigate potential impacts from oil and gas operations within existing lease areas, providing the leaseholder’s right to develop the lease remains intact (Section 2.4.4, p. 2-6).

Appendix B, Greater Sage-Grouse Habitat Required Design Features and Best Management Practices, contains required design features (RDFs) and best management practices (BMPs) that could be applied as COA at the APD and Sundry Notice stages for existing leases. The RDFs and BMPs are designed to protect GRSG habitat. The use and



Plan	Issue Statement
OR	n/a
UT	The DLUPA/DEIS fails to adequately analyze the cumulative impacts of the other Greater Sage-Grouse LUPAs/EISs on the Western Phosphate Field.
ID-SW	The DEIS did not adequately analyze
MT	cumulative impacts of management actions on leasable mineral development, including impacts to the Western Phosphate Field, the American agriculture industry, and national food security.

NV-CA The cumulative impacts analysis is incomplete and inconsistent with other

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

Additional information on the cumulative impacts on the Western Phosphate Field has been added to Section 4.24.21, Minerals, of the FEIS. [EMPSi ACTION ITEM FOR FEIS: Add information on this based on info provided by BLM]

The BLM and the Forest Service thoroughly explained its consideration and analysis of cumulative effects in the DLUPA/EIS in Section 4.24.20. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective.

Additional information on the cumulative impacts on the Western Phosphate Field, unleased KPLAs, socio-economic impacts from loss of phosphate resources, reasonably foreseeable actions, and proposed conservation measures have been added to Section XXX (minerals cumulative impacts). [NOTE TO BLM: Review cumulative section and add necessary information.]

The FEIS will address cumulative impacts analyses that are incomplete and inconsistent with other sections of the DEIS.

n/a

n/a

n/a





Plan Issue Statement

- OR n/a
- UT
  1. Requiring off-site mitigation regardless of site-specific circumstances is contrary to current BLM mitigation policy
  2. The BLM needs to modify its language on exceptions, waivers, and modifications to stipulations

ID- The reliance upon vague RDFs under  
SW Alternative D is a failure of the BLM to adopt  
MT best science that calls for specific restrictions based on observed GRSG response to surface disturbances.

NV- Off-site mitigation is not a viable conservation  
CA strategy, as evidenced by research in Wyoming.

NW Additional reclamation bonding requirements  
CO are unnecessary as both federal and state  
government require bonding, and the  
additional requirements go against current  
regulations (43 CFR 3104 and 36 CRF 228  
Subpart E).

Lewis Commenters requested that mitigation for  
town prospecting permits for non-energy leasable  
mineral development be described or defined.

ND The DRMPA/DEIS fails to adequately analyze  
the effectiveness of mitigation associated with  
existing, undeveloped oil and gas leases in PH  
and GH.

BLM failed consider non-heliportable type  
drilling best management practices for seismic  
operations.

Response	NCT Notes
n/a	
<p><del>[NOTE TO BLM: Adaptive management and monitoring language is still being developed at the national level, which includes off-site mitigation.]</del></p>	Use the national mitigation language or include a cross reference to the reader to find it in section 7.9 as part of the response too if needed.
<p>[BLM ACTION ITEM FOR FEIS: Change name of Table K-1 to be inclusive of other land use authorizations; not just oil and gas]</p>	Use the national mitigation language or include a cross reference to the reader to find it in section 7.9 as part of the response too if needed.
<p>I. [NEEDS SOLICITOR REVIEW] Proposed response: The regional mitigation strategy developed as part of this EIS process is consistent with its interim Management Policy regarding off-location mitigation as outlined in IM-2012-142, which was released on June 13, 2013.</p>	Red text of the mitigation language is provided if needed.
<p>Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the Utah GRSG LUPA/EIS and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.</p>	
<p>If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.</p>	
<p>Specific mitigation strategies, based on the Framework, will be developed by regional teams within one year of the issuance of the Record of Decision and be consistent with</p>	
<p>The RDFs were adopted from BMPs in Appendix D of the NTT report. In that appendix, it states that "BMPs are continuously improving as new science and technology become available and therefore are subject to change. Include from the following BMPs those that are appropriate to mitigate effects from the approved action." Wording from NNT report has been added to the discussion of RDFs in the FEIS.</p>	Assume NNT should be NTT?
<p>[NOTE TO BLM: BLM to examine whether the reliance upon RDFs constitutes a "reasonable" alternative. If BLM determines it is reasonable, this response should explain why that is so, and indicate that no change is made to the document. If BLM cannot justify Alternative D as "reasonable", this should be identified and Alternative D should be</p>	
<p>The BLM considers off-site mitigation a viable tool in the GRSG conservation strategy to facilitate mineral development.</p>	Add rationale as to why it is considered viable. The issue statement says that it is <b>not</b> viable.

The BLM considers off-site mitigation a viable tool in the GRSG conservation strategy to facilitate mineral development.

Requiring mitigation prior to leasing is not a viable management option because it would leave to the federal government to decide what can be leased based on mitigation requirements. BLM does not have the funds or workforce to pre-screen leases for mitigation requirements when there is no guarantee that the lease will be purchased or developed.

Regarding curtailment of mineral development, there needs to be a higher level (SOL) review of disturbance cap as it relates to all mineral development and mineral rights.

Appendix C and Appendix D of the Lewistown Field Office Greater Sage-Grouse DRMPA/DEIS contains required design features (RDFs) and best management practices (BMPs) that could be applied to non-energy leasables. The RDFs and BMPs are designed to protect GRSG habitat. The use and application of specific RDFs and BMPs would be made during the environmental analysis process for individual proposals on a case-by-case basis. [NOTE TO BLM: provide direction if additional language is necessary.] A monitoring framework was developed for the North Dakota Greater Sage-Grouse DRMPA/DEIS by a Disturbance and Monitoring Team. The framework focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM worked with Western Association of Fish and Wildlife Agencies (WAFWA) to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be "rolled up" for reporting monitoring results across the range of GRSG, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by RMP area; by the seven (WAFWA) GRSG Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the GRSG Conservation Objectives Team (COT) Report (USFWS 2013).

[NOTE TO BLM: Refer to the Monitoring Framework in the appendix in FEIS.] To accomplish effective monitoring, the BLM will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

The BLM did consider non-helioportable drilling BMPs for seismic operations in Alternative A (see Table 2-3, page 2-33). All alternatives in the North Dakota Greater Sage-Grouse EIS limit travel to existing roads and trails; therefore, geophysical



Plan	Issue Statement
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OR	The BLM has no authority to retire or terminate grazing permits.
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UT n/a

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto The DRMPA/DEIS is contrary to the Taylor

wn I/I Grazing Act.

ND 1/1 Animal Unit Month (AUM) is used incorrectly in the DRMPA/DEIS.

WY9

## Response

[Note to BLM: Please review for accuracy. May need to go up to solicitor's office for review.]

According to the Department of the Interior Solicitor's Opinion M-37008, dated October 4, 2002, "...the BLM has the authority to consider, through the land use planning process, a permittee's proposal to relinquish a grazing permit in order to end grazing on the permitted lands and to assign them for another multiple use. If the lands are within an established grazing district, BLM must analyze whether the lands are no longer "chiefly valuable for grazing and raising forage crops", as required under the Taylor Grazing Act, and express its rationale in a record of decision. The BLM must also consider whether the elimination of livestock grazing as a principal or major use of the public lands triggers congressional reporting requirements. A decision to cease livestock grazing is not permanent. It is subject to reconsideration, modification and reversal in subsequent land use plan decisions."

Additionally, under Section 4 of the Multiple-Use Conflict Resolution Act of 2005, a permittee or lessee may waive, at any time, a valid existing grazing permit or lease authorizing commercial livestock grazing on Federal lands. At which time, the Secretary of the Interior, at the request of the BLM, shall cancel grazing permits and leases waived under this section and permanently retire the associated grazing allotments from commercial livestock grazing, notwithstanding any other provision of law. The Multiple-Use Conflict Resolution Act of 2005 also authorizes the permittee to donate their valid existing grazing

n/a

n/a

n/a

n/a

The Lewistown Field Office Greater Sage-Grouse RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3). The BLM's planning processes allow for analysis and consideration of a range of alternatives in the DRMPA/DEIS that identified and incorporated appropriate regulatory mechanisms to conserve, enhance, and restore GRSG habitat and to eliminate, reduce, or minimize threats to this habitat to ensure that a balanced management approach was recommended. The DRMPA/DEIS includes alternatives that provide a greater and lesser degree of restrictions in various use programs, but would not eliminate or invalidate any valid existing development rights.

Consistent with the BLM's regulations (43 CFR 4130.2(a)) and Land Use Planning Handbook (H-1601-1, Appendix C(II)(B)), the Lewistown Field Office Greater Sage-Grouse RMPA makes appropriate land use planning decisions by identifying lands available or not available for livestock grazing (see DRMPA/DEIS Table 2-3, page 2-31). Further, the Lewistown Field Office Greater Sage-Grouse RMPA complies with the Taylor Grazing Act, which does not preclude the BLM from identifying some lands not available to



FLPMA [Sec. 4100.0-5] defines an AUM as "the amount of forage necessary for the sustenance of one cow or its equivalent for a period of 1 month." FLPMA [Sec. 4230.8-1(c)] states that "For purposes of calculating the fee, an animal unit month is defined as a month's use and occupancy of range by 1 cow, bull, steer, heifer, horse, burro, mule, 5 sheep, or 5 goats over that age of 6 months at the time of entering the public lands or other lands administered by the Bureau of Land Management, by any such weaned animals regardless of age; and by such animals that will become 12 months of age during the authorized period of use. No charge shall be made for animals under 6 months of age at the time of entering the public lands or other lands administered by the BLM; that are the natural progeny of animals upon which fees are paid, provided they will not become 12 months of age during the authorized period of use, nor for progeny born during that period."



Plan	Issue Statement
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OR Some commenters stated that the DEIS should have included a no grazing alternative as well as a 50% reduction from actual use in order to comply with NEPA requirements for a reasonable range of alternatives. Commenters questioned the need for additional restrictions on grazing management, citing that existing regulations and rangeland health standards protect GRSG habitat. They also question how the prioritization of rangeland health standard assessments would impact other species in the area.

Commenters question request clarification on the use of the HAF in the preferred alternative and how it correlates to rangeland health assessments. In particular, they noted the need to utilize local ecological site conditions and provided suggested details for implementation.

Commenters also request clarification on the requirements for fences.

Commenters questioned the rationale for

UT Several commenters requested an alternative that reduces or eliminates livestock grazing on public lands. However other commenters asserted the benefits of grazing in terms of fuel reduction and preservation of GRS habitat, and/or stated that it was not proven that grazing damages GRS habitat, or that there was any benefit to reducing grazing adjacent to burned areas. Many commenters expressed concern about the use of rangeland health standards, specifically whether they would be based on Connelly and Hagen's research, how clearly those standards and objectives would be stated, and how they would be enforced. Two commenters suggested using reference areas to judge habitat recovery or impacts of no grazing, and others suggested adaptive management and monitoring of grazing controls.

Commenters noted that conservation measures (RDFs/BMPs) applied to grazing permits should be appropriate for the vegetation or ecological potential of the area in question, and be implemented at the

ID-SW MT Several commenters requested that the LUPA/EIS provide specifics regarding habitat assessments schedules and standards, use of ecological site descriptions, require terms and condition for permits, and grazing restrictions for priority or general habitat. Two commenters suggested that BLM and Forest Service immediately close to grazing all allotments that fail to meet GRSG habitat objectives, and one commenter suggested that one of the alternatives should completely eliminate commercial grazing on public lands.

Commenters recommended that reduced utilization levels be further considered in alternatives. A commenter says that the BLM and Forest Service failed to take a hard look at removal of livestock from significant habitat areas. Commenters also requests clarification of the 25% reduction under Alternative F.

Multiple commenters requested that the alternatives require closure of voluntarily relinquished allotments.. Commenters questioned why changes to grazing management are needed when livestock

NV-CA Some California commenters pointed out that California grazing permittees are already subject to guidelines to protect GRSG, developed by NE CA SG Working Group. Therefore they oppose the guidelines in Alt D, and suggest that California allotments be removed from the geographic scope of NVCA EIS/LUPA. Another commenter requested that at least one alternative allow for expanding or retaining the current level of livestock grazing.

Multiple commenters claimed that the preferred alternatives threaten existing water rights under Nevada water law, and should be revised. Multiple commenters also stated that permanent retirement of grazing privileges is not authorized without Congressional action; other commenters suggested “resting” AUMs instead of retiring them. Multiple commenters noted that the use of Key Management Areas to monitor and adjust grazing conditions conflicts with the Nevada Rangeland Monitoring Handbook.

Some commenters requested that the entire burden of restoring/maintaining GRSG

NWCO Commenters were divided on what changes would need to be made to alternatives. Some commenters wanted alternatives for livestock grazing changed to be consistent with BLM's multiple use mandate, and incorporate range BMPs that are focused on sound range management. Other commenters wanted the livestock grazing alternatives to include terms and conditions for grazing permits that assure that sage-grouse habitat requirements are met, are consistent with NTT recommendations, and that conservation measures prevent adverse impacts from livestock range improvement projects on sage grouse habitat. Additionally, BLM should consider drought in the habitat objectives and apply BLM IM 2013-094.

Lewisto Many commenters noted an apparent  
wn 1/2 contradiction in the RMPA/DEIS, focused on  
the question of whether grazing in the LFO  
has an adverse effect on GRSG and habitat:  
Chapter 5 states that grazing does not  
constitute a substantial threat to GRSG  
because there are ongoing management  
actions in LFO intended to preserve GRSG  
habitat, however Alternatives B and D  
include further constraints on grazing, and  
Alternative C closes all habitat to grazing  
entirely. Commenters also requested more  
evidence from BLM supporting the assertion  
that grazing does, or does not, damage  
GRSG or GRSG habitat. More specific  
comments included: prioritizing habitat  
assessments and fence removals; Alternative  
C does not meet the Purpose and Need  
because it does not allow for connectivity,  
population expansion, or historic habitat; the  
suggestion that grazing restrictions be  
limited to timing/intensity rather than  
reductions in AUMs; and several citations in  
support of the assertion that leaving grazing  
areas fallow in the long term results in re-  
establishment of native forbs and grasses.



Lewisto  
wn 2/2

ND Commenters had two opposing views regarding the range of alternatives related to livestock grazing. One group felt the BLM has inadequately justified the need to change existing, or propose new, livestock grazing management actions in order to protect sage-grouse. The other group requested the BLM include more restrictive management actions for livestock grazing, including analyzing a no grazing alternative and 50% reduction from actual use in permitted grazing. The DRMPA/DEIS fails to provide any rationale for adopting State of North Dakota habitat parameters instead of peer-reviewed scientific literature.

WY9

## Response

The EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA, as described in Section 4.3, NEPA Range of Alternatives, in this section. ~~The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. The BLM complied with CEQ regulations in developing the range of alternatives, including a no action alternative, and the spectrum of actions considered all meet BLM regulations, policy and guidance. The DEIS considered a full range of alternatives for grazing levels, including Alternative A, which proposed no reduction in grazing levels, Alternative C, which analyzed no grazing in the planning area, and Alternative F, which analyzed a reduced grazing level of 62.5%. See Section 2.9 for a complete comparison of alternatives.~~

All or part of Key RNAs identified in the Final EIS would be closed under the preferred alternative to all disturbance types, including livestock grazing, OHV, minerals development, and lands and realty actions. The reason for these closures would be for research related activities, including studying vegetative communities that do not contain land disturbing activities which are important to sage-grouse, as well as studying the effects of climate change on these vegetative communities. For all remaining ACECs and RNAs, ~~for~~ areas not meeting rangeland health standards where livestock grazing is a contributing factor, **or areas** are not meeting the management goals of the ACEC/RNA, grazing would be modified before the next grazing season. The intent of the land use plan amendment is to change management under all resource programs, where necessary, to benefit Sage Grouse habitat.

The document has been updated to remove the ACEC/RNA voluntary relinquishment clause. Objectives and actions from Appendix I have been moved into the body of the document for the FEIS for better clarification for the reader. Changes have been made to Chapters 2, 3, and 4 to clarify the proposed alternatives. Impacts from any additional fencing required in Key RNAs have been updated in Chapters 4 and 5. The RMPA/EIS has also been updated by removing the 20% PPMA and 50% PGMA habitat thresholds for RNAs. This was a method used in the Draft EIS as a way to filter out potential areas of

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/EIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DLUPA/DEIS identified GRS habitat objectives, percent cover, residual cover, and grasses and forb heights.

In accordance with IM 2012-069 and BLM's Land Use Planning Handbook, the DEIS considered what range of alternatives was necessary to address unresolved conflicts among available resources. Alternative C1 eliminates grazing entirely within occupied habitat and Alternative C2 reduces grazing in occupied habitat accordingly.

Habitats will be managed to meet habitat guidelines from scientific literature (e.g., Connelly et al. 2000 and Hagen et al. 2007), where such standards can be met. Adjustments from the guidelines may be made, but must be based on documented regional variation of habitat characteristics (e.g., sagebrush type, ecological site potential), quantitative data from population and habitat monitoring, and evaluation of local research. A toolbox of permit conditions and conservation measures such as RDFs and BMPs would be available to District Managers to choose from when granting or renewing grazing permits, as applicable for each individual allotment within priority habitat. Blanket, one-size-fits-all standards and objectives would not be imposed on permittees under the amended RMPs.

Increased grazing and associated AUMs was considered in Section 2.8.1 in the DEIS, but was eliminated from detailed analysis.

While livestock grazing was not recognized as a primary threat to GRSG, it is included on the USFWS list of potential threats, therefore, adjustment to grazing management actions are applied accordingly.

The ID/SWMT LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. The BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and Forest Service regulations, policy and guidance. Alternatives including reduction/removal of livestock grazing were considered due to the identification by the USFWS of livestock grazing as one factor threatening GRSG.

Grazing use would be modified when it is identified as the cause for not meeting Sage Grouse objectives. The intent of the land use plan amendment is to change management under all resource programs, where necessary, to benefit Sage Grouse habitat. Standards and Guidelines include examination of causal factors for factor 8 of RHS in determination [BLM please revise language as needed]

As stated in the preferred alternative [mgmt. action #] habitat objectives would be adjusted based on ecological site conditions. Site specific requirements would be specified in NEPA for permit renewal. Language in the preferred alt. has been modified to clarify. [site pp of languages]

Reduction in AUMs under Alternative F would be specified in site specific decisions at the permit renewal level. Language in the FEIS for Alternative F reduction has been clarified

[BLM and Forest Service- need to review the language in Alt F mgmt. actions related to the 25% reduction and review related analysis. Determine if revision needed to table 4-5].

[need to include language on hard-look at reduction in grazing – Nika drafting]

Neither the Taylor Grazing Act nor FLPMA requires that all uses be allowed on all areas of the public lands. The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people.

- Unless the State Director determines otherwise, the planning area for a RMP is the geographic area associated with a particular field office (43 CFR 1610.1(b)). The geographic scope of this planning effort includes the Northeast California grazing allotments; if habitat assessments indicate that GRSG habitat in those areas is meeting objectives, few changes are likely to be made to grazing conditions for those permits.

[BLM needs to develop an answer to the Water Law question.]

- The monitoring approach identified in the LUPA/FEIS complies with the Nevada Monitoring Handbook (2006).
- As noted above in Section 4.3 of this Report, Section 2.3 of the Draft EIS describes how the Utah GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives.
- Neither the Taylor Grazing Act nor FLPMA requires that all uses be allowed on all areas of the public lands. The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The purpose of the multiple-use mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its Resource Management Plans (RMPs), which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.
- Grazing use would be modified when it is identified as the cause for not meeting Sage Grouse objectives. The intent of the land use plan amendment is to change management under all resource programs, where necessary, to benefit Sage Grouse habitat.

- Funding and scheduling of district-level assessment efforts is outside the scope of this program-level NEPA process. However, as a result of this LUPA Land Health Assessments will become a priority in GRSG habitat.

- The proposed habitat objectives for Sage Grouse and the guidelines for establishing allowable use levels if not meeting those objectives were developed based on the most current science (including USGS, NDOW, Connelly and Hagen's sage grouse habitat standards), and would be used to assess rangeland health of allotments prior to granting or renewing grazing permits. A toolbox of permit conditions and conservation measures such as RDFs and BMPs would be available to District Managers when granting or renewing grazing permits, as applicable for each individual allotment within priority habitat. The Preferred Alternative provides for an adaptive management approach on a case by case basis to protect GRSG habitat when GRSG habitat is not meeting GRSG habitat objectives. Part of this is continuing land health assessments in PPMA and PGMA

BLM will edit LG 4 to say prioritized because of IM-2012-43 and other IMs.

Current policy carried out throughout all alternatives directs the districts to identify and mitigate hazard fences.

The Preferred alternative provides for 35-40% utilization while not meeting LHS and when meeting will monitor to protect GRSG habitat.

LG 10 and table 2-7 address PFC requirements and habitat conditions

BLM and FS will comply with Nevada Water Law.

BLM will add a discussion that implementation level management is defined and addressed during the annual grazing application process.

BLM will edit text to clarify that management actions will be taken only when habitat objectives are not trending upward and grazing is the responsible cause.

BLM will add a response about targeted and prescriptive grazing (LG13 and Veg alts).

As noted above in the Section 4.3 of this Report, Section 2.3 of the Draft EIS describes how the Northwest Colorado GRSG RMPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the RMPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the four alternatives are described in Table 2-2, Comparative Summary of Alternatives, in Section 2.8, Summary Comparison of Alternatives, of the Draft EIS.

Additionally, Sections 4.3 and 7.5 of this report discuss how the BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and FS regulations, policy and guidance.

During the development of the Final EIS, the BLM and FS met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the

The BLM considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and GRSG in the planning area, the BLM fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, four alternatives were analyzed in detail in the DRMPA/DEIS that best addressed the issues and concerns identified by the affected public. The range of alternatives in the DRMPA/DEIS represented a full spectrum of options including a no action alternative (current management, Alternative A). The range of alternatives is based upon analysis of public scoping comments as well as information provided in the NTT report, the BER, the COT report, the Montana Strategy, and relevant peer-reviewed scientific research. The alternatives represent different degrees of and approaches to balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, while sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.

Alternatives B and D are not intended to eliminate grazing in the planning area altogether, but to provide management options to further preserve GRSG habitat if it is determined that the current strategies are not sufficient. Habitat objectives provided in the Management Plan and Conservation Strategies for Sage-Grouse in Montana Plan (2005) will be incorporated into Standards and guidelines for rangeland health under Alternatives B and D. Whether or not standards are being met will be determined prior to renewing grazing authorizations. A toolbox of permit conditions and conservation measures such as RDFs and BMPs (Appendix C and D) would be available to Managers to choose from when granting or renewing grazing authorizations, as applicable for each individual allotment within priority habitat.

[NOTE TO BLM: need to review new citations to see if there is more that can be included regarding the science of grazing vs. GRSG.]

Regarding statements that current grazing levels leading to land health issues: All grazing allotments within the planning area including those in GRSG habitat that were determined to not be meeting land health standards due to livestock grazing have had management changes implemented, as demonstrated in Table 3-45(Lewistown Field Office Planning Area – Land Health Assessment) and discussed in the DEIS pp 3-66. Previously completed site specific EAs to renew grazing authorizations are



Neither the Taylor Grazing Act nor FLPMA requires that all uses be allowed on all areas of the public lands. The BLM's FLPMA (Section 103(c)) defines "multiple use" as the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people. Accordingly, the BLM is responsible for the complicated task of striking a balance among the many competing uses to which public lands can be put. The purpose of the multiple-use mandate is to require the BLM to evaluate and choose an appropriate balance of resource uses which involves tradeoffs between competing uses. The FLPMA also directs the BLM to develop and periodically revise or amend its RMPs, which guide management of BLM-administered lands, and provides an arena for making decisions regarding how public lands would be managed and used.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data or identification of site-specific actions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, etc. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.

Removal and marking of specific fences is an implementation level action and would not be addressed in the FEIS. However, fences within GRSG PH and GH are currently being evaluated, mapped, and marked with the priority on fences with high and moderate collision risks as determined by using the NRCS developed Fence Collision Risk Tool GIS application. These efforts have been incorporated into the cumulative effects analysis found in Chapter 4.

As stated on page 2-3 (Section 2.3.1) of the DRMPA/DEIS, the alternatives “meet the purpose and need for the North Dakota Greater Sage-Grouse RMPA.” The RMPA is a targeted amendment specifically addressing goals, objectives, and conservation measures to conserve GRSG and to respond to the potential of it being listed (see DRMPA/DEIS Section 1.2, Purpose and Need, on page 1-3).

Section 2.3 of the North Dakota Greater Sage-Grouse DRMPA/DEIS describes how the North Dakota Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the 1988 North Dakota RMP, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the 1988 North Dakota RMP and ROD are acceptable and reasonable.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. Meaningful differences among the four alternatives are described in Table 2-2, Comparative Summary of Alternatives, in Section 2.10, Summary Comparison of Alternatives, of the DRMPA/DEIS.

As stated in Section 2.8.2, Eliminate Livestock Grazing from BLM-Administered Lands, in the DRMPA/DEIS, an alternative that eliminated livestock grazing on BLM-administered lands in the planning area was not analyzed in detail. In accordance with IM 2012-169 and BLM’s Land Use Planning Handbook, the BLM considered what range of alternatives was necessary to address unresolved conflicts among available resources. As a result of this process, an alternative reducing grazing use by 50 percent in the Big Gumbo area was developed in coordination with the USFWS and NDGFD. No issues or conflicts have been identified during this land use planning effort that require the complete elimination of livestock grazing within the planning area for their resolution. Where appropriate, removal of livestock and adjustments to livestock use, have been incorporated into this planning effort. Because the BLM has considerable discretion through its grazing regulations to determine and adjust stocking levels, seasons-of-use, and grazing management activities, and to allocate forage to uses of the



Review issue statement for opinions and reword or remove as needed. Consider consolidating issue statement to reflect condensed nature of response.

Many of the issue statements sound like opinion or voting. Reword or remove as appropriate.

Both issue statement and response sound as if written comment by comment. Please consolidate.

Many of the issue statements sound like opinion or voting. Reword or remove as appropriate.

Both issue statement and response sound as if written comment by comment. Please consolidate.

Plan	Issue Statement
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OR 1/2 Multiple commenters asserted and presented citations supporting their position that grazing benefits GRSG and helps prevent fires. Other commenters presented citations supporting the position that grazing damages GRSG habitat and other environmental resources. Some commenters stated that there are no studies that tie appropriately managed livestock grazing to population changes in GRSG. Both sets of commenters claim that the EIS fails to adequately support its conclusions regarding the potential harm to GRSG habitat posed by grazing.

Multiple commenters request clarification of the data presented in Appendix N, including dates for which LHA were conducted. Commenters request that the data in section 3.7 and Appendix N be checked and revised for consistency.

OR 2/2

UT Commenters disagree on whether science has determined if livestock grazing damages GRSG habitat or affects wildfire frequency; commenters on both sides of the question offer references and citations, and/or claim there is no science supporting the opposing position. Multiple commenters call for a comprehensive peer-reviewed study to answer the question before BLM/FS implements any changes to grazing management.

Some commenters assert that properly managed grazing (controlled for time, location, and intensity) can protect GRSG habitat and reduce fire risks.

Several comments refer to the Duck Creek OHA ruling, in which the BLM's RH assessments and grazing management decisions were found to be legally insufficient.

Several commenters emphasize site-specific data: BLM should not average grazing utilization across pastures, ecosystems, and



ID-SW MT Multiple commenters asserted and presented citations supporting their position that grazing benefits GRSG and helps prevent fires. Commenters suggested that GRSG habitat could be improved by reducing cheatgrass. Other commenters presented citations supporting the position that grazing damages GRSG habitat and other environmental resources. Both sets of commenters claim that the EIS fails to adequately support its conclusions regarding the potential harm to GRSG habitat posed by grazing.

One commenter states that the DEIS failed to include analysis of impacts to ecological resources and economics.

Additionally, lack of ability to adapt to changing conditions was noted.

Several commenters requested more detailed information about current grazing management and habitat conditions in the planning area. Other commenters noted that ongoing collaboration between private ranchers and federal agencies has helped preserve GRSG habitat and should be acknowledged in the EIS.

NV-CA Commenters question the applicability of habitat objectives in Table 2.6. Multiple commenters requested that the EIS discuss the difference between permitted and actual AUM use, and explain that the failure to use all of one's permitted AUMs is often outside the control of a permittee. Several commenters disputed specific suggested habitat objectives, or recommended the use of the Nevada and California Rangeland Monitoring Handbook for monitoring guidelines and procedures. Several commenters disputed the economic data provided as a baseline for analysis. One commenter noted a discrepancy in the data in Tables 3.33 and 3.31 with regards to the acres meeting land health standards. Regarding the justification from the Increased Grazing Alternative, one commenter stated that "It is equally true that there are currently no science-based studies that demonstrate that decreased livestock grazing on public lands would enhance or restore GRSG habitat or maintain or increase GRSG abundance and distribution".

NWCO The BLM needs to consider the additional referenced information in the EIS.  
Reisner, M. D., J. B. Grace, D. A. Pyke, P. S. Doescher. 2013. Conditions favouring Bromus tectorum dominance of endangered sagebrush steppe ecosystems. Journal of Applied Ecology, available at <http://onlinelibrary.wiley.com/doi/10.1111/1365-2656.12097>

Lewisto Multiple commenters requested that the  
wn RMPA/DEIS be amended to include  
allotment-level rangeland health data,  
allotment-level analyses of standards and  
guidelines implementation, and detailed  
descriptions of current grazing and habitat  
conditions in the planning area.

Multiple commenters asserted that  
appropriately-managed grazing is beneficial  
to GRSG and GRSG habitat.

ND The DRMPA/DEIS provides conflicting information on the impacts to sage-grouse from fences versus other range improvements that maintain or improve rangeland health. The DRMPA/DEIS fails to adequately disclose existing livestock grazing use.

WY9

## Response

~~As noted in Section 4.4 of this report, before beginning the Oregon Greater Sage-Grouse RMPA/EIS and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Oregon sub-regional planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad-scale analyses required for land use planning.~~

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, grazing permit renewals, range improvement projects, and wild horse and burro gathers. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.~~

~~The BLM has reviewed references provided in public comments and incorporated them as appropriate. [NOTE TO BLM: Review suggested references to determine if/where information in EIS needs to be updated]~~

Section 3.7, Livestock Grazing/Range Management, discusses the current level of grazing in the planning area and management systems in place. It has been updated to include a discussion on the process used to determine if an allotment is located within GRSG habitat, trend information recorded within rangeland health assessments, and that only a portion and not an entire allotment may not be meeting rangeland health standards. Impacts of current and historic grazing on other resource and resource uses are discussed under the appropriate resource and resource use headings (e.g., Section 3.2, Greater Sage-Grouse and Sage-Grouse Habitat).

[NOTE TO BLM: Update Section 3.7 to include language on GIS exercise to determine which allotments are in GRSG habitat, trends information from rangeland health assessments, and to clarify that only a portion of an allotment may not be Section 3.7 has been reviewed for consistency with Appendix N and updated as needed. Appendix N and Tables 3-24 and 3-25 identify the name and number of the allotments within GRSG habitat, authorized AUMs, acres within PGH and PPH, management categories, and ratings for each of the 5 rangeland health standards. Allotments that have not completed rangeland health assessment to date have been added to Appendix N. The information contain in these sections is appropriate for a land use planning amendment. Additional details for these allotments may be required at a project-level scale and will be assessed at that time. Section 2.10, Summary of Environmental Consequences, has also been updated to add clarification to impacts under Alternative A. [NOTE TO BLM: Review Chapter 3 data in comparison with Appendix N and update as needed for consistency. Update pg. N-1 to clarify between rangeland health standards that do not apply to that particular assessment from those assessments that have not been completed. Expand paragraph on pg. 2-110 starting with “Alternative A has a low probability...” to describe rationale for statement or remove paragraph.]

Section 2.4, Resulting Range of Alternatives, contains a definition of improper livestock grazing, and any allotment that fails to meet rangeland health standards would be considered to be improperly grazed. The livestock grazing objectives in the RMPA/EIS contains methods to correct improper grazing management.

[Note to EMPSi: Add to livestock grazing paragraph on pg. 2-21: “Where rangeland health standards are not being met due to livestock, the BLM could require changes in livestock grazing practices at the allotment level, including adjusting permits and other necessary actions to make progress towards meeting rangeland health standards.”]

[NOTE TO BLM: Need to consider if Appendix N will include dates for rangeland health assessments. If not, please provide reasoning for not including dates in this response and suggest including a footnote in table in Appendix N]

As noted in section 4.4 of this report, before beginning the Utah Greater Sage-Grouse DLUPA/DEIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. ~~The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The data provided in the DLUPA/DEIS is sufficient to support, at the general land use planning level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/DEIS. A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering of data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12—Land Management Planning). The BLM and the Forest Service considered new information and revised the FEIS as necessary, including Sections XXXXX [NOTE TO BLM: Update this sentence if new information was added to FEIS, or delete if no new information was added.]~~

The Duck Creek OHA ruling is under continued litigation and **cannot be used as case law until the final decision has** ~~yet to~~ be made.

Before beginning the LUPA/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Idaho-Montana planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives. The BLM and Forest Service have reviewed references provided in public comments and incorporated them as appropriate. [BLM and Forest Service need to review suggested references comment by comment to determine if/where info in EIS needs to be updated]

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, grazing permit renewals, range improvement projects, and wild horse and burro gathers. The subsequent NEPA analyses for project-specific



The BLM and the Forest Service should have a variety of peer-reviewed publications to provide the best available science as the basis for management.

Application of grazing management actions in Table 2.7 result from implementation level analysis, not the broad scale approach of this LUPA.

Before beginning the LUPA/EIS and throughout the planning effort, the BLM and the Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the Nevada-Northeast California planning area are substantially different than the data needed to support site-specific analysis of projects. The LUPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

BLM added language referencing the Nevada and California Monitoring Handbook for monitoring guidelines and procedures in Table(s) 2.XX.

The BLM and the Forest Service used the most recent and best information available that was relevant to a land-use planning-level analysis including the Baseline Environmental Report (BER; Manier et al. 2013). The BER assisted the BLM and the Forest Service in summarizing the effect of their planning efforts at a range-wide scale, particularly in the affected environment and cumulative impacts sections. The BER looked at each of the threats to greater sage-grouse identified in the Fish and Wildlife Service's "warranted but precluded" finding for the species. For these threats, the report summarized the current scientific understanding, as of report publication date (June 2013), of various impacts to greater sage-grouse populations and habitats. The report also quantitatively measured the location, magnitude, and extent of each threat. These data were used in the planning process to describe threats at other levels, such as the sub-regional boundary and WAFWA Management Zone scale, to facilitate comparison between sub-regions. The BER provided data and information to show how management under different alternatives may meet specific plans, goals, and objectives.

Additionally, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and [NDOW, CDFW]. Considerations included but were not limited to [list the types of data or GIS layers that were gathered/used. A few examples: threatened and endangered species and their habitats, water quality- limited (303d) streams, deer and elk herd management areas, invasive

The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendices including [cite appendix(es)] in the Nevada and Northeastern California DLUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, grazing permit renewals, range improvement projects, and wild horse and burro gathers. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.

BLM staff have reviewed the suggested studies and revised both the affected environment section and the impacts analysis of grazing and livestock management to reflect new studies and provide a more balanced approach regarding the environmental impact of livestock grazing on public lands, wildfire management, and wildlife habitats.

The EIS/LUPA will be amended to explain in more detail about permitted versus actual AUMs.

As noted previously in Section 4.4, Best Available Information, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment. Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...

*[NOTE TO BLM: If the information is essentially the same, then state this. If there were references that you determined were truly new, then note that they were included in the FEIS and if possible, provide the specific locations where.*

*Currently under review by BLM.]*

As noted in section 4.4 of this report, a land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The BLM will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, grazing conditions, etc. The subsequent NEPA analyses for project specific actions will tier to the land use planning analysis and evaluate project impacts at the appropriate site specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site specific actions.

Regarding statements that current grazing levels leading to land health issues: All grazing allotments within the planning area including those in GRS habitat that were determined to not be meeting land health standards due to livestock grazing have had management changes implemented, as demonstrated in Table 3-45 (Lewistown Field Office Planning Area – Land Health Assessment) and discussed in the DEIS pp 3-66. Previously completed site specific EAs to renew grazing authorizations are discussed in the DEIS pp 3-65. The FEIS has been updated to include additional information on existing site specific EAs and corresponding land health determinations for clarity. In addition DEIS Pp. 3-67 lists order for grazing permit renewals and Figure 3-7, Resource Activity Plans – Grazing Authorization Renewal Areas, in Appendix A shows renewal locations relative to GRS habitat.

[Change to FEIS-Need to update the text on pp 3-65 to include the following: All grazing allotments within the planning area including those in GRS habitat that were determined to not be meeting land health standards due to livestock grazing have had management changes implemented. Details of management changes can be viewed in site specific EAs and land health determinations, available at: [http://www.blm.gov/mt/st/en/fo/lewistown\\_field\\_office/Watershed\\_Plans.html](http://www.blm.gov/mt/st/en/fo/lewistown_field_office/Watershed_Plans.html)]

[Note to BLM- need to check on data from NRCS/SGI study near Round-up Mt to determine if should incorporate info response and/or FEIS]

Fences can have both beneficial and adverse impacts on GRSG depending on their location and distance from leks. As described in Table 2-3, Description of Alternatives A, B, C, and D, (pages 2-32 and 2-33 of the DEIS) fences can impact GRSG differently depending their proximity to a lek, the size of a lek, and the surrounding topography. However, fences can also be beneficial for range management. The BLM will evaluate all fences during permit renewals for their impacts to GRSG and make adjustments at this site-specific NEPA level.

~~The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 is sufficient to support, at the general land use planning level of analysis, the environmental impact analysis resulting from management actions presented in the DRMPA/DEIS.~~

~~A land use planning level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan level decisions. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions. The BLM will conduct subsequent project specific NEPA analyses for projects proposed for implementation under the land use plan amendment. These subsequent NEPA analyses will tier to the land use planning analysis and evaluate project impacts at the site specific level (see 40 CFR 1502.20 and 1508.28). Before beginning the land use plan amendment process and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan level. Much of the data in the DRMPA/DEIS is sufficient to support the gross scale analyses required for land use planning.~~

The existing condition within the 28 grazing allotments are discussed in Section 3.13.2, Conditions on BLM-administered



Appears that some of the issue statements don't have a response #2 sounds like opinion rather than a statement that BLM failed to consider it and should have.



Both issue statement and  
response sound as if written  
comment by comment. Please  
consolidate.







Add cross reference to section  
4.4 for general NEPA  
requirements (see other  
responses).

Plan	Issue Statement
OR	<p>Commenters stated that the impacts analysis did not fully account for the indirect changes related to loss of public AUMs, including related changes to private lands and overall reduction in ranch herd size.</p> <p>Other comments requested additional analysis of the impacts of current management on grazing to allow for more complete comparison between alternatives.</p> <p>One commenter notes that limitations on water developments can have impacts on grazing management and need to be clarified and analyzed in greater detail.</p>
UT	<p>Several commenters requested updated AMPs that incorporate specific objectives for GRSG and habitat; and requiring a GRI score of 0 or better for allotments meeting rangeland health standards.</p> <p>Some commenters want BLM to study beneficial impacts of grazing, because reducing grazing would disrupt use of the range, impede construction of range improvements, cause other administrative effects. DLUPA should address effects on management of checkerboarded land if</p>
ID-SW MT	<p>Multiple commenters noted that one possible impact of reducing grazing on public lands would be the increase of grazing on private lands, or the conversion of private range lands to other land uses because ranching is made uneconomical.</p> <p>Other comments detailed beneficial impacts of grazing, and the adverse impacts of grazing restrictions on livestock operations, Rangeland Fire Protection Associations, and the local economy.</p> <p>One commenter notes that limitations on water developments can have impacts on grazing management and need to be clarified and analyzed in greater detail.</p>

NV-CA vMultiple commenters noted that Alternative A has ongoing range management regulations that have adversely affected livestock grazing (both AUMs and economic benefits), and those impacts should be discussed in the EIS. Multiple commenters also stated that the conclusion that Alternatives B, D, and E would cause no further reduction in actual livestock use (and therefore no economic impact) is unsupported. Multiple commenters noted that the adverse economic impacts of Alternative C were not sufficiently developed, and/or were under-estimated. One commenter noted that the road closures associated with every alternative would interfere with grazing, and this should be discussed in the EIS. Two commenters pointed out that Alternative C would disturb GRSG habitat and would not prevent damage from wild horses and burros; multiple commenters noted that cattle, wild horses and burros, and other herbivores all have different impacts on GRSG habitat and those differences should be acknowledged in the

NWCO The BLM failed to provide adequate analysis of the impacts from the alternatives on livestock grazing, as well as the effects of livestock grazing on sage grouse and its habitat.

Lewisto wn Commenter suggests the DRMPA/DEIS be amended to include more detailed analysis on the following issues: grazing as a surface-disturbing activity and the difficulty of setting guidelines when grazing utilization is averaged across pastures, species, and seasons.

ND The BLM failed to explain how and why reduced grazing in the Big Gumbo area translates to meaningful biological benefits for sage-grouse under Alternative C compared to Alternatives B and D. The DRMPA/DEIS fails to include erosion on grazed lands compared to non-grazed lands in the analysis of erosion related to livestock management. The DRMPA/DEIS inaccurately states that livestock grazing is a 'diffuse' form of biotic disturbance that exerts repeated pressure over many years on a system.

WY9

## Response

Impacts on livestock grazing from current livestock grazing management are addressed in Section 4.7, Livestock Grazing/Range Management. Impacts on the social and economic aspect of livestock grazing are discussed in Section 4.19, Social and Economic Impacts (Including Environmental Justice). Cumulative impacts on livestock grazing are addressed in Section 5.1.8, Livestock Grazing/Range Management. All of these sections have been updated to include a more thorough discussion of impacts based on issues brought up by commenters.

[Note to BLM: Review comments 0093-151, 0093-77, and 0220-24 to make sure those issues are addressed.

Update paragraph on pg. 4-74 “Water developments...” to cover how managed livestock grazing, including developments, can maintain and improve rangeland health.]

As required by 40 CFR 1502.16, the RMPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the

As required by 40 CFR 1502.16, the DLUPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the

Impacts to livestock grazing from current livestock grazing management is addressed in section 4.9.4. Impacts to the socioeconomic aspect of livestock grazing is discussed in Section 4.19.

As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The Final LUPA/EIS will provide sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS’s impact analysis relevant to grazing and indirect socioeconomic impacts and was found to need additional information and support for the conclusions/findings. The BLM and the Forest Service have updated this information in the Proposed Land Use Plan Amendment/FEIS to provide the necessary information to make informed land use plan-level decisions. Specifically, [BLM/Forest Service-insert a summary of the information that was updated and include a

Impacts to livestock grazing from current livestock grazing management is addressed in section 4.9.4. Impacts to the socioeconomic aspect of livestock grazing is discussed in Section 4.19. • The Socioeconomic tables in the LUPA/DEIS analyze land use planning level changes under all alternatives to billed AUMs. While only alternatives C and F propose land use planning changes to AUMs all of the alternatives could potentially adjust AUMs through implementation level planning if range land health standards and Sage Grouse objectives are not being met. • No road closures have been proposed during this land use planning process, however, during travel management implementation planning road closures may be proposed and will be analyzed in subsequent analysis. • As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1. • Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions. • As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The Final

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific



Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions. [NOTE TO BLM: use this response if no changes were made in FEIS.]

While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS's impact analysis relevant to grazing and water quality was found to need additional information and support for the conclusions/findings. The BLM has updated this information in the Proposed RMPA/FEIS to provide the NOTE TO BLM/EMPSi: recommend revising the COT Report Threats – Grazing and Range Management Structures section of Alternative C in the GRSG section of Chapter 4 of FEIS to provide more specific impacts to GRGS from reducing AUMs in Big Gumbo area.

The DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

The impacts from livestock grazing on soils are discussed in Section 4.16; impacts from the management actions and conservation measures on leasable mineral development are discussed in Section 4.8.

Of the suggested studies and references put forth by the commenters related to grazing and rangeland health, the BLM

Disconnect between issue statement and response. Response needs to address topics brought up in the issue statement.

Both issue statement  
and response sound as if  
written comment by  
comment. Please  
consolidate.

Plan	Issue Statement
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OR	n/a
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UT	n/a
----	-----

ID-SW	n/a
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MT	
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NV-CA	Multiple commenters stated that the increasing use of Key Management Areas should be discussed as a cumulative impact. Other issues that commenters requested be added to the cumulative impacts discussion included: past declines in grazing and AUM utilization; loss/fragmentation of habitat as unprofitable ranches are sold on the private market; over-grazing from wild horses and burros and their contributions to habitat damage.
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NWCO BLM failed to include the direct and indirect cumulative impacts of the sage grouse actions on the livestock industry or the impacts of the actions on private lands.

Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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## Response

n/a

n/a

n/a

The BLM and the Forest Service thoroughly explained its consideration and analysis of cumulative effects in the DLUPA/EIS in Section XX.XX. The DLUPA/EIS considered the present effects of past actions, to the extent that they are relevant, and present and reasonably foreseeable (not highly speculative) Federal and non-Federal actions, taking into account the relationship between the proposed alternatives and these reasonably foreseeable actions. This discussion summarizes CEQ guidance from June 24, 2005, stating that "[g]enerally, agencies can conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions." This is because a description of the current state of the environment inherently includes the effects of past actions. Information on the current conditions is more comprehensive and more accurate for establishing a useful starting point for cumulative effects analysis. The CEQ interpretation was accepted by the Ninth in *NW Env'tl. Advoc. v. Nat'l Marine Fisheries Serv.*, 460 F.3d 1125, 1141 (9th Cir. 2006). The BLM and the Forest Service explicitly described their assumptions regarding proposed projects and other reasonably foreseeable future actions. On Forest Service-administered lands, reasonably foreseeable actions are those that would occur under their current land use plans from a broad-scale perspective. The BLM and the Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning. The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. Impacts from the wild horse and burros on livestock grazing are identified in Section 4.9. Site specific analysis of grazing use is conducted as part of the land health assessment process. However the BLM and the Forest Service have updated the information in the Proposed Land Use Plan Amendment/FEIS to provide the necessary information to make informed land use plan-level decisions. Specifically, a more comprehensive list of cumulative projects, past and future, has been developed, and used to support a more detailed analysis of cumulative impacts.

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

The impacts from livestock grazing on sage grouse and its habitat are discussed in Section 4.4.2; impacts from the management actions and conservation measures on livestock grazing are discussed in Section 4.12. The socio-economic

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	<p>Multiple commenters noted that as designed, Alternative D is not flexible enough to allow for adaptive management, and suggested a ten-year plan to meet habitat objectives. Adaptive management techniques should be specifically described in the LUPA/EIS. Multiple commenters urged BLM and the Forest Service to schedule and monitor RHS assessments, perhaps by developing Allotment Management Plans in coordination with permittees.</p>
NWCO	<p>The DEIS lacks specificity to explain how the BLM will monitor for and treat invasive species associated with existing range improvements in sage grouse designated habitat.</p>

Lewisto wn Commenters suggested that the relative success of standards and guidelines established to protect GRSG habitat be assessed more frequently than at ten-year intervals. Also, commenters suggested that the RMPA/DEIS be revised to draw a clear connection between studies identifying healthy GRSG habitat and the standards and guidelines intended to achieve such habitat.

ND n/a  
WY9



## Response

n/a

n/a

n/a

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions.

District-specific adaptive management techniques or Rangeland Health Standards assessments would not be appropriate to include in the LUPA/EIS; these schedules, assessments, and monitoring protocols would be developed at the district level, in coordination with local stakeholders and permittees.

As noted previously in Section 4.6 of this Report, land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions.

Mitigation, adaptive management and a monitoring framework were developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013).

*[Refer to the Monitoring Framework in the appendix.]* To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat

Funding and scheduling of district-level assessment efforts is outside the scope of this planning-level NEPA process. Habitat assessments may be conducted on a schedule determined by the District Manager, depending on resource availability, and could include evaluations more frequently than once every ten years. However the imposition of new or modified standards and guidelines would necessarily be tied to grazing permit renewals, which come only at ten-year intervals, and thus assessing the success of the conditions more frequently than that would not add much value.

Rangeland health standards would be developed at the district level, based on the most current science (including Connelly and Hagen's sage grouse habitat standards), would be tailored to local conditions, and would be used to assess rangeland health of allotments prior to granting or renewing grazing permits. A toolbox of permit conditions and conservation measures such as RDFs and BMPs would be available to District Managers to choose from when granting or renewing grazing permits, as applicable for each individual allotment within priority habitat. Blanket, one-size-fits-all standards and objectives would not be imposed on permittees under the RMPA.

Regarding implementation of structural range improvements and fences, fences within ph and gh are currently being evaluated, mapped and marked with the priority for modification of fences with high and moderate collision risks as

n/a



Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO The USFWS requested some additional mitigation measures to be considered in the range of alternatives for locatable minerals (mining operations).

Lewistow n/a

ND n/a

WY9

## Response

n/a

n/a

n/a

n/a

As discussed previously under Sections 4.3 and 7.5 of this report, the BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and Forest Service regulations, policy and guidance.

During the development of the Final EIS, the BLM and FS met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and impacts analysis (see Sections XXX of the FEIS).

*[NOTE TO BLM: Not sure if further explanation regarding the changes made based on consultations with USFWS seeing as the comments are specific to the USFWS recommendations. May need to further refine the response based on outcome of meetings with*

*USFWS Possible NCT response???*

n/a

n/a



Plan	Issue Statement
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OR	The BLM does not have authority to manage mining operations on split-estate lands (neither where the surface is BLM-administered land and the underlying mineral estate is private nor where the surface is private and the underlying mineral estate is administered by the BLM). Commenters recommend withdrawal from PPMA and PGMA.
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UT	Commenters noted that the alternatives should take site-specific conditions into account when prohibiting or allowing locatable mineral activities.
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ID-SW n/a

MT

- NV-CA
1. The BLM should include additional management actions (including mitigation measures or withdrawal) to ensure that relocation of sage-grouse due to mineral extraction is not permanent.
  2. The BLM should clarify the meaning of effective mitigation and how mitigation will minimize the loss of PPMAs.

NWCO n/a

Lewisto The BLM needs to consider additional  
wn actions or clarifications to existing actions within the range of alternatives, withdrawals, closures, and timing restrictions.

ND n/a  
WY9



## Response

~~The BLM has the authority to petition the Secretary of the Interior to withdraw federal mineral estate from entry under the 3809 regulations, whether the surface ownership is administered by the BLM or any other non-BLM entity per 43 CFR 2300.~~

For lands where the BLM administers the locatable mineral estate but not the overlying surface, except for those lands patented under the Stock Raising Homestead Act, operator must file a Plan of Operations or Notice for all proposed operations (43 CFR 3809.31(e)). The regulations at 43 CFR 3809 apply to those activities within lands being explored, mined, or used for placement of facilities that are reasonably incident to exploration, development, or mining. The regulations also apply to the access roads and facilities across split estate lands to and from the project area.

Where the mineral estate is private and the surface is administered by the BLM, the 3809 regulations do not apply because the non-Federal minerals are not subject to the 1872 Mining Law. The BLM is not proposing, under any alternative, to apply restrictions on this type of split-estate. Because the BLM still has an obligation under 43 USC 1732(b) to prevent unnecessary and undue degradation, the owner or operator must obtain a special use lease, permit, or easement under 43 CFR 2920 before using the public lands to develop the private mineral estate, and may be required to provide a financial guarantee before commencing surface-disturbing activities. The BLM will review each proposed authorization under the regulations at 43 CFR 2920 to ensure compliance with the unnecessary and undue degradation requirement as required by Section 302 of FLPMA (43 USC 1732(b)). The proponent is required to submit certain information concerning the proposed action (43 CFR 2920.2-4). This information requirement is similar to those required under 43 CFR 3809.301 and 3809.401. Appropriate NEPA analysis must be conducted on any special use lease, permit, or easement before it is granted.

~~The BLM has the authority to petition the Secretary of the Interior to withdraw federal mineral estate from entry under the 3809 regulations, whether the surface ownership is administered by the BLM or any other non-BLM entity per 43 CFR 2300.~~

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives.

The DEIS considered a broad range of alternatives that considers variations in PPMA and PGMA as well as different restrictions on locatable mineral development.

n/a

The FEIS will include a mitigation appendix, which will outline the mitigation process.  
For lands remaining open to mineral entry under the Mining Law of 1872 would be allowed.

If an area were to be withdrawn from mineral location, new activities such as filing mining claims and producing locatable minerals would be prohibited, subject to valid existing rights.

FEIS needs a definition of effective mitigation. This is not a locatable mineral-specific issue as the term is used throughout the DEIS under multiple program areas.

See Section 5.2 for FLPMA response, which includes rights of mining claims and claimants.

The summary of impacts in Table 2-8 under Alternative D for locatable minerals is consistent with the management actions in Table 2-5.

n/a

Section 1.5 of the DRMPA/DEIS describes how the Lewistown District Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the district office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the district office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

[Habitat objectives provided in the Management Plan and Conservation Strategies for Sage-Grouse in Montana Plan \(2005\) will be incorporated into Standards and guidelines for rangeland health under Alternatives B and D. Whether or not standards are being met will be determined prior to renewing grazing authorizations. A toolbox of permit conditions and conservation measures such as RDFs and BMPs \(Appendix C and D\) would be available to Managers to choose from when granting or renewing grazing authorizations, as applicable for each individual allotment within priority habitat.](#)

During the development of the Final EIS, the BLM met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and impacts analysis (see Sections XXX of the FEIS). [NOTE TO BLM: provide direction of how to respond if the alternatives for

n/a

There seems to be a disconnect between the issue statement and response. The issue statement seems to be about site specific or implementation level issues, while the response touches upon the range of alternatives. Review and update either issue or response.

This response seems to have been comment by comment. Please roll up in a single, coherent response.

appears to have a disconnect between the issue statement and the response. Blue text sounds like it should be moved to grazing. Don't actually see a response to the issue statement.

Plan	Issue Statement
OR	There are some inaccuracies regarding the locatable minerals being mined in the planning area and the potential for new exploration and development under the different alternatives. The Mormon Basin Mining Operation has been left out of the
UT	n/a
ID-SW	n/a
MT	
NV-CA	<del>This section should be split into two parts:</del> <ol style="list-style-type: none"> <li>1. The BLM fails to provide a thorough discussion of geology in the EIS.</li> <li>2. The DEIS incorrectly describes the potential effects on GRSG habitat from locatable mineral development by analyzing the full claim area where development could occur, which is likely to be a larger area than the area of actual approved disturbance caused from activities</li> </ol>
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

## Response

As required by NEPA, the baseline information used in the DEIS, including mineral material data, is based on the best available regional information and follows an agency accepted process. Mineral documentation is based on observed trends. GRSG is a landscape level species accompanied by a programmatic EIS for all of Eastern Oregon. Specific detail about any one mine is not appropriate in this planning effort. Additionally, documentation of minerals is based on observed trends. More specific locations, mining potentials, and claims will be carried out as part of a subsequent implementation-level mineral mining process.

n/a

n/a

National direction was to not develop a mineral potential report [follow up on justification for not preparing one and add language here], which limited the amount of baseline geology information available for the DEIS. Areas of actual mineral development are determined by mineral occurrence and economics..

The plan area boundary is the only feasible area to use for analysis of impacts due to mining.

n/a

n/a

n/a

Incomplete responses. Suggest numbering responses to correlate to issues.

Plan	Issue Statement
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OR	The BLM does not have authority to manage mining operations on private lands where the surface owner is also the owner of the mineral estate or on split-estate lands where the surface is private and the underlying mineral estate is in federal ownership and administered by the BLM (i.e., federal mineral estate). The BLM should disclose the estimated probability the proposed withdrawals will actually take place under the action alternatives.
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UT n/a

ID-SW  
MT The EIS fails to provide justification as to why “withdrawal from mineral entry” is necessary to protect GRSG and its habitat when the same objective can be achieved through avoidance, minimization of impacts, and mitigation of impacts within the designated areas. The current approach in the EIS does not meet FLPMA requirements for finding ways to remain flexible in balancing conservation and resource uses



NV-CA ~~This section needs to be split into 4 subsections:~~

1. The DEIS does not comply with general mining laws and other applicable agency policies related to mineral development, which allow for environmentally responsible mineral development with appropriate mitigation.
2. The DEIS does not address impacts from regulations limiting routes and ROWs, various restrictions placed on mineral activity, for each alternative, are not analyzed or compared, and additional analysis is needed to fully address the impacts of locatable minerals.
3. The DEIS should not close lands from mineral entry until after mineral development potential has been assessed.
4. The DEIS should require additional mitigation measures for locatable mineral development. (This sentence needs to be expanded to define what "additional mitigation measures" should be required.

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

As stated on Page 1-9 of the Draft RMPA/Draft EIS, “Although the entire planning area includes various land management entities, the management directions and actions outlined in this RMPA/EIS will apply only to BLM-administered surface lands in the planning area (Table 1-2) and BLM-administered federal mineral estate that may lie beneath other surface ownership, often referred to as split-estate lands. Table 1-4, BLM-Administered Mineral Split-Estate by RMP in the Planning Area, shows BLM-administered mineral split-estate beneath private, state, and other federally administered surface lands in the planning area. Because other federal and state surface land managers have management plans in place for their surface lands, the decisions resulting from this planning process will apply to only BLM-administered federal mineral split-estate beneath only private surface lands (2,639,000 acres in the planning area). The acreage of BLM-administered surface lands in the planning area and the acreage of BLM-administered federal mineral split-estate beneath private surface in the planning area are collectively referred to as the decision area.” In other words, the BLM is not proposing, under any alternative, to make decisions for private lands where the surface owner is also the owner of the mineral estate.

The BLM has the authority to petition the Secretary of the Interior to withdraw federal mineral estate from entry under the 3809 regulations, whether the surface ownership is administered by the BLM or any other non-BLM entity [need citation]. For lands where the BLM administers the locatable mineral estate but not the overlying surface, except for those lands patented under the Stock Raising Homestead Act, operator must file a Plan of Operations or Notice for all proposed operations (43 CFR 3809.31(e)). The regulations at 43 CFR 3809 apply to those activities within lands being explored, mined, or used for placement of facilities that are reasonably incident to exploration, development, or mining. The regulations also apply to the access roads and facilities across split estate lands to and from the project area.

Where the mineral estate is private and the surface is administered by the BLM, the 3809 regulations do not apply because the non-Federal minerals are not subject to the 1872 Mining Law. The BLM is not proposing, under any alternative, to apply restrictions on this type of split-estate. Because the BLM still has an obligation under 43 USC 1732(b) to prevent unnecessary and undue degradation, the owner or operator must obtain a special use lease, permit, or easement under 43 CFR 2920 before using the public lands to develop the private mineral estate, and may be required to provide a financial guarantee before commencing surface-disturbing activities. The BLM will review each proposed authorization under the regulations at 43 CFR 2920 to ensure compliance with the unnecessary and undue degradation requirement as required by Section 302 of FLPMA (43 USC 1732(b)). The proponent is required to submit certain information concerning the proposed

n/a

~~The facts that Sagebrush takes decades to re-establish and that disturbance from light and noise that accompany mineral development affect GRSG in a substantial way, meaning that avoidance, minimization of impacts and mitigation of impacts are not sufficient methods of protecting GRSG and sage brush habitat. Additionally, this concept was considered within the range of alternatives, as explained under Section 4.3, NEPA Range of Alternatives in this section. and Alternative D does not withdraw lands from mineral entry.~~ No change to the EIS has resulted from this comment. [NOTE TO BLM: Consider whether inserting text to this effect into the EIS is appropriate.]

The General Mining Law of 1872, as amended allows for access for environmentally responsible mineral development. There are standards in place that allow the BLM to regulate the nature of access and development. Impacts on locatable mineral development/access would vary and depend on site specific conditions. Projects would be analyzed on a case-by-case basis.

[Insert language from other issue regarding decision to not prepare a mineral potential report for this EIS]. Any recommendation submitted to Congress for mineral withdrawal must be accompanied by a mineral potential report covering the area proposed for withdrawal.

[See lands for language: mitigation measures will be included in the FEIS as an appendix]

[BLM: To address Comment 14-0188-40: review assumptions and insert citations where appropriate or needed.]

n/a

n/a

n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

This seems to be the same issue addressed in 17.1.

Consider combining these two sections.

Issue statement 3 is worded like an opinion and would be considered non-substantive.

Plan	Issue Statement
OR	The Mormon Basin Mining project has been left out of the past, present, and reasonably foreseeable future projects making up the cumulative effects scenario.
UT	The DLUPA/DEIS fails to adequately analyze the cumulative impact of locatable mineral withdrawals across the GRSG range.
ID-SW	The DLUPA/DEIS fails to adequately analyze the cumulative impact of locatable mineral withdrawals across the GRSG range.
MT	The DLUPA/DEIS fails to adequately analyze the cumulative impact of locatable mineral withdrawals across the GRSG range.
NV-CA	The BLM should clarify the total number of acres proposed for immediate and future withdrawal within the planning area and in Idaho, Montana, Oregon, and Utah and the cumulative impacts of those withdrawals across the subregions.

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

The Mormon Basin Mining project has been included in the plan of operations summary. Claims exist throughout the planning area. Mineral potential reports were not evaluated. Documentation is based on observed trends. The Mormon Basin Mining Operation is addressed in a project specific NEPA. [Note to BLM: The Mormon Basin Mining project should be added to the trends analysis.]

Additional information on the cumulative effect of withdrawals across GRS range has been added to Section 4.24.21 of the FEIS. [EMPSi ACTION ITEM FOR FEIS: add information. Tyler to provide roll-up of withdrawals from plans for incorporation into EIS]

Additional information on the cumulative effect of withdrawals across GRS range has been added to Section XXX (locatables cumulative effects section) of the EIS. [NOTE TO BLM: Could include roll-up of withdrawals from plans for incorporation into EIS]

The total number of acres proposed for withdrawal is included in each of the Great Basin sub-region DEISs [include location in the NV/CA document].

Technical edits will be reviewed and addressed as appropriate as part of the FEIS.

The DEIS has met the NEPA/CEQ requirements for cumulative impacts analysis in each of the respective sub-regional EISs.

n/a

n/a

n/a

Slight disconnect between issue statement and response. Make sure they match up.

Need a better explanation on how the DEIS has met requirements for cumulative impact analysis. May want to use language from national team



Plan	Issue Statement
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OR n/a

UT n/a

ID-SW n/a

MT

NV-CA The BLM needs to clarify the meaning of "effective mitigation".

NWCO n/a

Lewisto Commenters requested additional  
wn mitigation, including BMPs for locatable mineral development should be required, not recommended, to the extent possible (e.g., applied as RDFs) in compliance with RMPA GSG goals and objectives, and compensatory mitigation.

ND n/a

WY9

## Response

n/a

n/a

n/a

The FEIS will include a final mitigation plan as an appendix and will include a definition of effective mitigation.

n/a

Locatable minerals are minerals for which the right to explore or develop the mineral resource on federal land is established by the location (or staking) of mining claims and is authorized under the General Mining Law of 1872. The BLM can only apply mitigation measures to prevent unnecessary or undue degradation means conditions, activities, or practices that (43 CFR 3809.5): (1) Fail to comply with one or more of the following: the performance standards in Section 3809.420, the terms and conditions of an approved Plan of Operations, operations described in a complete notice, and other federal and state laws related to environmental protection and protection of cultural resources; (2) Are not “reasonably incident” to prospecting, mining, or processing operations as defined in Section 3715. 0-5 of this chapter; or (3) Fail to attain a stated level of protection or reclamation required by specific laws in areas such as the California Desert Conservation Area, Wild and Scenic Rivers, BLM-administered portions of the National Wilderness System, and BLM-administered National Monuments and National Conservation Areas.

A plan of operations is not a BLM plan; rather it is submitted by the applicant wanting to develop the minerals. Appendix C and Appendix D of the Lewistown Field Office Greater Sage-Grouse DRMPA/DEIS contains best management practices (BMPs) that could be applied to locatable minerals. The BMPs are designed to protect GRSG habitat. Before exploration licenses and licenses to mine are approved, a project-specific environmental review document would be prepared to assess impacts. BMPs would be applied as COAs or mitigation measures to the authorizing document as determined by site specific project level NEPA analysis as to prevent undue and unnecessary environmental degradation.

### **[Consider using this national language on mitigation:**

Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

n/a

Issue statement written as an opinion and would be considered non-substantive as is. Consider rewriting to remove "requested".



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	Garfield County has not been contacted regarding management of National Historic Trails.
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

The Draft Comprehensive Management Plan for the Old Spanish Trail is being prepared under a separate planning process and is not part of the Utah Greater Sage-Grouse LUPA/EIS planning process.

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	The Draft EIS contains conflicting impact analysis statements regarding the effects of closures and restrictions on dispersed camping and other recreational activities.
Lewisto	n/a
wn	
ND	n/a
WY9	

## Response

n/a

n/a

n/a

n/a

The conflict arose from a typographic error in the Draft EIS. The referenced section should note that it refers to Alternative C, not Alternative D as Alternative C is the most restrictive of the alternatives analyzed in the EIS. This error has been corrected in the Final EIS, see *Section XX*.

n/a

n/a



Plan	Issue Statement
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OR	The BLM should consider using seasonal and temporal closures and/or noise regulations to reduce impacts of recreation on sage-grouse. Furthermore, the BLM should address the issue of hunting of sage-grouse. Travel management plans should be prioritized for GRSG.
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UT	Commenters stated that various alternatives are inadequate to protect GRSG from the impacts of recreation (e.g., antler collection, camping, and OHV travel) and that more stringent measures should be put in place. Additional comments suggested changes to the noise restrictions included in the EIS as they affect recreational activities.
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ID-SW MT In the EIS/LUPA, the BLM/FS should incorporate additional management actions (e.g. SRP/SUP stipulations, OHV noise regulations, seasonal restrictions on OHV events near leks, and rerouting of OHV events away from leks, and hunting) to limit the potential for impacts on Sage-Grouse from recreation activities. Any management actions limiting recreation activities in sage-grouse habitat should be based on the best available science with proven habitat conservation results.

NV-CA The BLM should consider using seasonal and temporal closures and/or noise regulations to reduce impacts of recreation on sage-grouse.

NWCO n/a

Lewisto wn The BLM needs to consider additional actions or clarifications to existing actions within the range of alternatives, including expanding protections /buffers beyond GRSG habitat.

ND WY9 n/a

## Response

During subsequent implementation-level travel management planning, new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including speed.

Seasonal and temporal closures have been proposed in Oregon for this planning effort (see proposed plan). Seasonal closures will diminish noise near leks.

For the Greater Sage-Grouse planning effort, travel management plan prioritization has been addressed in the Final EIS and is addressed in section XX.

Oregon Department of Fish and Wildlife manages hunting; therefore, hunting is not addressed in this planning effort because it is outside the scope of the EIS.

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives.

The EIS considers an adequate range of alternatives to protect GRSG, including varying levels of restriction on recreational activities. The State of Utah regulates antler collection in the planning area, and the BLM does not allow cross-country motorized travel for collection of antlers in areas that are limited or closed to such travel. Under all action alternatives, GRSG habitat would be designated as at least limited to existing routes until route designation is completed. Noise restrictions in the EIS only apply to discretionary activities (e.g., SRPs for competitive events) and would not apply to

The EIS considers an adequate range of alternatives to protect GRSG, including varying levels of restriction on recreational activities and special recreation permits/special use permits. See recreation decision D-RC-1 and D-RC-3 in Table 2-18. During subsequent implementation-level travel management planning, new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including speed. New travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions during subsequent implementation level travel management planning. 43 CFR 8340 requires all OHVs to comply with state laws including noise and spark arrester requirements.

Contemporary hunting seasons in the Idaho and Southwest Montana Sub-region are very conservative with respect to their length and bag limits. The Idaho GRSG hunting season is determined annually according guidelines outlined in the 2006 Conservation Plan for the Greater Sage-grouse in Idaho (see table X below). Each year in August, IDFG evaluates population trends in 14 sage-grouse hunting zones and compares the data to the Conservation Plan guidelines. This information is then provided to the Commission. After considering population trend data, public input and local other issues, the commission, for each unit, either closes the season, or opens it at the restrictive level (7 day season with a 1 bird bag limit) or standard level (23 day season with 2 bird bag limit). This strategy allows for hunting opportunities in areas of healthy sage-grouse populations, while also closing areas to hunting where population numbers are low or have been impacted by large wildfires or other habitat issues. This past year, the sage-grouse hunting season was limited to seven days in 12 of the 14 hunting zones, with 2 zones being closed to hunting. Since implementing these guidelines, annual harvest has decreased significantly. In the past three years, harvest has averaged 2,900 sage-grouse per year, compared to 1985–1995 when an estimated 37,500 sage-grouse were harvested annually in Idaho.

In Montana, hunting seasons are... (Describe MT hunting season strategy).

In the past, sage-grouse harvest, like other upland game, was perceived to be a compensatory form of mortality (the proportion of the population that was harvested would have died from some other factor if hunting did not occur).

However, recent research has suggested that sage-grouse may be more susceptible to over-harvest than other upland game species because they have population characteristics that include relatively low reproductive rates, long lives, low annual turn-  
During subsequent implementation level travel management planning new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including noise levels and speed. Travel Management plans would not typically include noise levels.

The most recent and best available literature for establishing minimum noise level is research by Blickley (2012) and Patricelli (2012). Their research concluded that the current noise level restrictions applied by the BLM/FS for GRSG are already set too high and there are documented negative impacts to GRSG under these restrictions. The current noise restrictions are a minimal decibel level (dBA) of 10 over ambient noise levels which is equivalent to 39 dBA . The commenter (#0032-2) recommends a dBA of 96-101 based on the date that a vehicle was manufactured and is citing the CA State OHV Sound Law. This law was not established based on wildlife research or any minimum/maximum disturbance levels to wildlife. Based on research specific to noise impacts on GRSG, the BLM/FS will be applying maximum noise levels of less than 39 dBA (including ambient levels) on site-specific projects through Required Design Features and Best management Practices. These projects would undergo additional NEPA analysis at the project-level, which is outside the scope of this document. Need to see what the RDF states and revise based on new research. (Noise levels are likely to change based on Arlene's research.)

n/a



Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives.

Meaningful differences among the four alternatives are described in Table 2-3, Comparative Summary of Alternatives, in Section 2.10, Summary Comparison of Alternatives, of the Draft EIS. Specifically, impacts of Alternative B would be similar to Alternative D as both only allow neutral/beneficial SRPs on PH.

During the development of the Final EIS, the BLM met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

Use this as the national response for travel management planning and OHV related issues.

Plan	Issue Statement
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OR	The use level numbers and the expenditure data do not correspond to the commenter's knowledge of recreational use.
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UT	Commenters stated that the BLM and the Forest Service did not sufficiently incorporate local recreation plans into the EIS. Additionally, commenters were concerned that the BLM and Forest Service did not take appropriate baseline recreation opportunities into account in the EIS.
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ID-SW	n/a
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MT	
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NV-CA	The BLM should cite their sources which relate to OHV, recreational facilities, and hunting impacts to sage-grouse. The BLM should cite scientific literature related to the impacts of recreation on sage-grouse, including low impact recreation (such as hiking and camping)
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NWCO	n/a
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Lewisto	n/a
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wn	
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ND n/a  
WY9

## Response

In accordance with NEPA, the information presented in the DEIS is based upon the best scientific information available at the time the document was being written. [BLM: determine if additional references are needed to support the analysis as noted by the commenters].

The BLM uses the best data available based on the metrics they have developed.

Garfield County has not identified any specific instances in which this plan amendment conflicts with recreational decisions in local plans.

Section 3.16 of the DEIS recognizes that GRSG population areas overlapping Garfield County (i.e., Panguitch and Parker Mountain) contain a designated route network. Travel management plans completed for Kanab, Richfield, GSENM, and Dixie National Forest identified this network. The BLM and Forest Service are not proposing changes to this route network as part of this planning effort. Additional information has been added to Sections 3.16 and 4.16 of the FEIS discussing recreational opportunities in the Parker Mountain and Panguitch population areas. [EMPSi ACTION ITEM FOR FEIS: Add info on Bryce Canyon etc. Work with Dave Jessason at BLM]  
n/a

Cite general disturbance factors (human activity, predator perching) for recreation facilities .

NDOW cites Lyon and Anderson (2003) suggesting that light traffic disturbance (1-12 vehicles/day) during the breeding season might reduce nest-initiation rates and increase distances moved from leks during nest-site selection. NDOW also see acoustic impacts from machinery as a possible disruption in breeding activity (BSlickley and Patricelli 2012).

Additionally, recreation, including hiking, hunting and fishing, and OHV use in areas surrounding urban centers can negatively influence sage-grouse through habitat loss and fragmentation, facilitation of exotic plant spread, animal displacement or avoidance, establishment of population barriers, or increased human-wildlife encounters that increase wildlife mortality (Connelly and others, 2004). Recreation on lands managed by the BLM remains a significant land use with potential impacts to range conditions and sage-grouse populations (Connelly and others, 2004; also see Section III. A12. Other Land Uses). The cumulative nature of changes to the sagebrush biome as a result of human encroachment needs to be considered when managing sage-grouse. Mainer et al. 2013 pp 31.

Dispersed recreation activities (including but not limited to off-highway vehicles, camping, bicycling, and hunting), which utilize the extensive network of official and unofficial roads, have an extensive and difficult-to-measure impact on sagebrush and sage-grouse (also see Section III. A4. Infrastructure). Potential impacts include noise (Blickley and others, 2012), distribution of invasive plants, (With, 2004; Christen and Matlack, 2009; Bradley, 2010; Huebner, 2010), generation of fugitive dust (Gillies and others, 2005; Lee and others, 2007; Ouren and others, 2007; Padgett and others, 2008), and effects on predator and prey behavior (Gavin and Komers, 2006; Poulin and Villard, 2011; Whittington and others, 2011). Uninhabited areas within the Great Basin ecoregion (MZs III and V) decreased 90 percent (22.2 million acres [90,000 km<sup>2</sup>]) to less than 3 million acres (12,000 km<sup>2</sup>) with expansion driven by economic and recreation opportunities in the region (Knick and others, 2011); similarly, population densities have increased 19 percent in the Wyoming Basin region (MZ II) and 31 percent on the Colorado Plateau (MZ VII) since 1920 (Knick and others, 2011). With expanding populations comes greater human impacts (Leu and others, 2008), which is magnified by popular access to public lands (Hansen and others, 2005) and dispersed uses that expand the human footprint. Impacts of roads and motorized trails include mortality due to collisions, behavior modifications due to noise, activity and habitat loss, alteration of the physical environment, leaching of nutrients, erosion, spread of invasive plants, and increased use and noise due to accessibility (Knick and others, 2011). Closing unused and unnecessary roads in and around sagebrush habitats (for example, seasonal closure of specified sage-grouse habitats) may

n/a

n/a

n/a

Response should be "thank you for your comment", but all the rest of the information provided in the Response in black text needs to be included in the FEIS and deleted from the Response.

Direction to the FEIS team:  
Ensure that this information is incorporated into the FEIS.  
Modify the response to what is noted in the red text.

Plan	Issue Statement
OR	n/a
UT	The DLUPA/DEIS failed to adequately analyze the impacts of the alternatives on recreation.

ID-SW n/a  
MT



NV-CA The BLM should specify which permits will be allowed and include more than OHV race permits in impact analysis.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Recreation was not identified as a threat to GRSG in the USFWS 2010 listing determination. As such, very few decisions affecting recreation are being considered in the LUPA/EIS. Given that the BLM and Forest Service are considering few  
n/a

~~Consider additional criteria to what types of SRPs would be considered to negatively impact sage grouse such as any activity which could create additional ground disturbance—large group events, OHV racing... I don't agree with this response, the types of disturbances to GRSG from anthropogenic disturbances are already discussed in the DEIS. The types of SRPs that would or would not be approved requires additional site-specific/project level NEPA analysis and is outside the scope of this document. I believe OHV racing was stated as an example only? Need to look into.~~

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Recreation was not identified as a threat to GRSG in the USFWS 2010 listing determination. As such, very few decisions affecting recreation are being considered in the LUPA/EIS. Given that the BLM and Forest Service are considering few

n/a

n/a

n/a



Use the UT response instead  
which is the national response.

See added red text. Keep  
notation that permits are  
implementation level and not  
within the scope of this  
document.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	The BLM should address the issue of hunting of sage-grouse. The BLM should consider trailheads where existing roads are closed and converted to non-motorized trails.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

n/a

n/a

Contemporary hunting seasons in the Nevada and Northeastern California Sub-region are generally very conservative due to their length and bag limits. The Nevada GRSG hunting season is limited to 10-15 days with a bag limit of 2 birds daily and 4 birds in possession. While California allows a 2 day season and a bag limit of 2 birds per permit. Where GRSG populations are considered rather small and/or isolated, hunting seasons have been closed. Five counties in Nevada and over 20 hunt units have been closed to GRSG hunting since 1997. In California, two hunt zones were closed in 2012 and 2013 due to large wildfires within the Buffalo Skedaddle Population Management Unit. These units will likely remain closed to GRSG hunting in future years until significant habitat and population recovery occurs.

The biological issue remains whether or not hunting GRSG is additive, and contributes to population declines, or compensatory with other sources of mortality (e.g. predation). Research conducted on GRSG hunting indicates that local circumstances, such as overall population size and connectedness, habitat condition and proximity to urban areas may play an important role as to whether mortality is additive or compensatory. In a long-term study conducted in Eureka County, Nevada, Blomberg et al. (2013) found that human harvest accounted for 2 percent of all mortality and did not adversely impact GRSG populations.

There are ancillary benefits to GRSG hunting. Even though few hunters purchase a hunting license specifically for GRSG hunting, hunting license dollars are used to match federal grants (Pittman-Robertson Act) to conduct monitoring work annually, conduct research projects and implement habitat enhancement and restoration projects. Additionally, wings from hunter harvested GRSG are analyzed annually to determine nest success, recruitment and overall population viability. Cessation of hunting would likely eliminate the usage of hunting license dollars as a match for federal aid grants and greatly reduce annual monitoring efforts, research and habitat restoration projects that are currently funded through this mechanism. (NDOW 2014). (Review Comments to the Nevada and Northeastern California Sub-Area Sage-grouse LUPA/DEIS)

For the FEIS, the BLM has considered allowing/creating trailheads if roads are closed to motorized use and non-motorized use is allowed. Develop criteria for development of trailheads/parking areas. Limit disturbance to minimum necessary to accommodate typical use such as parking/unloading/turning horse trailers. Any structures (signs, fencing, etc.) not provide

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	Establish limitations on surface disturbance from mining operations consistent with overall disturbance caps in PGMA and connectivity habitat. Require habitat mitigation for all plans of operation and mining notices and put in place other mine plan requirements such as timing limitations as appropriate. Specify which mitigation practices could be applied to mine plans and notices. Closure of mineral material sites and lack of ability to open new mineral material sites.
UT	n/a
ID-SW	n/a
MT	
NV-CA	The BLM and Forest Service should implement site-specific criteria related to salable minerals. The BLM and Forest Service should add existing NDOT material sources to the state and federal road easements exemption language. Some management actions proposed by the BLM and Forest Service are infeasible or unsubstantiated.
NWCO	n/a

Lewisto wn Commenters requested clarifications in the FEIS, including defining “public interest” when referring to “where disposal is deemed to be in the public interest” and if RDFs will be required for existing salable mineral operations. Commenters also requested that PH/GH be considered as such "key wildlife areas" in the selected alternative.

ND n/a  
WY9



## Response

[Waiting for direction from the national policy team.]

Closure of PGMA was considered in this planning effort and PPMA has been changed to include allowance of mineral material sites with concurrence from Oregon Department of Fish and Wildlife. Saleable minerals are discretionary. Locatables require notices of plan of operations.

n/a

n/a

Salable minerals is a discretionary action and authorizing the sale of permits would be in conformance with the final LUPA/EIS and existing regulations.

Action D-SAL 2 provides for reclamation of sites no longer in use.

n/a

Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives.

Meaningful differences among the four alternatives are described in Table 2-3, Comparative Summary of Alternatives, in Section 2.10, Summary Comparison of Alternatives, of the Draft EIS.

During the development of the Final EIS, the BLM met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and impacts analysis (see Sections XXX of the FEIS). [NOTE TO BLM: provide direction of how to respond if the alternatives for saleable minerals were revised in the FEIS.]

As discussed in the DEIS (pp XX) Under Alternatives B, C, and D if an area is open to saleable minerals, mineral material sales or permits are analyzed on a case-by-case basis with site-specific NEPA. Based on this analysis, the field manager would issue sales or permits with RDFs or deny the proposal if impacts cannot be mitigated.

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR	The document is unclear on how rock quarries on private land would be affected. The closure of rock and fill sources on private and/or public lands could adversely affect the availability of the material and cost of maintaining roads.
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UT n/a

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

As stated on page 4-207 of the Draft RMPA/Draft EIS, "Management actions also apply to mineral material development on lands overlying federal mineral estate, which includes federal mineral estate underlying BLM-administered lands and lands not administered by the BLM." As such, operations on private land with federal mineral estate would be impacted in the same way as described in Section 4.13 of the Draft RMPA/Draft EIS. [Note to BLM: This section of the DEIS seems a little contradictory. The quoted statement is in the Assumptions section but on page 4-208, mineral split-estate is listed as a resource topic that wouldn't affect mineral materials. These two things seem to be at odds. Suggest checking Sections 4.11-4.14 to make sure the assumptions are accurate and are consistent with the list of resources that wouldn't affect the applicable topic.]

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
------	-----------------

- |    |   |
|----|---|
| OR | <p>Commentators recommend that the BLM Review the following data in the DEIS for accuracy and consider the recommended sources and data:</p> <p>typical impacts of BLM permit reduction at the ranch level</p> <ul style="list-style-type: none"><li>• mineral production employment estimates</li><li>• numbers for recreation/tourism employment</li><li>• Recreational visits</li><li>• Visitor spending by recreational visitors</li><li>• Income and Employment data and comparison areas</li><li>• Social and nonmarket values associated with ranching</li><li>• Environmental Justice</li></ul> |
|----|---|

In general, commenters stated that use of more specific, regional data would be more accurate.

Commenters question the use of data from 2010 stating that more recent data could be more accurate.

Commenters also question the accuracy of trends data from 2000-2010, stating that a

UT The DLUPA/DEIS fails to adequately describe the current socioeconomic conditions in the planning area. Economic data used in the analysis is from 2009, when communities were hard hit from the recession. Socioeconomic data in Chapter 4 is not consistent with data provided in Chapter 3. The DLUPA/DEIS fails to recognize the cultural values and uses of the land of the local population. Religious groups and the rural population may be considered minorities in comparison to national and statewide trends and the subjects of environmental justice. Analysis ignores other readily available data.

ID-SW n/a

MT

NV-CA BLM must revise the socioeconomic baseline analysis to include current economic data particularly related to livestock grazing, mining, tax revenues, and unemployment. Certain sectors and existing resources were inaccurately characterized including geothermal energy development in Churchill County, livestock grazing (generally and for Eureka Co and Modoc Co, specifically), and mining (Eureka Co and Elko Co). The relationship between billed and active AUMs is misleading – the BLM needs to better explain the factors that contribute to those differences. The discussion on interest groups and communities of place are confusing and hard to follow. BLM did not reference or evaluate several relevant existing studies (citations provided in comments). BLM did not disclose the

NWCO The BLM needs to use more current and site specific data, including new data from 2012 and analyze disadvantaged communities by place of residence, not just county of residence.

Lewisto n/a

wn

ND n/a

WY9



## Response

Before beginning the RMPA/EIS and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land-use plan level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects. The RMPA/EIS data and information is presented in map and table form and is sufficient to support the broad scale analyses required for land use planning.

As a result of these actions, the BLM and the Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/EIS, and provided an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives (Chapter 4). As a result, the BLM and the Forest Service have taken a “hard look,” as required by the NEPA, at the environmental consequences of the alternatives in the DLUPA/EIS to enable the decision maker to make an informed decision. Finally, the BLM has made a reasonable effort to collect and analyze all available data.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and the Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The BLM and the Forest Service will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan, which may include but are not limited to fuels treatment, habitat restoration, [etc.; list others as applicable]. The subsequent NEPA analyses for project-specific actions will tier to the land-use planning analysis and evaluate project impacts at the appropriate site-specific level (40 CFR 1502.20, 40 CFR 1508.28). As required by NEPA, the public will have the opportunity to participate in the NEPA process for site-specific actions.

Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined

The BLM and USFS used the best available data at the time of preparation of the DEIS. Most data are from 2010 and provide a snapshot of data at the time. The analysis of economic impacts of management alternatives through effects on the oil and gas industry is based on projected development over the 2014-2028 fifteen year period, not on the baseline data used. The baseline data serves as a reference for the relative magnitude of impacts and BLM and USFS do not expect the difference in impacts across alternatives to be meaningfully altered by updating the baseline. However, the BLM and USFS expanded and updated the baseline information for the FEIS, to the extent needed to support an expanded discussion of the geographic distribution of impacts and to avoid data that may not accurately reflect long term trends, due to the recession of 2008 and 2009.

The BLM and USFS followed CEQ guidance in the definition and identification of minority and low-income populations for the purpose of environmental justice analysis. However, in response to comments, the BLM and USFS expanded the discussion of cultural values and uses of public lands in the study area in the socioeconomics section, recognizing rural and religious characteristics of the population.

The BLM and Forest Service reviewed the suggested studies and references put forth by the commenters and incorporated to the extent that they presented new and high quality information that would need to be incorporated into the FEIS.

All agencies participating as cooperating agencies have been given opportunities to participate during various steps of the planning process, including regular briefings, requests for input on draft alternatives and the administrative draft EIS, and identification of issues and data during scoping and during the DEIS comment period, as required by 40 CFR 1503.2 and 40 CFR 1506.10. Based on the coordination efforts describe above, the BLM and Forest Service have met the legal and n/a

Next steps: ICF will, not limited to, complete the following: (1) Review comment summary and comment excerpts to ensure all issues have been sufficiently characterized. (2) Review the documents cited in the comments to determine if the information contained within conflicts with the current characterization of the social and economic conditions or if the information provides additional information that would alter the interpretation of impacts. ICF will revise the baseline to incorporate this information, if deemed appropriate. (3) ICF will review the data and characterization of the specific sectors that comments indicated were mischaracterized and make changes if needed. (4) ICF will add a discussion regarding factors that contribute to differences in billed and active AUMs [ICF will work with Josh Sidon and Mike Tietmeyer to develop language.]

Below is a partial and draft response for this theme and issues identified within:

BLM and USFS used the best available data at the time of elaboration of the DEIS. Most data are from 2010 and provide a snapshot of data at the time. BLM does not expect the difference in impacts across alternatives to be meaningfully altered by updating the baseline.

As noted previously in Section X.X, Best Available Information, the BLM and the Forest Service complied with CEQ 8 regulations in describing the affected environment. Of the suggested studies and references put forth by the commenters, the BLM reviewed them to determine if they presented new information that would need to be incorporated into the FEIS, were references already included in the draft EIS, or if the references provided the same information as already used or described in the Draft EIS. The BLM determined that...

BLM and USFS added information related to...[renewable energy in Churchill, mining in Eureka & Elko, livestock grazing...]

As noted previously in Section 4.4, Best Available Information, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment. BLM and USFS used the best available data at the time of elaboration of the DEIS. Most data are from 2010 and provide a snapshot of data at the time. BLM does not expect the difference in impacts across alternatives to be meaningfully altered by updating the baseline.

BLM and USFS described the affected area at a geographic level that would support the analysis of potential socioeconomic and environmental justice impacts. However, BLM and USFS edited Section 3.24 to recognize the potential presence of minority and low-income communities at the sub-county level. Potential disproportionately high and adverse human health and environmental effects on these communities from implementation actions would be analyzed during assessment of site specific projects.

*[NOTE TO BLM: Double check available data to determine if 2012 data is applicable. Restate methodology for establishing baseline sources and explain if current data will be used to the site estimates. Restate appropriate level of analysis (county level) due to*  
n/a

n/a



Plan	Issue Statement
OR	<p>Commenters state that the DEIS does not include sufficient analysis on the impacts of management actions related to livestock, and suggest that analysis of the following be included in the FEIS:</p> <ul style="list-style-type: none"><li>• Cost of replacement pasture</li><li>• Cost of transport of livestock to replacement pasture</li><li>• Downsizing of herds and subsequent loss in income</li><li>• Cost of changes to water developments</li><li>• Cost of drought management changes to grazing</li><li>• Cost in changes to seasons and timing of grazing</li><li>• Cost of changes to kind of livestock</li><li>• Impacts to property value of ranches resulting from changes to grazing permits</li><li>• Impacts to full and part time employees of ranches and the impacts to the community</li><li>• Context and intensity of the loss of ranching jobs in small rural communities</li><li>• Social aspects of loss of lifeways, traditions, skills with reduction/elimination of grazing</li><li>• Changes in cost for wildfire and invasive weed treatment as a result in changes to</li></ul>

UT 1/2 The DEIS analysis

underestimates/understates the economic hardships that restrictive management actions would impose on planning area operators, communities, and services. The BLM's analysis was overly generalized and did not provide county specific impacts. No effort is made to identify the size or intensity of impacts listed in the document. County land use plans were not considered in the analysis. The authors failed to recognize the cultural impacts associated with the alternatives (some counties have designated grazing as an activity of historic and cultural significance). The analysis is biased in favor of non-market valuation methods based on questionable methodology.

With respect to socioeconomic impacts of management alternatives through effects on specific resources:

- The EIS does not adequately analyze the impacts of management alternatives on recreation, lands and realty and travel management;
- The EIS does not adequately analyze the

UT 2/2

ID-SW MT The socioeconomic analysis in the DEIS is overallly broad and does not provide sufficient analysis of impacts to individuals, local communities or counties. The DEIS should also expand analysis of the restrictive management actions on planning area operators, communitis and services including but not limited to grazing operators and mining. Finally, the analysis methodology is inadequate to provide a comprehensive analysis of direct, indirect, and cumulative analysis of the socioeconomic impacts on the planning area communities.

NV-CA Initial Language:

1/2 The BLM fails to disclose/include/evaluate/identify/consider/quantify the socioeconomic impact(s) of/on/to: Alternative C, local government tax revenues due to reduced locatable mineral exploration and development, proposed wildland fire and fuels management, designation of ACECs under Alternatives C and F, locatable-mineral development and exploration, mineral withdrawals on Tribal lands, new project mitigation requirements, Alternative A on all resources, land withdrawals and restrictions on mining and recreation, the net economic effect on recreational activity (OHV, hunting), acres closed to Leasable Minerals Management and to Salable Minerals, OHV area designation changes in PPMAs/PGMAs, loss of livestock grazing, loss of future mineral extraction, loss of mineral/oil/gas exploration and renewable energy potential, recognize ancillary economic components (residential, commercial and industrial development), loss of quality of life features (education, recreation, housing), loss to the property



NWCO The DEIS analysis

underestimates/understates the economic hardships that restrictive management actions would impose on planning area operators, communities, and services. The DEIS also does not disclose the indirect impacts to communities and services which had been raised in scoping, such as the effects of more restrictions resulting in less support emergency services, thereby resulting in harm to life & property. Also, the BLM's analysis was overly generalized and did not provide county specific impacts. The analysis methodology is inadequate to provide a comprehensive analysis of direct, indirect, and cumulative analysis of the socioeconomic impacts on the planning area communities. Finally, the DEIS is biased in

Lewisto wn The final EIS should address the local, regional, and national socioeconomic effects related to wind energy in the cumulative effects analysis. Commenters requested a thorough economic calculation in the FEIS of the value lost from negative environmental impacts.

ND WY9 n/a

## Response

[NOTE: Waiting for ICF input before editing response.]

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

[BLM provide input on why county level analysis was not completed]

Impacts were considered on numerous resources, resource uses, and socioeconomic conditions, which included [list noted issues]. See Section 4.22 of the Draft EIS.

The DLUPA/EIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.22.2 of the Draft EIS). The methodology and assumptions provide an adequate starting point for discussion of the environmental

As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.22.2 and Appendix W of the Draft EIS). The methodology and assumptions provide a starting point for discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.24, the DLUPA/EIS identified methodologies used and made reference to the scientific and other sources relied upon for conclusions in the analysis. Based on these methodologies and assumptions, the DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Socioeconomic impacts assessed include impacts on output, employment, earnings and tax revenues in the affected area, non-market values, population and public services, specific groups and communities as well as environmental justice impacts. See Section 4.22 of the Draft EIS.

- A discussion of the potential socioeconomic impacts of management alternatives through mining of locatable and saleable minerals was included, as was a discussion of phosphate minerals;
- The oil and gas RFD was revised to recognize impacts of management alternatives on current leases;
- The discussion of potential impacts on wind energy was expanded;
- Information on the socioeconomic impact on school trust lands from making surrounding BLM and Forest Service-administered lands unavailable for various uses has been added;
- A discussion of the economic impacts of shifting development from Federal to private lands was added;
- A brief explanation of impacts on BLM administrative costs was included;
- The socioeconomic analysis was expanded to include a discussion of impacts cumulative with those of sage grouse habitat management alternatives being considered for other western states.
- BLM considers that several aspects commented on are appropriately addressed in the DEIS. In particular, the treatment of non-market values in this EIS is consistent with BLM guidance (see BLM IM 2013-131). Only those non-market values that

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

[BLM provide input on why county level analysis was not completed]

Impacts were considered on numerous resources, resource uses, and socioeconomic conditions, which included [list noted issues]. See Section 4.22 of the Draft EIS.

The DLUPA/EIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.22.2 of the Draft EIS). The methodology and assumptions provide an adequate starting point for discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.24, the

Next steps (general): ICF will review all comment excerpts to determine if the issues have been adequately summarized.

Scale (response – next steps): Consistent with the treatment of this comment in other subregions, ICF will investigate options and opportunities for disclosing information on impacts at a smaller geographic scale (county or place) for specific resource uses. If any of the impacts of specific resource uses, and the service centers that support them, are determined to be centralized in a subset of the planning area, ICF may run an additional IMPLAN analysis for the identified area.

Scale (draft/partial response): Although the discussion of impacts to counties and local communities was expanded to the extent possible, the distribution of estimated impacts to counties, cities and towns depends on the location of expenditures associated with economic activities. This location is often not known at the county, city or town level, based on the available data. In addition, In particular, because economic activity in one community or county typically has socioeconomic effects in other communities and counties with shared trade and commuter linkages, the impacts are often best assessed at the multi-county level.

ROW (response – next steps): Clarify with Dan Ryan the extent and nature of the proposed management action recommending burying “new and existing power lines” (including if it calls out transmission and/or distribution) and which alternative(s) it is proposed in. Consistent with the treatment of this comment in other subregions, ICF will add some information associated with potential realignment or burying of transmission/distribution lines. Information will likely include unit costs (i.e., per mile) of constructing (above ground) transmission/distribution lines in different terrains. ICF will seek out similar information for burying lines. The discussion will include how these costs are passed along to ratepayers. ICF will review the information in Leaming (2011) to determine if any information contained within is applicable to the impact analysis related to transmission lines.

Grazing (response – next steps): ICF will review comments and cited studies to determine if any information contained within contrasts with the methodology or conclusions of the econ impact analysis associated with grazing. If differences exist, ICF will determine if adjustments to the impact analysis should be made or provide rationale why it should not. ICF will add rationale why billed AUMs are the appropriate unit of analysis. ICF may need to coordinate with Josh Sidon and Mike Tietmeyer on any clarifying questions related to potential impacts to livestock grazing. ICF might explore options for expanding the discussion associated with impacts to interest groups by adding summaries or excerpts directly from comments associated with grazing.

Fiscal (response – next steps): ICF will identify options and opportunities to expand or clarify the section on “tax revenue and payments to states and counties.” In particular, an expanded discussion associated with potential impacts to tax revenues associated with locatable minerals (across alternatives) should be explored. A more substantive/meaningful discussion regarding how local tax revenues could be impacted should be explored.

EJ (response – next steps): Review comment. Initial evaluation by Sidon is that this issue was adequately addressed in the EJ impact section.

NMV (response – next steps): ICF will review cited literature to determine applicability and possible incorporation into the impact analysis associated with grazing.

Recreation (response – next steps): ICF will develop targeted and specific questions for the recreation/travel management specialists (Barbara Keleher and Leo Drumm) in order to clarify statements made in comments and to try to gain a better understanding (even at a qualitative level) of the potential impacts to recreation activity (especially OHV use) that might result in economic effects and how these impacts differ between alternatives. ICF will identify options and opportunities to expand or clarify the sections on economic impacts associated with minerals.

NOTE TO ICF: When developing formal responses please build off the suggested language and framework below. There are additional “national responses” – I’ll share that document with you.

The requisite level of information necessary to provide an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives is to provide the public and the decision maker with the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented (40 CFR 1502.16). The impact analysis provided in [Chapter XX] in the [name of particular amendment] was found to be insufficient to aid in determining whether to proceed with the preferred alternative or to make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1. While a land use planning-level action is broad in scope and, therefore, does not require site specific impact analysis, a thorough review of the EIS’s impact analysis relevant to [speak to the specific topic or theme of the issue statement, e.g.,

As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.24.2 of the Draft EIS). The methodology and assumptions provide an adequate starting point for discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.24, the DLUPA/EIS identified methodologies used and made reference to the scientific and other sources relied upon for conclusions in the analysis. Based on these methodologies and assumptions, the DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level

The DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Impacts were considered on numerous resources, resource uses, and socioeconomic conditions, which included grazing and recreation. See Sections 4.21 and 5.21 of the DRMPA/DEIS.

The DRMPA/DEIS describes the methodology and assumptions used for conducting the impact analysis (see Section 4.21.1 and 5.1.1 of the DRMPA/DEIS). The methodology and assumptions provide an adequate starting point for discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.24, the DRMPA/DEIS identified methodologies used and made reference to the scientific and other sources relied upon for conclusions in the analysis. Based on these methodologies and assumptions, the DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice

n/a





Plan	Issue Statement
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OR	<p>Commenters state that the BLM needs to consider cumulative impacts on changes to grazing level on both private and public lands as a result of proposed actions.</p> <p>Commenters also state that cumulative impacts on changes to jobs and employment may be underestimated since impacts are not additive and do not sufficiently recognize/incorporate the historical downward trends in the economy of Eastern Oregon, and BLM should review methods and data.</p>
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Commenters stated the cumulative effects on social conditions are understated and should be considered separately from and in addition to economic impacts.

UT	n/a
ID-SW	n/a
MT	

NV-CA Initial Language:  
The BLM fails to disclose/include/evaluate/identify/consider/quantify the socioeconomic impact(s) of/on: Alternative C, local government tax revenues due to reduced locatable mineral exploration and development, proposed wildland fire and fuels management, designation of ACECs under Alternatives C and F, locatable-mineral development and exploration, mineral withdrawals on Tribal lands, new project mitigation requirements, Alternative A on all resources, land withdrawals and restrictions on mining and recreation, the net economic effect on recreational activity (OHV, hunting), acres closed to Leasable Minerals Management, acres closed to Salable Minerals, OHV area designation changes in PPMA/PGMA, loss of livestock grazing, loss of recreation opportunities, loss of future mineral extraction, loss of mineral/oil/gas exploration and renewable energy potential, recognize ancillary economic components (residential, commercial and industrial development), loss of quality of life features (education,

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

[Waiting for input from ICF.]

AS discussed in the response for section 22.3, Cumulative analysis for the DEIS was at the appropriate scale for this planning level effort. [BLM review analysis to determine if additional info needed]

n/a

n/a

Next steps: ICF will need guidance from Joe and Randy on recommendations on how to adequately respond to the comment recommending a cumulative analysis that looks across the range.

BLM's ability to fund proposed management alternatives could also be considered under direct impacts. Again, ICF will need guidance from Joe and Randy on recommendations for addressing this comment.

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	The Draft EIS fails to consider the effects of livestock grazing in erosion calculations and plant community degradation.

Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

n/a

n/a

n/a

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	Commenters specifically request verification of the information and identification of any cropland within County boundaries.
ID-SW	One commentor notes that the DEIS lacks referenecs to support dicussion of macrobiotic crusts.
MT	
NV-CA	BLM and USFS should not use of stubble height requirements for management of riparian areas. Livestock grazing will be penalized by wild horse use of meadow and
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



## Response

n/a

*[NOTE TO BLM: Provide a response]*

[BLM/Forest Service- review soils section to determine if references needed to support disucssion]

For stubble height triggers to be implemented, a determination has been made that rangeland health standards for riparian areas have not been met and that livestock, rather than wild horses or some reason, is the causal factor. In terms of applicability of stubble height requirements to various site conditions, consideration is provided for "site capability and potential" (Table 2.7, Pg. 356). We recognize use of stubble height criteria is not appropriate for all sites.

n/a

n/a

n/a

Response should say either  
"data have been verified" or  
"data have been revised based  
on XX information"

Plan	Issue Statement
OR	Additional information pertaining to biological soil crusts was requested for Chapter 3. Also, commenters requested clarification of impacts on soil resources
UT	The DLUPA/DEIS failed to adequately analysis of the impacts of livestock on soils and soil processes.

ID-SW n/a  
MT  
NV-CA

NWCO n/a

Lewisto The DRMPA/DEIS does not adequately  
wn analyze the impacts of livestock on soils.

ND n/a  
WY9

## Response

Biological soil crust information will be added to Chapter 3. Impacts on soil resources from livestock will be clarified in Chapter 4.

The DLUPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

n/a

NOTE TO BLM: Review study and determine if the findings are essentially the same as you've already considered or if they provide new information that should be included in the EIS.

n/a

As noted in section 4.8 of this report, the DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1. Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation level actions. The site-specific analyses will tier to the plan level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

Chapter 4, Environmental Consequences, Section 4.16, Soil Resources, discusses the effects of livestock grazing on vegetation (ground cover) and the elevated potential for soil erosion. Also as, stated in Section 4.16 (Soil Resources, pp 4-134), achieving or maintaining Standards for Rangeland Health and Guidelines for Livestock Management generally is effective  
n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	BLM: Develop summary

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

n/a

n/a

CBD comment seems to be its own alternative rather than a substantive comment on the draft.

During subsequent implementation level travel management planning new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including noise levels and speed

n/a

n/a

n/a

If this is about alternatives for travel management actions, suggest moving it under 24.1.



Plan	Issue Statement
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OR	<p>Commenters expressed concern that proposed travel management actions in the DEIS would restrict administrative access to permitted activities such as livestock grazing and ROW development and inhibit the ongoing maintenance of existing infrastructure. Commenters noted that limitations on access should not override the need for timely and efficient responses to emergencies.</p>
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Commenters were divided between advocating for more or less travel restrictions. Some noted that BLM should not close or restrict any access or travel throughout the planning area, while others suggest that more routes should be closed through important habitat areas pending BLM's inventory and subsequent travel and transportation analysis. Commenters also requested more clarification or provided input as to the types of management that would (or should) apply once routes are designated.

Commenters also had concerns regarding

UT Commenters questioned how this LUPA/EIS would apply to the pending Cedar City FO RMP revision. Commenters were divided on what changes would need to be made to alternatives. Some commenters requested more restrictive measures be added to the FEIS to protect GRSG; while some commenters felt the management actions in the DLUPA/DEIS were too restrictive to travel opportunities. Commenters emphasized the need for the BLM and Forest Service to prioritize implementation-level travel management planning. They also questioned how this implementation-level planning would occur and expressed dissatisfaction with the BLM and Forest Service's approach for moving to a limited-to-designated route system from the current OHV area designations. Commenters also noted the importance of allowing administrative access for valid existing rights.

ID-SW The Draft EIS/LUPA failed to consider a full  
MT suite of travel management-related management actions that would protect sage grouse habitat while allowing for continued administrative access, particularly for existing livestock grazing permittees. Commenters proposed that management actions should be included in the proposed plan to prohibit and reclaim/restore roads in GRSG habitat, limit motorized events, close PPHP to OHV use, apply additional seasonal travel restrictions, and apply a maximum route density within proximity of leks in PPH and PGH. Commenters also requested that proposed management actions preserve motorized access on existing routes per the 3-State OHV and National Route Designation decisions and maintain administrative access in grazing allotments.

NV-CA Commenters were divided between additional restrictions on route access, noting that BLM should not close or restrict any access or travel through areas, and suggesting that more routes should be closed through important habitat areas pending BLM's inventory and subsequent travel and transportation analysis.

Commenters also had concerns regarding management actions that would limit new road construction or hinder the ability to maintain existing routes because of the potential of upgrading the route from one category to another.

Commenters concern regarding access for permitted activities, maintenance of infrastructure, public health and safety.

NWCO The Draft EIS failed to provide changes to unrestricted motorized travel or open motorized routes to protect sage grouse which does not comply with the BLM's open road minimization requirements of the regulations. Also, BLM needs to consider additional measures under the alternatives.

Lewisto wn Commenters requested the FEIS clarify that ranching activities are amongst the authorized off-road uses. Commenters also recommended that a timeframe for travel management planning completion under Alternative D be specified and compensatory mitigation be included in Alternative D.

The BLM needs to consider additional actions or clarifications to existing actions within the range of alternatives, including:

- administrative off-road use being no less than 3% of total disturbance
- periodically evaluating the level of disturbance to PH from off-road use
- road density limitations
- specific road placement guidelines
- Limiting motorized travel to existing roads, primitive roads, and trails until travel management can be completed in PH, GH

ND The BLM should consider restricting new road construction to a minimum of 0.8 mile from leks, nesting habitat, and concentration areas in the alternatives. The BLM should also consider using jeep trails as for access and seasonal closures in nesting habitat and winter concentration areas.

WY9

## Response

### Permitted Uses:

The proposed LUPA would continue to allow access to valid existing rights within the planning area. Upon renewal of a livestock grazing permit, ROW authorization, or similar permitted use, the BLM would work with the permittee/ROW holder to adjust the appropriate level of access based on documented effects of that access on GRSG. [BLM: Consider adding language to include clarification regarding administrative access and the exceptions to OHV regulations found in 43 CFR 8340.0-5. Exceptions include: Any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; and any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved.] Under SRP guidelines in the DEIS, as well as BLM regulation SRPs are discretionary with decisions made at the local line officer.

In terms of area closures, see alternatives considered but eliminated in the draft.

### Travel restrictions:

During subsequent implementation-level travel management planning, new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road restrictions or road additions, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including speed. In accordance with NEPA, subsequent travel management planning will include public involvement. In the proposed plan, all OHV allocations have been limited in PGMA. In addition, this is a planning document intended to conserve sage grouse and sage grouse habitat.

As noted on page I-6 of the DRMPA/DEIS, the purpose of the national GRSG planning effort is limited to making land use planning decisions specific to the conservation, enhancement, and/or restoration of GRSG habitat specifically by reducing, eliminating, or minimizing the threats to that habitat. No decisions related to the management of Wilderness, WSAs, or lands with wilderness characteristics will be made as part of this planning effort; therefore, management of Wilderness, WSAs, and lands with wilderness characteristics is considered outside the scope of this plan amendment process. Impacts on lands with wilderness characteristics from the alternatives being analyzed in this planning effort are presented in Chapter 4, Section 4.18, Lands with Wilderness Characteristics.

[BLM: Consider incorporating additional language to emphasize that the route selection process will be completed as subsequent implementation level planning using current TM policies and will include public and local agency involvement.]

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

The GRSG management decisions being considered in this EIS will be incorporated into the Cedar City FO RMP revision. Cedar City's implementation-level travel management plans will be consistent with guidance included in the LUPs.

BLM has complied with its travel and transportation policy in identifying areas that are open, limited, and closed to motorized vehicle travel. All areas currently identified as open in GRSG habitat would be changed to limited to existing routes until route designations are complete. The BLM and Forest Service has established priorities for completing travel plans in GRSG habitat based on the amount of motorized vehicle use and the value of the habitat. The BLM and Forest Service have added decisions to the FEIS explaining the process that will be used in moving from a limited to existing routes category to a limited to designated routes category. The BLM has also added a decision that provides guidance to be taken into consideration when completing route designations. Finally, a preliminary route network has been identified and a map has been included in the FEIS showing known "existing" routes in areas that were previously open to cross-country travel. Decisions on seasonal closures, route purpose, and avoiding harassment and disruption of wildlife and their habitat will be addressed during the implementation-level travel planning process. Addressing these issues at the implementation level allows the BLM and Forest Service to take new information into account as it becomes available. [BLM ACTION ITEM FOR FEIS: Ensure that all these things have been added to the EIS.]

Section 1.4 of the Draft EIS describes how the Idaho Montana GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions. During subsequent implementation-level travel management planning new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including noise levels and speed. The route designation process will be completed as subsequent implementation level planning using current Travel Management policies and will include public and local agency involvement. Addressing these issues at the implementation level allows the BLM and Forest Service to take new information into account as it becomes available.

Needs for administrative access to valid existing rights, grandfathered uses, or permitted activities would taken into consideration during site-specific NEPA analysis. Restrictions applied to recreational OHV use may not apply to permitted administrative uses.

The BLM and Forest Service have not added a restriction that would limit road densities to less than 0.09 km per km squared (Wisdom et al. 2011) in GRSG habitat because the threshold established by Wisdom used coarse road data. When

#### Route selection:

During subsequent implementation level travel management planning new travel management plans would evaluate vehicle routes and determine the need for permanent or seasonal road closures, and mode of travel (e.g. motorcycle, ATV, and UTV) restrictions, including noise levels and speed. Implementation level travel management planning will include public involvement.

Consider additional language to emphasize that the route selection process will be completed as subsequent implementation level planning using current TM policies and will include public and local agency involvement.

#### New Road construction:

New road construction is addressed in Action D-LR-W 4: New ROW authorizations would be evaluated on a case-by-case basis. If new road construction is necessary, minimize impacts on GRS habitat through application of RDFs and other mitigation measures.

Temporary routes would be addressed during implementation level project evaluation. Temporary routes are generally not constructed during vegetation treatments.

#### Route Maintenance:

Routine maintenance of a primitive road would not upgrade the classification to a road.

Consider including the definition of Road, Primitive Road and Trail in DEIS.

Roads are linear routes managed for use by low clearance vehicles having four or more wheels, and are maintained for regular and continuous use.

Primitive Roads are linear routes managed for use by four-wheel drive or high-clearance vehicles. They do not normally meet any design standards.

Trails are linear routes managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

As discussed previously under Sections 4.3 and 7.5 of this report, the BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and FS regulations, policy and guidance.

During the development of the Final EIS, the BLM and FS met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and impacts analysis (see *Sections XXX of the FEIS*).

There are several management actions in the DEIS that do aim to minimize road construction and also would make open OHV areas in PPH limited to existing routes.

Under the NTT Action No. 1 Alternatives B, C and D all identify to limit motorized travel: "(PPH) Limit motorized travel to existing roads, primitive roads, and trails at a minimum." whereas Alternative A is the No Action/Current Management. Chapter 4, Environmental Consequences, Impacts from Travel Management on Travel Management (page 681) identifies that Alternatives B, C and D would change 574,100 acres from Open to Limited in PPH. Areas in PPH would become Limited in Alternatives B, C and D, and would not be open to unrestricted cross country motorized travel.

NTT Action No.3 identifies "(PPH) Complete activity level travel plans within 5 years of the ROD.....". Alternative A (Table 2.3 - page 52) identifies that Travel Management Route designation is being completed as a part of the RMP revision process for CRVFO, GJFO, and KFO. The LSFO RMP requires per Colorado State BLM policy that all areas in Limited Travel Management areas have completed Transportation Plans within 5 years of the RMP ROD. The Roan Plateau RMP identifies

As discussed previously under Sections 4.3 of this report, the BLM complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM regulations, policy and guidance.

During the development of the Final EIS, the BLM met with the USFWS to determine changes to the management actions and mitigation measures. The outcome from these meetings resulted in noted clarifications and edits to the alternatives and impacts analysis (see Sections XXX of the FEIS).

It should be noted that restrictions in place for travel have exclusions for administrative purposes; for example, cross-country OHV travel is prohibited and must remain on existing travel routes except for administrative purposes (see sections 1.8.7 ,Off-Highway Vehicle Record of Decision and Proposed Plan Amendment for Montana, North Dakota, and Portions of South Dakota, and 3.11.1 Comprehensive Travel And Transportation Management- Current Conditions)

[NOTE TO BLM: consider if timing stipulations of off-road uses for ranching activities would be needed. May need to update FEIS to clarify definition of administrative purposes and any exceptions for TM activities in the proposed plan]

[NOTE TO BLM: include a brief description of the changes and rationale for making the changes. This section of the response will need to be coordinated with the National group and may need to be reviewed higher up the chain.]

As discussed previously under Section 4.3 of this report, the BLM complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM regulations, policy and guidance.

The management actions in the DRMPA/DEIS (see Table 2-3) ~~fall within the provide an adequate~~ range of alternatives for protecting GRSG related to travel management, including travel limitations, seasonal closures, travel planning, valid existing rights, road maintenance, and road construction (e.g., Alternative C has a 4-mile buffer around leks to determine road route; Alternatives B and D 'limit route construction to realignments of existing designated routes if that realignment has a minimal impact on GRSG habitat, eliminates the need to construct a new road, or is necessary for motorist safety; and Alternative D allows new routes/realignments in PH and GH during site-specific travel planning if it improves GRSG habitat and resource conditions). In addition, the management actions (page 2-25) of the DRMPA/DEIS include evaluating the need for permanent



NCT Notes

Regional Team NOTES, EDITS, COMMENTS

See UT's response. Is more specific to the NEPA elements that needed to be considered in the range of alternatives for travel management criteria. Consider adding information from UT response into the OR response.



See UT's response. Is more specific to the NEPA elements that needed to be considered in the range of alternatives for travel management criteria. Consider adding information from UT response into the NV-CA response.

See UT's response. Consider adding information from UT response related to connection between range of alts and the travel management criteria into the NWCO response.

See UT's response. Consider adding information from UT response related to connection between range of alts and the travel management criteria into the Lewistown response.

See UT's response. Consider adding information from UT response related to connection between range of alts and the travel management criteria into the ND response.

Plan	Issue Statement
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OR	Commenters asserted that the baseline route information used as a basis for analysis in the DEIS is not accurate or not complete and the process used to develop the inventory is based on false assumptions. Further, most routes predate the establishment of the BLM and should therefore be managed under the jurisdiction of the counties.
UT	Commenters requested that the FEIS take existing travel management plans and route networks into consideration.

ID-SW MT	Chapter 3 of the Draft EIS/LUPA does not depict the number of acres designated as open to cross-country motorized travel.
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NV-CA	The BLM needs to include an update to Chapter 3 that indicates which field offices have current TMPs. Commenters suggested additional studies to be included in the DEIS, such as Lyon & Anderson 2003 and Slickley & Parricelli 2012.
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NWCO	n/a
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Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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## Response

As required by NEPA, the baseline information used in the DEIS, including GIS-based route inventory data, is based on the best available regional information and follows an agency-accepted process. More specific route inventories and the designation of travel management for those routes will be carried out as part of a subsequent implementation-level travel management process, during which additional data, including ground-truthed inventories, will be gathered to further analyze future route designations. Additionally, the EIS includes a range of alternatives considering seasonal restrictions on roads within discrete areas. Action B-TM 3: In PPMA, travel management should evaluate the need for permanent or seasonal road or area closures.

[Note to BLM; Baker County should be included in Table 3-33]

Table 3-33 has been revised to include Baker County.

The BLM has considered information from completed BLM and Forest Service travel management plans in the planning area. With the exception of Alternative C, the BLM and Forest Service are not proposing any changes to those existing plans as part of this planning process. Under Alternative C, the BLM and Forest Service have identified potential closed areas. Within these areas, some existing or designated routes could be affected. Consistency with local plans is addressed in Section 1.7 of the DEIS.

[NOTE TO BLM: Add current CTTM area designation acres to Chapter 3.]

Consider additional language in Ch 3 (Sec 3.10 – Current Condition) to include the Northern California BLM Offices to the lands with current travel planning.

NDOW traffic and acoustic impact comments are from studies related to oil and gas exploration. These impacts would be considered during implementation level travel planning.

n/a

n/a

n/a

State what your "agency-accepted process" is.

Reference back to NEPA 4.4 section response regarding NEPA requirements for the best available information and relevant information on which to base decisions.

Reference back to NEPA 4.4 section response regarding NEPA requirements for the best available information and relevant information on which to base decisions.

Reference back to NEPA 4.4 section response regarding NEPA requirements for the best available information and relevant information on which to base decisions.

Plan	Issue Statement
OR	Commenters questioned the scientific accuracy and references supporting the impact analysis and requested additional site-specific studies to support the analysis in the DEIS.
UT	n/a
ID-SW	For various reasons, commenters assert that
MT	<p>the Draft EIS/LUPA does not adequately analyze the impacts of proposed management actions on travel management. For example, commenters contend that the analysis is not based on sound science or is narrowly focused and biasedly uses studies that only demonstrate the negative effects from OHV use; does not adequately describe the magnitude of OHV vs. “naturally occurring” impacts across alternatives; and does not distinguish between motorized and non-motorized impacts. Commenters further request the BLM/FS consider conducting site-specific studies to support proposed management and assert that there would be indirect effects (e.g. ban on new road construction) incurred by existing ROW authorization</p>
NV-CA	<p>Commenters questioned the scientific accuracy and references that support much of the impact analysis provided on travel management, include specific requests to provide the studies that support analysis statements.</p>



NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

~~In accordance with NEPA, the impact analysis in the EIS is based on the best available information at the time of writing. Due to the large areas covered by the LUPA, scientific information and the nature and type of impacts is extrapolated for the entire planning area. Site specific studies will be conducted as part of subsequent implementation level project evaluation.~~

n/a

The mechanism being used to determine landscape level travel area designations (open/limited/closed) is 43 CFR 8340 which regulates OHV travel on public lands. BLM does not have a similar regulation for non-motorized travel. Non-motorized travel can be regulated through supplementary rules. Supplemental rules and site specific route designations will be addressed at the implementation level in the future.

New construction related to power line access would be exempted under 43 CFR 8340.05 (3).

While multiple studies on OHV use have been cited, BLM is using the BLM Travel Management Manual and Handbook (M-1626 & H-83421) to address travel planning in the EIS and will continue to use the same policy for future implementation and planning.

Cite general disturbance factors (human activity, predator perching) for recreation facilities.

NDOW cites Lyon and Anderson (2003) suggesting that light traffic disturbance (1-12 vehicles/day) during the breeding season might reduce nest-initiation rates and increase distances moved from leks during nest-site selection. NDOW also see acoustic impacts from machinery as a possible disruption in breeding activity (Slickley and Patricelli 2012). While these studies were conducted in oil and gas development areas, it is reasonable to assume that similar disturbance would have a similar impact.

The analysis is based on the no action alternative and the existing conditions. While future plans may restrict cross-country travel, "open to cross country travel" is the current condition. Table 4.9 correctly shows the differences between

n/a

n/a

n/a

Reference back to NEPA 4.6 section response regarding NEPA requirements for adequacy of impact analysis and relevant information on which to base decisions.

Revise response to note requirements from section 4.6 NEPA impact analysis, and notation for appropriate scale of analysis for planning level decision making (e.g. site specific analysis done at a later date). If comments are actually looking for references/info that relate to OR specifically (rather than a study done

Reference back to NEPA 4.6 section response regarding NEPA requirements for adequacy of impact analysis and relevant information on which to base decisions.

Include statement about appropriate scale of analysis for planning level decision making (e.g. site specific/implementation analysis done at a later date). If comments are actually looking for references/info that relate to ID/MT specifically (rather than a study done in another state), then note why the study is still relevant and applicable to ID.

Reference back to NEPA 4.6 section response regarding NEPA requirements for adequacy of impact analysis and relevant information on which to base decisions.

If comments are actually looking for references/info that relate to NV-CA specifically (rather than a study done in another state), then note why the study

Plan	Issue Statement
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OR	The BLM should adopt the invasive species related prevention/education program found at <a href="http://playcleango.org/">http://playcleango.org/</a>
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UT	The DLUPA/DEIS fails to adequately define uses that would be restricted under the alternatives.
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ID-SW	n/a
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MT	
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NV-CA	n/a
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NWCO	n/a
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Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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Response

[BLM: Determine the validity in adopting elements of the playcleango.org program]

A definition of OHV is included in the EIS Glossary.

n/a

n/a

n/a

n/a

n/a

## NCT Notes

This issue statement is the same as NV & ID had, but they listed it under 24.5. Clarify, is this issue statement actually about mitigation or is there a ties in to cumulative impact analysis?

Suggest clarifying issue statement to more clearly understand the relationship with cumulative impacts analysis.

As noted in NV & ID:

1. BLM reviewed the measures provided by commenters on playcleango.org
2. they were found to be the same as (similar as?) those already provided in Appendix XX.
3. Review of the impact analysis confirmed that the outcomes from the suggested mitigation measures would be the same as those described in the EIS (see section XX).
4. Conclusion. If determine that it is valid to adopt elements of the program, note that they were included in BMPs/RDFs and

Based on response, sounds like the commenter is asking for clarification/definition of the OHV uses that would be restricted in the alternatives. If this is the case, suggest clarifying issue statement to say, "...fails to adequately define **OHV uses** that





Plan	Issue Statement
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OR	The DEIS does not include additional definition of ratios of mitigation, who is responsible for mitigation, and how the mitigation will be carried out.
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UT	n/a
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ID-SW MT	The LUPA/EIS should adopt additional travel-related mitigation measures to educate the public and prevent the spread of invasive species from travel-related sources through mitigation measures such as those described at <a href="http://playcleango.org">playcleango.org</a> .
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NV-CA	The BLM should adopt the invasive species related prevention/education program found at <a href="http://playcleango.org/">http://playcleango.org/</a>
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NWCO	Further explanation is needed to clarify how to measure for adverse effects on sage grouse.
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Lewisto wn	n/a
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ND n/a  
WY9

## Response

Because the LUPA is a planning level document, it provides a mitigation framework but does not include a specific step-by-step mitigation implementation strategy. This strategy will be developed through a subsequent implementation-level process and will be consistent with the overarching framework contained in the land use plan.

n/a

Appendix C of the DEIS/LUPA includes required design features and best management practices, including those that are based on the best available science to prevent the spread and effects of non-native plant species. See RDF # 290.

[No response provided]

[NOTE TO BLM: this may be simple editorial clarification, or need more. If it truly relates to the mitigation/monitoring strategy, then can use this response:]

Mitigation, adaptive management and a monitoring framework were developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013).

[Refer to the Monitoring Framework in the appendix.] To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife

n/a

n/a

Include new information provided in the Mitigation and Monitoring response tabs. Include reference back to NEPA mitigation requirements response section 4.9 regarding requirements based in NEPA regs for mitigation measures and

ID and NV should use the same response as it is the same issue statement.

1. BLM reviewed the measures provided by commenters on playcleango.org
2. they were found to be the same as (similar as?) those already provided in Appendix XX.
3. Review of the impact analysis confirmed that the outcomes from the suggested mitigation measures would be the same as those described in the EIS (see section XX).

4. Conclusion (e.g., no changes needed)  
ID and NV should use the same response as it is the same issue statement.

1. BLM reviewed the measures provided by commenters on playcleango.org
2. they were found to be the same as (similar as?) those already provided in Appendix XX.
3. Review of the impact analysis confirmed that the outcomes from the suggested mitigation measures would be the same as those described in the EIS (see section XX).

4. Conclusion (e.g., no changes needed)

Plan	Issue Statement
OR	n/a
UT	The DEIS fails to address populations of GRSG on tribal lands throughout the West and how these populations could impact anticipated USFWS action under the ESA.

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

As stated in Section 1.3.1, the planning area for the Utah Greater Sage-Grouse LUPA/EIS is the geographic area within which the BLM and Forest Service will make decisions during this planning effort. The planning area boundary includes all lands regardless of jurisdiction; however, the BLM and Forest Service only make decisions on lands that fall under their respective jurisdiction. Tribal surface estate with Tribal mineral estate is not considered part of the decision area. However, the cumulative effects analysis for all topics in the DLUPA/DEIS included an analysis of cumulative effects at the planning area level, including past, present, and reasonably foreseeable future actions on tribal lands. The BLM and the Forest Service have complied fully with the requirements of 40 CFR 1508.7 and prepared a cumulative impact analysis to the extent possible based on the broad nature and scope of the proposed management options under consideration at the land use planning

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	The Fort McDermitt Paiute and Shoshone Tribe requests meaningful consultation during this process.
UT	Commenters requested the BLM and Forest Service consider updating consultation with Indian Tribes in the FEIS to include: Executive Order 13175 Consultation and Coordination With Indian Tribal Governments, Executive Order 13007 Indian Sacred Sites, and the Department of the Interior Policy on Consultation with Indian
ID-SW	The BLM should consider additional areas
MT	for ACEC designation and should consult with the Shoshone-Bannock Tribes about these designations.
NV-CA	BLM did not provide sufficient opportunities for tribes to consult or cooperate. BLM did not respond to submitted tribe comments from June 25, 2013.

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

[Note to BLM: Provide response.]

[NOTE TO BLM: provide direction if these EOs are to be added to Chapter 3 and Chapter 5 where tribal consultation is discussed.]

The BLM and Forest Service recognize their responsibility to ensure that meaningful consultation and coordination concerning GRSG planning is conducted with federally recognized tribes, including the Shoshone-Bannock Tribes, to consider tribal treaty rights and trust resources. [BLM-FS-include relevant legal citations. Note consultation efforts to date]

BLM provided tribes the opportunity to comment and participate in the development of the EIS through government-to-government consultation and as a cooperating agency. These efforts were detailed in Table 3-87 in the Draft EIS. Tribal concerns were specifically listed in Chapter 3 of the DEIS (pp. 3-241 and 3-242), to be brought forward in the analysis detailed in Chapter 4. For example, the Summit Lake Paiute Tribe noted that access to sage grouse strutting grounds during lekking in order to observe behaviors was critical to continuing tribal traditional practices. The DEIS, therefore, noted that those alternatives that would result in reductions of sage grouse numbers could decrease tribal opportunities to observe lekking behavior, and, conversely, those alternatives that would result in maintaining or increasing sage grouse numbers would either maintain or increase tribal opportunities to observe lekking behavior. These discussions were completed for each of the alternatives analyzed in the DEIS (see pages 4-278 to 4-287). In addition, the Wildlife Section of the FEIS contains a specific statement that the ROD does not preclude tribal observations of lekking behavior. Tribes that hold grazing permits were concerned that reductions in AUM's could harm tribes economically. Chapter 4 then noted that no reductions in AUM's were anticipated under alternatives A, B, D, E, and F, and thus no economic harm to tribes would be anticipated. Chapter 4 also noted that it was only under alternative C that AUM's may be reduced, thereby potentially causing economic harm to tribes that hold grazing permits (p. 4-281). All of these discussions have been retained in the FEIS.

n/a

n/a

n/a



Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO	n/a
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Lewistow	n/a
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ND	n/a
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WY9

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
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OR	Tribes are concerned that climate change, fire, and drought have not been addressed in the EIS and sage grouse have important spiritual and cultural values.
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UT	n/a
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ID-SW	The BLM must ensure tribes, in particular the Shoshone-Bannock Tribe, maintain opportunities to access the public domain, exercise off-reservation treaty rights, and continue their traditional customs and practices.
MT	

NV-CA	The Draft LUPA/EIS fails to identify, consider, and evaluate the economic development, jobs, and taxes that support local services for the tribe, and how these interests might be impacted. Additionally, the DEIS should recognize tribal transportation plans and projects approved prior to the DEIS.
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NWCO	n/a
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Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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## Response

The BLM has revised chapter 3 to state that Fort McDermitt Paiute and Shoshone Tribe of Nevada and Oregon and Burns Paiute have identified sage grouse as important to their culture. Management decisions related to fire, climate change, and drought are discussed in chapter 2. Land management on Tribal Reservations is not within the scope of the project. See Purpose and Need.

n/a

The BLM, Forest Service recognize their responsibility to consider potential impacts to Tribal resources.

Article 4 of the Fort Bridger Treaty, signed in 1868, retains the Eastern Band Shoshone and Bannock Tribes' rights to hunt, fish, gather natural resources, and provide other associative right necessary to effectuate these rights. Other treaties ensure similar rights for other tribes.

The BLM will analyze the impacts of the planning decisions in the FEIS on tribal interests [Note to BLM- is this analysis sufficient in the DEIS?]

The BLM would not require the ROW grant holder to retro-fit existing power lines until the ROW grant is up for renewal. BLM ROWs are issued on a term basis (10/20/30 year terms etc.). Once the term is up the BLM may renew the ROW and determine additional terms and conditions based on current policies and guidance. (43 CFR 2807)

Withdrawals of federal lands are authorized pursuant to FLPMA and are processed through an application process. Terms established for legislative withdrawals are made at the discretion of Congress.

New road construction is addressed in Action D-LR-W 4: New ROW authorizations would be evaluated on a case-by-case basis. If new road construction is necessary, approval would minimize impacts on GRS habitat through application of RFDs and other mitigation measures.

The DEIS stated (p. 4-275) that many of the "effects on tribal interests are general and unquantifiable in nature." These types of impacts were analyzed in Section 4.21.3, where it was noted, for example, that future fluid mineral leasing within PPH/PGH habitats could reduce sage grouse numbers and impact tribal observations of lekking behavior. Nevertheless, the alternatives analyzed in the DEIS were of various levels of complexity. Some alternatives, such as alternative A, were silent on a number of critical issues, and therefore the impacts of this alternative on tribal interests remains unknown for those issues. In contrast, the preferred alternative, alternative D, was not silent on a single critical issue analyzed in the DEIS, and therefore the preferred alternative contained the full suite of analysis on tribal interests. In addition, the Environmental Justice section of the DEIS specifically details the potential economic impact of each alternative on tribal grazing interests.

n/a

n/a

n/a

The response sounds like it was completed for each individual comment. Roll up into a summarized response that matches the issue statement.

Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW	n/a
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MT	
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NV-CA	n/a
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NWCO	n/a
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Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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Response

n/a

n/a

n/a

NOTE TO BLM: Review study and determine if the findings are essentially the same as you've already considered or if they provide new information that should be included in the EIS.

n/a

n/a

n/a

Need to create an issue statement for this section.

Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR	Commenters question the prioritization of vegetation treatments and how BLM management would slow conifer encroachment given existing trends.
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[BLM note: BLM will add more detail about rate of conifer encroachment in Chapter 3]

UT n/a

ID-SW n/a

MT

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

More detail about the rate of conifer encroachment will be added to Chapter 3. Juniper and sagebrush treatments in the Proposed Plan will be refined to be more lek-centric.

Use of Integrated Vegetation Management Handbook (H-1740-2) policies for conifer encroachment will incorporate BLM's best available science and management to design and maintain vegetation management projects, and entail the use of adaptive management to improve outcomes. Present trends toward conifer expansion do not indicate that future management will be unsuccessful in limiting expansion.

n/a

n/a

n/a

n/a

n/a

n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

Sounds more like affected  
environment issue/response.

Move to section 26.2

Plan	Issue Statement
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- OR Commenters proposed modifications to the alternatives and concerns about specific topics include:
1. Establishment of priorities for vegetation treatments to maximize GRSG benefit
  2. Limitations on vegetation treatments in sagebrush habitat, including avoiding use of fire and sagebrush removal in sensitive habitats or seasons
  3. More detail on proposed restoration activities including allowable treatment methods in GRSG habitat
  4. Increased juniper removal and prioritization for phase I and II woodlands, where success is more likely
  5. Testing restoration methods on a small scale
  6. Rest from grazing for two seasons following all vegetation treatments
  7. Improved consistency in recommendations on native plant materials for restoration
  8. Invasive spread prevention and more proactive invasive control methods
  9. Evaluation of use of fire for vegetation control in cheatgrass-prone areas
  10. Establishment of sagebrush reserves for

UT The DEIS failed to consider a full range of alternatives Commenters provided specific suggestions to meet the objectives related to the COT Report.

Commenters provided additional measures that should be considered in the alternatives, including,

- Pinyon-juniper restoration
- Specific objectives to measure success

ID- Commenters recommended that the  
SW preferred alternative include:  
MT

- Specific vegetation treatment acreage objectives
- Passive sagebrush restoration
- Limitations on vegetation treatments in sagebrush areas. To meet COT report objectives, include regulatory mechanisms to avoid sagebrush removal or manipulation in sage-grouse breeding or wintering habitats with minor exceptions.
- Establish Priorities for pinyon-juniper removal including reduced grazing in conjunction with pinyon-juniper treatment.
- Restore non-native seedings to increase GRSG habitat
- Apply additional restrictions for herbicide application in GRSG habitat
- Commit to a program to plan, fund, execute and monitor large scale integrated invasive species infestation and eradication projects in a measurable timeframe.
- Include specific objectives to measure success in invasive species eradication



NV- Issue 1: Multiple commentors were  
CA concerned with pinion-juniper expansion.

Issue 2: Sagebrush managment and cheatgrass control.

Issue 3: Multiple commentors are concerned with the source, level of detail, and ability of management actions in Chapter 2 to conserve sage grouse habitat.

Issue 4: Commenters noted that some of the alternatives presented in Chapter 2 did not adequately address the relationship between vegetation management and livestock grazing management.

In general, topics of concern included pinyon-juniper encroachment; impacts of grazing and fire; restoration; application of ecological site description and reference state concepts; and the effects of recreation.

Move comment 188-20 to NEPA range of alts  
- deals with burden of costs.

NW The Draft EIS should include additional  
CO conservation measures from the COT in one  
or more alternatives, including controls for  
preventing the spread of invasive, non-native  
plants.

Lewis The BLM should include additional measures  
town to target conifer encroachment and ensure  
no net conifer gain in the FEIS.

ND n/a  
WY9

Response	NCT Notes
<p>1. Establishment of priorities for vegetation treatments is in Proposed Plan. The Proposed Plan has lek-centric management with respect to weed treatments, junpier treatments, and sagebrush restoration. [BLM note: BLM to add to Proposed Plan]</p>	<p>It seems like this may be addressing comments on an individual basis. Consider revising issue statement and developing response around general themes.</p>
<p>2. The alternatives contain seasonal restrictions. Proposed Plan has modified seasonal restrictions. Fire has some benefits to sagebrush ecosystems. [BLM note: BLM to add to Proposed Plan]</p>	
<p>3. Priority areas and treatment methods are identified in Proposed Plan. [BLM note: BLM to add to Proposed Plan]</p>	
<p>4. Phase I and II was prioritized in Alternative D. Funding influences the ability to increase removal.</p>	
<p>5. Testing restoration methods is not a land use planning decision.</p>	
<p>6. BLM policy is to rest from grazing until treatment objectives are reached.</p>	
<p>7. Proposed Plan will address inconsistency and BLM handbooks will be added to Chapter I for native plant use and weed management.</p>	
<p>8. Proposed Plan targets invasives control around leks. [BLM note: BLM to add to Proposed Plan]</p>	
<p>9. It is BLM policy to evaluate areas for invasive plant invasion prior to fire treatment.</p>	
<p>10. Alternative F established 4 million acres of sage grouse ACECs.</p>	
<p>11. The BLM does not manage sagebrush on private lands.</p>	
<p>12. There is no data that identifies treatment quantities.</p>	
<p>13. Lek-centric management of junpier treatments will provide greater benefit to GRSG.</p>	
<p>14. Feasibility is based on prior experiences. 15. Literature supports active restoration. [BLM note: BLM to add paragraph to Ch 3 sections describing important and relevant handbooks/manuals/etc.]</p>	

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

Also, as previously noted, the relative emphasis given to particular resources and resource uses differs as well, including allowable uses, restoration measures, and specific direction pertaining to individual resource programs. When resources or resource uses are mandated by law or are not tied to planning issues, there are typically few or no distinctions between alternatives. The six alternatives are described in Table 2-1, Description of Alternatives A, B, C1, C2, D, E1, and E2, in Section 2.6, Detailed Comparison of Alternatives, of the Draft EIS.

Additionally, Sections 4.3 and 7.5 of this report discuss how the BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and Forest Service regulations, policy and guidance.

The ID/SWMT LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. The BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and Forest Service regulations, policy and guidance.

Some of the recommended components were addressed in the DEIS and additional info will be included in the FEIS as detailed below.

- Specific vegetation treatment acreage objectives [need National Policy team input- to decide how treatment objectives will be incorporated]
- Passive sagebrush restoration: In the DEIS Alternative C and management changes that allow progress towards standards and guidelines allow for passive sagebrush restoration. In some areas passive restoration may not be sufficient to improve GRS habitat and active restoration may be necessary (Davies et al. 2011) (see pp 4-54 DEIS [- check page]).
- Limiting vegetation treatments in sagebrush areas is covered under Alternative D ([provide pg reference]. To meet COT report objectives, include regulatory mechanisms to avoid sagebrush removal or manipulation in sage-grouse breeding or wintering habitats with minor exceptions. [include info from FEIS specific to meeting COT report objectives if appropriate])
- Establish Priorities for pinyon-juniper removal including reduced grazing in conjunction

Some of the commenter points sound like unsupported opinion directing BLM to a specific action. Suggest deleting those or revising the issue statement if there is some supporting rationale that indicates inadequate NEPA

Issue 1: [BLM to provide response]

Issue 2: [BLM to provide response]

Issue 3: The information presented in the range of alternatives is based on the best available science such as NTT report, COT report and other relative studies.

BLM will review studies in the DEIS and add additional analysis for the FEIS as necessary.

Issue 4: BLM will analyze the relationship between vegetation management and grazing management in the FEIS based on those actions brought forward for the proposed alternative.

Issue 3: This can be included in section 26.2. The question of best available information is more fully answered there.

[Note to BLM: BLM should read and consider all comments under this topic. Most reference a specific management action and suggest changes or clarifications.]

The Draft EIS contains an ~~entire~~ appendix (Appendix I) that articulates Required Design Features (RDFs), Preferred Design Features (PDFs) and Suggested Design Features (SDFs). While the list of PDFs/RDFs/SDFs in Appendix I is thorough, the list is not intended to be exhaustive; additional PDFs/RDFs/SDFs could be developed and implemented to help achieve resource objectives. PDFs/RDFs/SDFs include state-of-the-art measures applied on a site-specific basis to avoid, minimize, reduce, rectify, or compensate for adverse environmental or social impacts. They are applied to management actions to help achieve desired outcomes for safe, environmentally responsible resource development by preventing, minimizing, or mitigating adverse impacts and reducing conflicts. PDFs/RDFs/SDFs also can be proposed by project applicants for activities on public lands (e.g., for gas drilling). PDFs/RDFs/SDFs not incorporated into the permit application by the applicant may be considered and evaluated through the environmental review process and incorporated into the use authorization as conditions of approval or ROW stipulations. Standard conditions of approval and ROW stipulations from each LUP would apply to site-specific analysis. Additional PDFs/RDFs/SDFs, conditions of approval, and ROW stipulations could be developed to meet resource objectives based on local conditions and resource specific concerns.

As noted previously in Section 7.3 of this Report, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. Each of the alternatives considers [NOTE TO BLM: No response provided until BLM determines which changes are needed. Response should explain which changes were made and where. If no change made, explain why the alternatives are sufficient].

[Change to FEIS: Consider adding an acreage range for conifer treatments for analysis. Provide a definition of old growth conifer stand to be added to the glossary]

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific mechanical treatments come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the

n/a





Plan Issue Statement

OR The DEIS fails to provide adequate baseline information related to invasive species spread and juniper establishment. Commenters requested assumptions for the VDDT modeling, and references for statements regarding climate change and spread of invasive species.

More specific comments focused on:

1. Expansion rate of juniper needs to be identified.
2. Effects of mowing on bunchgrass.
3. How much would need to be treated to reach desired conditions.
4. Management of juniper stumps.

UT Commenters requested the FEIS be consistent with local GRSG management plans. The FEIS should use more accurate habitat mapping and scientific literature. The DEIS fails to provide adequate baseline information.

ID- The DEIS fails to provide adequate baseline  
SW information related to sagebrush vegetation.  
MT Commenters questioned the source of BLM  
data and requested the FEIS utilize additional  
baseline data on cheatgrass extent and  
evaluate effectiveness of continuing programs  
against weeds and juniper encroachment.  
Commenters provided additional literature to  
consider. Commenters also advocated an  
adaptive approach to vegetation management  
based on site-specific habitats.

NV- Issue 1: Additional literature or information is  
CA needed related to pinion-juniper expansion.

Issue 2: Additional information or literature is  
needed for sagebrush management and  
cheatgrass control.

Issue 3: BLM needs to consider additional  
literature in the EIS as a basis for the  
alternatives and analysis. BLM incorrectly  
interpreted the literature cited in the EIS.  
BLM needs to provide rationale and sources  
of information to support the alternatives,  
affected environment, and impacts analysis  
within the EIS (e.g. for ecological site and  
reference state concepts, VDDT modeling,  
and utilization levels).

Move comments related to use of stubble  
height as an indicator to riparian section.

Move (all or part of) 205-30 and 205-31 to  
Climate Change, baseline info.

Move comment 270-1 to riparian, best  
available info

Move 278-29 to grazing, best available info

Move 308-16 to grazing and possibly sage

NW The BLM failed to consider research by CPW  
CO on the range of canopy cover preferred by  
Greater Sage grouse.

Lewis n/a  
town

ND The DRMPA/DEIS fails to take a hard look at  
I/I the history of agency seeding of nonnative  
species and the predictable but unmitigated  
outcomes when those species become  
invasive or out of control.

WY9

Before beginning the land use plan amendment process and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan-level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects proposed for implementation under the land use plan. The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 in the Draft EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft EIS. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions. The BLM used the most recent and best information available that was relevant to a land use planning-scale of analysis. During preparation of the LUPA/EIS, the BLM consulted with and used data from other agencies and sources, including but not limited to U.S. Geological Survey, Oregon state agencies, and the U.S. Fish and Wildlife Service. The BLM consulted on the analysis and the incorporation of available data into the EIS with its cooperating agencies and other agencies with jurisdiction or expertise.

1. [BLM note: BLM to provide expansion rate of juniper in Chapter 3]
2. [BLM note: BLM to add Chapter 3 info on bunchgrass mowing]
3. Proposed Plan vegetation treatment objectives address desired outcomes.

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendixes in the Draft LUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/EIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions. The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan amendment. These subsequent NEPA analyses will tier to the land use planning analysis and evaluate project impacts at the site-specific level (see 40 CFR 1502.20 and 1508.28). As part of the NEPA process, the public will be presented with the opportunity to participate in the environmental analysis process for these future implementation actions.

Before beginning the land use plan amendment process and throughout the planning effort, the BLM and FS considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan-level. The data needed to support broad-scale analysis of the 48,209,900 acre planning area are substantially different than the data needed to support site-specific analysis of projects proposed for implementation under the land use plan. Much of the data in the DLUPA/EIS is presented in qualitative and map form, and is sufficient to support the gross scale analyses required for land use planning.

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 in the Draft LUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/EIS. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions.

The BLM used the most recent and best information available that was relevant to a land use planning-scale of analysis. During preparation of the LUPA/EIS, the BLM consulted with and used data from other agencies and sources, including but not limited to U.S. Geological Survey, Idaho state agencies, and the U.S. Fish and Wildlife Service. The BLM consulted on the analysis and the incorporation of available data into the LUPA/EIS with its cooperating agencies and other agencies with jurisdiction or expertise.

Before beginning the land use plan amendment process and throughout the planning effort, the BLM and FS considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan-level. The data needed to support broad-scale analysis of the planning area are substantially different than the data needed to support site-specific analysis of projects proposed for implementation under the land use plan. Much of the data in the DLUPA/EIS is presented in qualitative and map form, and is sufficient to support the gross scale analyses required for land use planning.

Adaptive management would be incorporated into vegetation treatment and restoration programs under Alternatives D and E. Adaptive management would allow BLM increased flexibility to adjust programs based on data collected during operation, to respond to changing conditions and improve effectiveness of vegetation management programs.

[BLM: provide direction if any change to analysis is necessary. Notes during cmt response



The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/DEIS.

It seems that the general idea of all three issues is that additional information or literature is needed. Suggest combining all three issues into one overall issue statement.

A land use planning-level decision is broad in scope, and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM and Forest Service realize that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Before beginning the Nevada and Northeastern California Greater Sage-Grouse DLUPA/DEIS process and throughout the planning effort, the BLM and Forest Service considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan-level.

The BLM and Forest Service used the most recent and best information available that was relevant to a land use planning-scale of analysis. During preparation of the DLUPA/DEIS, the BLM and Forest Service consulted with and used data from other agencies and sources, including but not limited to [insert sources such as USFWS, NDOW, counties or conservation districts]. The BLM and Forest Service consulted on the analysis and the incorporation of available data into the DLUPA/DEIS with its cooperating agencies and other agencies with jurisdiction or expertise.

As a result of these actions, the BLM and Forest Service gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DLUPA/DEIS. The BLM and Forest Service utilized the available data to provide an

As noted previously in Section 4.5 of this Report, the BLM and the Forest Service consulted with, collected, and incorporated data from other agencies and sources, including but not limited to the U.S. Fish and Wildlife Service and Colorado Parks and Wildlife [list others if needed]. The BLM reviewed the current research by CPW on the range of canopy cover preferred by sage grouse to determine if it presented new information that would need to be incorporated into the FEIS, was information already included in the draft EIS, or if it provided the same information as already used or described in the Draft EIS. The BLM determined that... [NOTE TO BLM: confirm that this is true. If it wasn't used in the draft, explain why, e.g., it wasn't yet available, etc. If this is new information that should be considered between Draft & Final, then note that you've reviewed it and make a brief statement to what your findings were (e.g., info was the same, info was n/a

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DRMPA/DEIS. There has been extremely limited historic seeding of non-native species in association with ROWs, construction areas, etc. in the North Dakota Field Office. Additionally, there are no converted fields on BLM lands. Therefore, an exhaustive gathering and monitoring of baseline data related to BLM seeding practices is not required for the North Dakota Greater Sage-Grouse LUPA/EIS.

The North Dakota Field Office gathered the necessary data essential to make a reasoned choice among the alternatives analyzed in detail in the DRMPA/DEIS. The BLM utilized the available data to provide an adequate analysis that led to an adequate disclosure of the potential environmental consequences of the alternatives. Baseline data on noxious weeds and invasive plant species is included in Section 3.5 of the DRMPA/DEIS (p. 3-18 to 3-29). Specific reference is made to the presence of weeds, with waterways and transportation systems being the major vectors of spread. The impacts on the spread of weeds from these types of activities are more thoroughly described in the vegetation section of



Plan Issue Statement

OR Commenters request more detailed analysis of the objectives and impacts of vegetation treatment on GRSG, and parameters on allowable treatments to reduce impacts, including limits on allowable methods during lekking and nesting season, and buffers around nesting areas. Commenters state that juniper treatment and invasive weed control efforts have been ineffective and request further analysis.

More specific comments focused on:

1. The use of only native seeds.
2. Post planting evaluations.
3. Objective to treat approximately 30% of GRSG habitat over the next 10 years.

UT Commenters requested the BLM to analyze each contiguous block of occupied habitat and publish in the FEIS the percentage of sagebrush cover in that block. The scientific findings for impacts to GRSG from reduced juniper encroachment are contradictory to the impacts in the DEIS.

ID- Commenters express concern about  
SW unintended or undesirable impacts of  
MT vegetation management programs to control  
weeds or restore sagebrush habitat. The DEIS  
inadequately analyzes impacts from vegetation  
restoration

NV- BLM has failed to analyze or has incorrectly  
CA analyzed impacts on vegetation in the EIS,  
particularly related to the following issues:

Issue 1: Additional literature or information is needed related to pinion-juniper expansion to support impact analysis.

Issue 2: Additional information or literature is needed for sagebrush management and cheatgrass control to support impact analysis.

Issue 3: BLM needs to consider additional literature in the EIS as a basis for the alternatives and analysis. BLM incorrectly interpreted the literature cited in the EIS. BLM needs to provide rationale and sources of information to support impacts analysis within the EIS (e.g. for ecological site and reference state concepts, VDDT modeling, and utilization levels).

Re-code 91-66 to climate change, grazing, or water resources. Also re-review to determine if substantive.

NW n/a  
CO  
Lewis n/a  
town  
ND n/a  
WY9

Response	NCT Notes
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The DRMPA/DEIS provides an adequate discussion of the environmental consequences of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Suggest adding reference to the location where each of the numbered responses can be found in the EIS.

1. Proposed Plan uses native and non-native seeds.
2. Proposed Plan will conduct post planting evaluations.
3. Proposed Plan does not contain 30% requirement, instead it is lek-centric

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental

The DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man’s environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

[Note to BLM/FS: insert whether any changes are made to the EIS and if so, where in the document]

[BLM: develop response]

This issue summary is very similar to section 26.2 of this report. Suggest combining and responding in one location.

n/a

n/a

n/a





Plan	Issue Statement
OR	Commenters noted the treatment rate of 1% is inadequate.
UT	n/a
ID-SW	BLM's cumulative impacts analysis for
MT	vegetation failed to consider the impacts of limited resources on sage-grouse protection.

NV-CA BLM needs to substantiate the claim that a reduction in grazing would result in increased fuel loads and increase the frequency of wildfire on the landscape and should evaluate whether it is better to manage for higher levels of vegetation which would lead to higher fire probability or manage for less canopy spacing to reduce

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## Response

The analysis shows a treatment rate of 1% is inadequate. Vegetation management objectives were revised while still taking into consideration GRSG.

n/a

[Unsure if we need to keep this national response]: Cumulative analysis for the DEIS was primarily qualitative in nature due to the time schedule of implementation of sage-grouse protection efforts. The FEIS will incorporate data from the BLM National Operations Center for the planning area and WAFWA management zone, to enable BLM to evaluate cumulative impacts quantitatively for each alternative.

The proposed plan habitat mapping combines the habitat maps from Alternatives D and E, including other refinements. The cumulative effects assessment for the proposed plan is included in the FEIS and captures the effects from the revised habitat map

Suggest BLM review the comment and determine whether a revision to the EIS is necessary. If revised, indicate what changes were made and where. If not, provide rationale as to why the current cumulative impact analysis is sufficient.

n/a

n/a

n/a



Plan Issue Statement

OR Commenters request clarification on vegetation treatments.

UT Commenters requested clarification on several mitigation measures including what would be desirable non-native seeds, how livestock grazing is managed post vegetation treatment, and how reclamation is counted towards disturbance thresholds.

ID- Commenters requested detailed plans of  
SW action and clarification on mitigation and  
MT monitoring, including timing of re-seeding and  
restoration after fire.

NV- BLM needs to highlight preventative measures  
CA to mitigate natural disturbances and increase  
vegetation resilience and health. The BLM and  
Forest Service needs to provide more detail  
regarding its vegetation monitoring program.  
Citations should be provided where necessary  
to support proposed mitigation measures  
(see comment 0091-77).

NW Commenters requested clarification on  
CO several mitigation measures including what  
would be appropriate plant regrowth or  
cover requirements, thresholds for  
determining when mitigation standards have  
been met, and procedures for monitoring  
mitigation measures. Additionally, the Draft  
EIS needs to explicitly state the required  
methodology to use when determining  
whether a mitigation standard has been met  
or not.

Lewis n/a  
town  
ND n/a  
WY9

Response	NCT Notes
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Vegetation management and restoration projects will be targeted to benefit GRSG habitat. Vegetation treatment locations and activities are identified as specific project-level vegetation treatments are conducted.

The methodology that will be employed to determine effective mitigation is the monitoring framework developed by a Disturbance and Monitoring Team (see Appendix X in the FEIS) [NOTE TO BLM: EMPSi will complete appendix number once added to the FEIS.] that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets were established so that data can easily be "rolled up" for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013).

Incorporate information in current response and include at end of national response.

[Refer to the Monitoring Framework in the appendix.] To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

[NOTE TO BLM (Alan): Provide a response that addresses what is a desirable seed.]

National/common language for Regional Mitigation



To accomplish effective monitoring, the BLM and the Forest Service will analyze mitigation and monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat changes.

[Note to BLM/FS: Insert national monitoring response when available] Will develop an implementation plan to guide activities after the ROD.

#### National/common language for Regional Mitigation

Mitigation has been further defined as a Regional Mitigation Framework and is detailed in Appendix X. The Framework is incorporated in the [insert Proposed Plan/Proposed Plan Amendment] and was developed to achieve a net conservation gain to the species by implementing conservation actions. Regional mitigation is a landscape-scale approach to mitigating impacts to resources. This involves anticipating future mitigation needs and strategically identifying mitigation sites and measures that can help achieve the greatest conservation benefit for greater sage-grouse and its habitats.

If impacts to greater sage-grouse or its habitat from authorized land uses remain after applying avoidance and minimization measures, then compensatory mitigation projects will be used to fully offset impacts to achieve conservation benefits. Any compensatory mitigation will be durable, timely, and in addition to that which would have resulted without the compensatory mitigation.

Specific mitigation strategies, based on the Framework, will be developed by regional

Need a response to each of the statements above.

Here is some generic language regarding monitoring. Will probably need to include language about the revisions to the monitoring framework on a national level:

The methodology that will be employed to determine effective mitigation will be the monitoring framework developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013). Broad- and mid-scale monitoring will be conducted as funding allows.

Additional details regarding monitoring are presented in the Monitoring Framework, Appendix xx. To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA and/or state wildlife agencies, effectiveness monitoring can be supplemented with population trend information, taking into consideration the lag effect response of populations to habitat

*[NOTE TO BLM: Some of the comments could be fixed is possible editorial clarifications in the FEIS. If this is the case, then a note of “In response to comments requesting clarification of certain mitigation language, the FEIS has been corrected in response to these comments.” For the monitoring aspect, suggest using language similar to what’s noted below:]*

In response to comments requesting clarification of certain mitigation language, the FEIS has been corrected in response to these comments. Additional information on mitigation can be found in Section XX of the FEIS.

The methodology that will be employed to determine effective mitigation will be the monitoring framework developed by a Disturbance and Monitoring Team that focuses on the implementation and effectiveness of the conservation measures in the planning documents. The BLM and the Forest Service worked with WAFWA to define a standardized process for data sharing and definitions of priority areas of conservation boundaries. Monitoring methods and indicators were derived from the best available science. Corporate data-sets will be established so that data can easily be “rolled up” for reporting monitoring results across the range of greater sage-grouse, as defined by Schroeder et al. (2004); by populations and subpopulations as defined by Connelly et al. (2004); by LUP area; by the seven (WAFWA) Greater Sage-grouse Management Zones (Stiver et al. 2006), and by Priority Areas for Conservation (PACs) as defined in the greater sage-grouse Conservation Objectives Team (COT) Report (U.S. Fish and Wildlife Service 2013). *[If needed, based on specifics of comments and/or summary statement, include statement to the effect that broad- and mid-scale monitoring will be conducted as funding allows.]*

*[Refer to the Monitoring Framework in the appendix.]* To accomplish effective monitoring, the BLM and the Forest Service will analyze the monitoring data to characterize the relationship among disturbance, implementation actions, and habitat condition at the appropriate and applicable geographic scale or boundary. When available from WAFWA  
n/a

n/a



Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW	n/a
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MT	
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NV-CA	Issue 1: BLM should not rely on incomplete Ecological Site Descriptions (ESD)s
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Issue 2: BLM and USFS should recognize that management needs for riparian areas are often site specific and that a one-size fits all approach to is not supported by science and in the literature. BLM also needs to incorporate principles of adaptive management into livestock grazing strategies for riparian areas.

NWCO	n/a
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Lewisto	n/a
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wn	
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ND	n/a
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WY9	
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## Response

n/a

n/a

n/a

Response 1 (subject to revision):Although not complete, ESDs are in the process of being developed for riparian areas and wetlands. In 2011, the NRCS issues draft guidelines for lotic areas (NRCS 2011, see discussion of this topic; section 4.5.5, Alternative B, Impacts from Riparian Areas and Wetland Management). Use of ESDs will result in more site specific and more appropriate objectives and management actions for riparian habitats.

Response 2: Meeting standards for rangeland health (Table 2-6) can be achieved through a variety of livestock grazing strategies including use of adaptive management techniques. Adaptive management consists of refinements to the management strategy based on annual analysis of monitoring information relative to short term events and indicators (Wyman et al. 2006). Where monitoring demonstrates standards are not being met and livestock are the causal factor, principles of adaptive management provide for adjustments in management strategies where appropriate. Annual indicators of livestock grazing impacts on riparian areas, including measurements of residual vegetation (stubble heights) and/or riparian plant utilization may indicate a need to employ rest or deferment from grazing. Once progress is being made towards meeting GRS habitat objectives, adaptive management and/or other site specific management strategies can continue to be

n/a

n/a

n/a



Plan	Issue Statement
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OR	Commenter asked about tamarisk and GRS habitat.
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UT	The alternatives in the DLUPA/DEIS fail to address riparian conditions adequately.
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ID-SW MT	Commenters suggested management approaches for riparian vegetation, including removal of invasive tamarisk, limitations on or removal of livestock grazing, and maintenance of sage-grouse habitat objectives.
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NV-CA	<p>The BLM and Forest Service should not use stubble height as a habitat objective in riparian areas and should develop more appropriate riparian management objectives. In addition, PFC is an inappropriate measurement of GRS habitat suitability. The BLM and Forest Service must establish widths for riparian management zones. A requirement of a 1/2 mile buffer around riparian areas and leks for livestock supplements and handling facilities is inadequate to protect GRS. DEIS should establish a timeframe for meeting goals and objectives for riparian areas.</p>
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BLM should not rely on incomplete Ecological Site Descriptions (ESD)s

BLM does not provide summary statistics for

NWCO	The BLM should include management actions to address PJ incursions within the range of alternatives.
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Lewisto n/a  
wn  
ND n/a  
WY9

## Response

Tamarisk is invading tree-dominated areas. Tree-dominated areas are not associated with GRS habitat.

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives.

The ID/SWMT LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft LUPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for riparian vegetation in the planning area that would meet the planning criteria, to address issues and comments from cooperating agencies and the public, and provide a reasonable range of alternatives. The BLM and the Forest Service complied with CEQ regulations in developing the range of alternatives and the spectrum of actions considered all meet BLM and Forest Service regulations, policy and guidance.

[BLM: provide direction if any change to analysis is necessary.]

For stubble height triggers to be implemented, a determination has been made that rangeland health standards for riparian areas have not been met and that livestock, rather than wild horses or some reason, is the causal factor. In terms of applicability of stubble height requirements to various site conditions, consideration is provided for "site capability and potential" (Table 2.7, Pg. 356). We recognize use of stubble height criteria is not appropriate for all sites.

Response 2: The Proper Functioning Condition (PFC) assessment protocol addresses the basic processes which sustain water tables and riparian plant communities. If a riparian area is not functioning properly, then it is likely the biological processes, such as creation of suitable habitat will be impaired. The PFC protocol is designed to help establish and prioritize management, monitoring and restoration activities and to provide a focused and effective foundation for determining resource goals and identified resource values (Prichard et al. 1998, Dickard et al. 2014). Use of this process optimizes management of GRS habitat through a sequential set of steps which include: determination of resource values; development and prioritization of goals and actions; collection of baseline data and establishment or modification of objectives; implementation of planned actions and effectiveness monitoring including updating PFC status; and, implementation of adaptive management actions (Dickard et al. 2014).

Response 3: All available data for condition of riparian areas across the planning area are summarized in Table 3.13. These data, which include riparian acreages, miles of stream and number of assessments are expressed as percent of lotic and lentic riparian areas meeting goals. Refer to section 3.4 section (Riparian Areas and Wetlands) for a discussion of these findings.

The original direction that initiated this planning process for the BLM can be found in BLM IM-2012-44. The BLM was tasked with analyzing the conservation in the NTT Report, "The conservation measures developed by the NTT and contained in Attachment I must be considered and analyzed, as appropriate, through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-Grouse habitat."

As such, creation of new conservation measures that were not contained in the NTT report are out of scope for this planning process.

n/a

n/a

Is this even a substantive comment? Consider removing comment, issue, and response. Need to address adequacy of alts in protecting riparian communities.

Need to link this response back to the issues in the issue statement.

Consider numbering issues and response to are easily linked.

Move ESD issue statement to 27.0

Plan	Issue Statement
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- |    |   |
|----|---|
| OR | Commenters noted concerns about inconsistencies in DEIS and recommended literature to review.   |
| UT | The lack of an adequate baseline on water quality needs to be noted in the DEIS and where surveys have been completed, results reported. The Final LUPA/EIS should note that current PFC assessment methods need to be modified to incorporate sage-grouse needs. |

ID-SW  
MT

Commenter requests baseline data related to Proper Functioning Condition of riparian areas in sage-grouse habitat. Commenter questions whether PFC protects stability of riparian habitat for sage-grouse.

NV-CA

The BLM and Forest Service should incorporate additional literature to improve the impact analysis in the EIS. The BLM and Forest Service provided insufficient sources regarding riparian baseline information.

NWCO The BLM needs to expand on the information presented in the affected environment specifically for acreage of sage grouse habitat in riparian areas that is not meeting PFC and explaining what irrigated lands are on BLM and FS administered lands.

Lewisto n/a  
wn  
ND n/a  
WY9

## Response

BLM will review potential inconsistencies and available literature and incorporate into the EIS as necessary.

The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Utah Greater Sage-Grouse LUPA is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.

The BLM and the Forest Service complied with these regulations in describing the affected environment. The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The affected environment provided in Chapter 3 and various appendices including Appendices A, N, O, P, and Q in the Utah Greater Sage-Grouse LUPA is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the DLUPA/EIS. For example, listing every water quality-impaired stream within the planning area by name would not provide useful information at this broad-scale analysis, particularly where the proposed plan alternatives did not vary the level of riparian protections to provide reduced levels for non-impaired streams. The riparian protections within each alternative were applied to all streams, whether or not they were water quality-impaired. However, understanding the miles of impaired BLM streams, as presented in the DLUPA/EIS at Section 3.6.1, is useful in establishing a baseline by which the BLM may analyze the relative effects of each alternative's broad-based approach.

As specific actions come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental Proper Functioning Condition of riparian systems according to BLM Manual 1737 includes stabilization of streambanks, maintenance of ponding, reduction in erosion, and other features beneficial to sage-grouse. Restrictions on grazing in riparian areas are considered in current BLM management to reduce trampling and overuse caused by livestock. Re: PFC data – not always available on a sub-regional level. Data have been included when available on a sub-regional level. [BLM: provide direction if any change to analysis is necessary.]

[Clean up this text: 36 CFR etc is a reference to the 2012 planning rule. These amendments are being promulgated under the transition provisions of the 2012 rule to use the 1982 rule which most of the ID/MT FS plans were developed under. Therefore, that CFR does not apply]

BLM: Include description of changes to EIS here or rationale for why no change is needed.

*[NOTE TO BLM: Assuming that the first part is extraneous information, see the response below. If it could be useful for analysis, then it may only need a quick explanation in qualitative text. The second part is likely editorial and could be addressed with text updates in the FEIS.]*

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 and various appendixes in the Draft LUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/EIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions. The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan amendment. These subsequent NEPA analyses will tier to

n/a



Link response back to issues in  
issue statement. Seem  
disconnected.

Link response back to issues in  
issue statement. Seem  
disconnected.

Plan	Issue Statement
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OR n/a

UT The DEIS failed to adequately analyze the impacts of water developments on riparian areas.

ID-SW n/a

MT

NV-CA The BLM and Forest Service relied on incorrect assumptions when conducting the impact analysis on riparian areas. The BLM and Forest Service provided no basis for the conclusions in the EIS and need to quantify impacts to riparian areas.

NWCO n/a

Lewisto n/a

wn

ND The DRMPA/DEIS violates NEPA because it fails to consider the effects of livestock grazing on the sagebrush and the spread of cheatgrass adequately.

WY9

## Response

n/a

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA

n/a

BLM: Include description of changes to EIS here or rationale for why no change is needed.

n/a

n/a

The BLM has revised the description of cheatgrass existing conditions in the North Dakota Greater Sage-Grouse planning area with more recent data. Although cheatgrass is present in the planning area, it is not prevalent or listed as a threat to GRSG in the COT Report. Sections 3.X and 3.X have been revised accordingly in the FEIS.

This should be moved to  
Vegetation - Sagebrush,  
Section 26.

Plan	Issue Statement
OR	The benefits to riparian vegetative communities is not discussed in the cumulative impacts section in the DEIS.
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

[Note to BLM: Please provide direction for this response.]

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	Commenter notes that current PFC
MT	assessment methods should be modified to address sage-grouse needs. Commenter requests site-specific management of riparian habitat to balance competing uses.

NV-CA n/a

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

n/a

Proper Functioning Condition of riparian systems according to BLM Manual 1737 includes stabilization of streambanks, maintenance of ponding, reduction in erosion, and other features beneficial to sage-grouse.

Under the proposed plan, adaptive management would be incorporated into vegetation treatment and restoration programs, including riparian management. Adaptive management would allow BLM increased flexibility to adjust programs based on data collected during operation, to respond to changing conditions and improve effectiveness of vegetation management programs.

FRI M: provide direction if any change to analysis is necessary.

n/a

n/a

n/a

n/a

Incorporate this issue and response with  
Section 27.2

Plan	Issue Statement
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OR	n/a
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UT	The DEIS fails to incorporate Garfield County's Visual Resource Management plan in any discussion and are therefore inconsistent with the County plan.
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ID-SW	n/a
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MT	
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NV-CA	n/a
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NWCO	n/a
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Lewisto	n/a
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wn	
----	--

ND	n/a
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WY9	
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## Response

n/a

The BLM land use plans and amendments must be consistent with officially approved or adopted resource-related plans of local governments to the extent that these resource-related plans comport with FLPMA and other Federal laws and regulations (see 43 CFR 1610). The BLM has worked closely with local governments during preparation of the Draft LUPA/EIS. The BLM works to find a balance among uses and needs as reflected in these local government plans and has done so in the preparation of the LUPA/EIS; a list of these plans can be found in Section 1.8, Relationship to Other Policies, Plans, and Programs. While the BLM is not obligated to seek consistency, the agency is required to describe the inconsistencies between the proposed action and the other plans, policies, and/or controls within the FIS. This information has been

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	



Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	The BLM must comply with Nevada Water Rights and the plan should not threaten private water rights.

NWCO The BLM needs to include a list of impaired watersheds as part of the affected environment to more accurately discuss potential impacts to the watersheds from actions. Additionally, the impact analysis for watersheds is based on inaccurate assumption that all streams and waterbodies are currently meeting State Water Quality Standards.

The water impact analysis needs further discussion to support the claim that longer directional drilling reaches would increase the likelihood for impacts on groundwater quality.

Lewisto n/a  
wn  
ND n/a  
WY9

## Response

n/a

n/a

n/a

In the document the BLM must state that the policy will not threaten private water rights and will comply with water law. 130-5 Does this need to be discussed in the EIS? The BLM does not have the authority to make private water to be used for SG. The BLM does not have the jurisdiction.

0259-16 Need to reword 8th bullet on page A-17 to ensure it does not conflict with water rights.

393-5 BLM needs time to review section 4.16.2 to respond.

[NOTE TO BLM: Assuming that the list of watersheds wasn't included because of the relevant scope of the project, see the response below. If this is not the case, and it would be relevant to include, then we can modify the response and note that the information will be included in the FEIS. Including the watershed information would resolve the assumption issue. I'd suggest also revising the FEIS impact analysis to clarify statement on groundwater quality impacts.]

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 and various appendixes in the Draft LUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/EIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions. The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan amendment. These subsequent NEPA analyses will tier to the land use planning analysis and evaluate project impacts at the site-specific level (see 40 CFR 1502.20 and 1508.28). As

n/a

n/a

notes in response should be rolled into response to the issue statement. May only need to cite to a planning criteria that says BLM will comply with existing laws, that BLM is in compliance with state laws/plans/policies, etc. and cite the relevant section where further detailed explanation is noted (e.g., tabs 5.2, consistency under FLPMA, and



Plan	Issue Statement
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OR	Commenter noted concerns pertaining to probability of impacts vs certainty of impacts.
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UT	Commenters requested an alternative where lost sagebrush habitat on federal land is restored to pre-settlement conditions be considered. BLM and Forest Service must defer decisions with regard to the size of ponds to those private landowners.
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ID-SW	n/a
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MT	
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NV-CA	The BLM should clarify that PFC is not a desired condition and the meaning of benefit. The BLM should clarify that water developments must be consistent with State Water Law and coordinate with existing water rights holders.
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NWCO	n/a
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Lewisto wn The FEIS should use measurable benchmarks, such as Ecological Site Descriptions, for riparian areas. The FEIS should clarify if allotments in PPH and PGH, and stream PFC ratings are a priority for improvement.

ND WY9 n/a

## Response

Specific text will be revised in terms of "probability of impacts".

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage-grouse in the planning area, the BLM and the Forest Service fully considered the management opportunities presented in the Analysis of the Management Situation (AMS) and the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DI UPA/FIS that best addressed  
n/a

BLM not sure how to respond but believe these might be chapter 2 edits.

n/a

Section 1.5 of the DRMPA/DEIS describes how the Lewistown Field Office Greater Sage-Grouse RMPA/EIS planning team employed the BLM planning process to develop a reasonable range of alternatives for the RMPA. The BLM complied with NEPA and the CEQ implementing regulations at 40 CFR 1500 in the development of alternatives for this draft RMPA/EIS, including seeking public input and analyzing reasonable alternatives. The alternatives include management options for the planning area that would modify or amend decisions made in the field office RMPs, as amended, to meet the planning criteria, to address issues and comments from cooperating agencies and the public, or to provide a reasonable range of alternatives. Since this is a plan amendment to address GRSG conservation, many decisions from the field office RMPs are acceptable and reasonable. In these instances, there was no need to develop alternative management prescriptions.

The DRMPA/DEIS states that land health assessments and grazing permit renewals under agency preferred alternative (Alternative D), would be completed as they expire within watershed areas. Watershed areas in PH that contain expired or expiring grazing authorizations would be prioritized for renewal. Table 3-45, Lewistown Field Office Planning Area – Land Health Assessment, summarizes the BLM-administered acres in PPH and PGH not meeting land health standards because of livestock grazing management. Table 3-21, PFC Assessments within GRSG Habitat on BLM-Administered Lands, summarizes the stream and riparian conditions in PPH and PGH.

PFC it is the BLM-required protocol for assessment of streams and riparian-wetland areas, and it is the minimum standard for achievement of BLM land health standards. Alternative D in the DRMPA/DEIS, , goes beyond PFC by requiring that land health evaluations and determinations include (at a minimum) indicators and/or measurements of structure/condition/composition of vegetation specific to achieving GRSG habitat objectives. Management actions would be developed if land health determinations indicate that an allotment is not meeting standards due to current livestock grazing. Appendix B addresses mid-scale monitoring. State objectives would be used for fine scale analysis unless local objectives are developed at the field office level, in partnership with MFWP and USFWS. See Figure 2-7 (Appendix A).

Ecological site descriptions, riparian proper functioning condition (PFC) protocols, water quality data, and various types of appropriate vegetative, riparian, habitat, and any other applicable data would continue to be used as the basis in allotment  
n/a

NCT Notes

Regional Team NOTES, EDITS, COMMENTS

sounds like general NEPA  
issue relevant to impact  
analysis. Delete from here  
(water resources range of  
alts). If relevant to water  
resources range of  
alternatives, clarify this in the  
issue statement & response  
how is the first sentence  
related to range of alternatives  
for water resources? Revise to  
clarify or delete.  
Response doesn't specifically  
address issue in sentence #2.  
Revise accordingly

First sentence in issue  
statement sounds like it was  
or should be addressed under  
tab 27, riparian vegetation.

Plan	Issue Statement
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- OR Commenters noted concerns pertaining to inaccurate water quality, water quantity, and water rights information, and recommended literature to review.
- UT Comments stated BLM cannot violate Utah laws and requested more stringent and expanded assessments of rangeland health and proper functioning condition.

ID- n/a

SW

MT

NV- The FEIS should include the number of miles  
CA of 303(d) listed streams located within PPMA's and the miles/acres not supporting the Propagation of Wildlife beneficial use water

NW n/a

CO

Lewis Commenters requested the number of  
town allotments in PPH and PGH meeting  
I/I rangeland health standards.

ND n/a

WY9

Water resource information and available literature will be reviewed.

As stated in Section 4.1.1, implementing actions from any of the LUPA alternatives would be in compliance with all valid existing rights, federal regulations, BLM and Forest Service policies, and other requirements [NOTE TO BLM: should language be added in FEIS pertaining to State laws?].

Utah's Standards for Rangeland Health and Guidelines for Grazing Management were developed in accordance with 43 CFR-4180 to provide for conformance with the Fundamentals of Rangeland Health. Through conformance and attainment of Utah's Standards and Guidelines, Utah BLM assures that the Fundamentals of Rangeland Health are met. It is beyond the scope of this EIS to revise existing guidelines for rangeland health or technical reports for riparian-wetland areas.

n/a

BLM needs to speak internally with GIS department about changes.

n/a

Allotments have been assessed for adherence to the Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the BLM for Montana and the Dakotas (Appendix F of the DRMPA/DEIS). An assessment of rangeland health standards and guidelines has been made on all allotments in the planning area. Table 3-45, Lewistown Field Office Planning Area – Land Health Assessment, summarizes the BLM-administered acres in PPH and PGH not meeting land health standards because of livestock grazing management. Under the agency preferred alternative (Alternative D), range management decisions, the DRMPA/DEIS states that land health assessments and grazing permit renewals would be completed as they expire within watershed areas. Watershed areas in PH that contain expired or expiring grazing

This seems like it might fit better with included in the livestock or vegetation rather than with water resources.

n/a





Plan Issue Statement

OR Commenters noted concerns about accuracy of impact analysis on water resources from livestock grazing and vehicle travel.

UT Commenters requested that the impacts on water from eroding soil and manure be analyzed for each alternative; supporting documentation that fluid mineral development can have an adverse impact on water quality; and a description of how Pinyon/Juniper encroachment affects water resources.

ID- The EIS fails to address impacts on the soil  
SW and watershed conditions resulting from  
MT grazing-sourced manure, soil erosion and  
pathogen contamination under each  
alternative and to provide appropriate  
mitigation measures. Such an analysis should  
include a list of impaired waters and the  
sources of contamination for those waters.  
The EIS also fails to address the negative  
impact on GRSG of restricting or removing  
water developments under Alternative D

NV- The BLM Needs to better analyze for impacts  
CA from minerals management.

NW n/a

CO

Lewis n/a

town

ND The DRMPA/DEIS does not provide detailed analysis of Proper Functioning Conditions in riparian areas. Include an analysis of how many acres/stream miles will be brought into Properly Functioning Condition, and how quickly, for each alternative.

WY9

Impact analysis on water resources from livestock grazing and vehicle travel will be clarified.

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

NOTE TO BLM: BLM should review impact discussions under soil and water resources under each alternative and consider mentioning any appropriate beneficial impacts on soils and watersheds that would result from grazing restrictions.

NOTE TO BLM: BLM should review impacts on GRSG from grazing under Alternative D and consider whether it is appropriate to identify adverse impacts on GRSG through the restriction or removal of grazing-related water developments.

[NOTE TO BLM: Discuss with biologists the impacts of the removal of water development on Sage Grouse.]

303d listed streams are discussed in Section 3.16.2.

BLM needs to review section to determine if permits are referenced in the document.

Need to find acres with mineral withdrawal.

Need to review new alternative E to see if comment is still relevant. If it is not relevant respond with changes to alternative E.

BLM needs to change/check the analysis to address comment 0188-41, 43,.

0344-42- Accept part of the changes (from mining to oil and gas) not accept other changes.

Soil erosion and water quality impacts from livestock grazing discussed in chapter 4.16.

n/a

n/a

**As noted in section 4.6, impact analysis, of this report** the DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. ~~As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short term uses of man's environment and the maintenance and enhancement of long term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.~~

~~Land use plan level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site specific project and implementation level actions. The site specific analyses will tier to the plan level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.~~

As indicated in Table 3-10 in Section 3.5.2, not all of the riparian areas in the planning area are currently in PFC. Many of the planning decisions, such as those related to grazing and riparian area management, are designed to move non-functioning areas towards PFC.



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	The BLM should clarify how the plan will integrate with existing drought management guidelines and requirements
NWCO	n/a
Lewisto	Commenters requested the cumulative impacts analysis discuss the benefits to water developments and include information on compliance with MT water quality standards.
wn	
ND	n/a
WY9	

## Response

n/a

n/a

n/a

[No response provided]

n/a

The BLM understands the potential beneficial cumulative impacts to water resources from water developments and has revised the cumulative impacts analysis in Section 5.17 of the PRMPA/FEIS [NOTE TO BLM: recommend revising analysis accordingly]. The potential impacts of livestock on water quality as recognized (see DEIS pp 4-145) All BLM management actions would be in compliance with state water quality standards, as required by law.

n/a



double check to see if drought  
is addressed in the climate  
change section.

Plan	Issue Statement
------	-----------------

OR	n/a
UT	Commenters requested BLM adopt a consistent method to determine droughts and then record and publically share that declaration, including consistent changes in grazing management that accompany that declaration.

ID- n/a  
SW  
MT  
NV- n/a  
CA

NW n/a  
CO  
Lewis n/a  
town  
ND n/a  
WY9

Response	NCT Notes
<p>n/a</p> <p>The BLM and the Forest Service complied with the NEPA by including a discussion of measures that may mitigate adverse environmental impacts of the alternatives in the DLUPA/EIS. See 40 CFR 1502.14(f), 1502.16(h). Potential forms of mitigation include: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. 40 CFR 1508.20. The BLM and the Forest Service must include mitigation measures in an EIS pursuant to the NEPA; yet the BLM and the Forest Service have full discretion in selecting which mitigation measures are most appropriate, including which forms of mitigation are inappropriate.</p>	<p>Other drought issues addressed in section 10 of this report. Consider moving this to that section and combining responses to form one complete response.</p>
<p>n/a</p>	
<p>n/a</p>	
<p>n/a</p>	
<p>n/a</p>	
<p>n/a</p>	



## **NEED TO BE CONSISTENT ON WHAT MANA**

Plan	Issue Statement
OR	<p>The BLM did not consider alternatives which adequately limited or managed wild horses in the planning area. The BLM should include greater justification for increasing or decreasing AUMs for wild horse. In addition, the BLM should provide details on how HAF will be utilized in management of WHB. The BLM should also provide information on current wild horse populations and clarify if populations exceed AML.</p>

UT The majority of the commenters were concerned about grouping livestock and wild horses and burros together in the plan and the 25% reduction in AML under Alternative C2 (and the basis for the reduction). The commenters wanted the 25% reduction evaluated again based on the fact that only 2% of the sage grouse habitat overlapped with HMAs.

Commenters also suggested the following edit/additions/clarifications to the preferred alternative:

- Outline a reduction, and if necessary elimination of livestock grazing, before any reduction of AUMs for wild horses and/or burros could occur.
- Add a commitment to consider drought conditions when establishing AMLs;
- Include a measure to develop scientific procedures that can be replicated to count horses so that proper management actions can be implemented when numbers exceed AMLs;
- Specifically identify the processes (i.e., HMAs, NEPA) through which management

ID-SW Commentors were concerned about  
MT grouping of livestock and wild horses  
together in management actions.  
Commentors were also concerned with the  
25% proposed reduction of AML under  
Alternative F and the basis for reduction;  
they requested reevaluation of reduction  
based on the fact that wild horse habitat  
overlaps a minimal percentage of GRSG  
habitat.  
Commentors also requested consideration  
of the following in the FEIS:  
Require that any land policy changes  
resulting from the sage grouse plan be in  
conformance with the National Academy of  
Sciences 2013 recommendations for reform  
of the federal wild horse management  
program.  
Provide flexibility to increase AML/AUM  
and/or open HAs if data becomes available  
demonstrating that genetic viability of wild  
horses and burros is threatened.  
Commentors also feel that the preferred  
alternative would give the BLM too much  
discretion to reduce AMLs or zero out  
HMAs which would violate the BLM's legal

NV-CA The DEIS fails to comply with the FLPMA and WFRHBA by restricting wild horses. One commenter was concerned that "Table 2.1 appears to suggest that feral horse and burro are not subject to reductions in population".

#### Summary for Range of Alternatives

The majority of the commenters were concerned about grouping livestock and wild horses and burros together in the plan and the equal reduction in forage under the Alternatives. The commenters wanted the reduction evaluated again based on the fact that only 12% of the sage grouse habitat overlapped with HMAs.

Commenters also suggested the following edit/additions/clarifications to the preferred alternative:

- Require that any land use policy changes resulting from the sage grouse plan be in conformance with the National Academy of Sciences' 2013 recommendations for reform of federal wild horse management program.

Commenters were also concerned about

NWCO The BLM should link the Colorado Monitoring Framework with the vegetation studies. Additionally, BLM should have considered AMLs for drought conditions in the range of alternatives.

Lewisto n/a

wn

ND n/a

WY9



## MANAGEMENT ACTIONS RELATING TO AMLS ARE AVAILABLE AND IN SCOPE FOR T

### Response

The BLM considered a reasonable range of alternatives during the Greater Sage-Grouse planning process in full compliance with the NEPA. See Section 4.3, NEPA Range of Alternatives, in this section for an expanded explanation on what constitutes a reasonable range of alternatives. The CEQ regulations (40 CFR 1502.1) require that the BLM consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage grouse in the planning area, the BLM fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives which best addressed the issues and concerns identified by the affected public.

The BLM protects, manages, and controls wild horses in accordance with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195, as amended), the purpose of which is to "manage wild horses and burros within herd management areas (HMAs) designated for their long-term maintenance, in a manner designed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships." The FLPMA directs the BLM to manage wild horses and burros as one of numerous multiple uses including mining, recreation, domestic grazing, and fish and wildlife. It also required a current inventory of wild horses and burros. Additional guidance is found in 43 CFR 4700, Protection, Management, and Control of Wild Free-roaming Horses and Burros. The BLM does not manage for feral horses. Funding and priority for management and removal of wild horses and burros are determined by national level priorities and land health considerations.

Reducing AML does fall within the legal mandate of the BLM to protect WHB. Through the BLMs program of monitoring and analysis of data, AMLs have been established and will continue to be adjusted based on the analysis of data. AMLs can be adjusted based on the limitations and capability of the range, including the four habitat components, while managing for healthy populations of

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sage-grouse planning process in full compliance with the NEPA. See Section 4.3, NEPA Range of Alternatives, in this section for an expanded explanation on what constitutes a reasonable range of alternatives. The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/DEIS that best addressed the issues and concerns identified by the affected public.

The BLM protects, manages, and controls wild horses in accordance with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195, as amended), the purpose of which is to "manage wild horses and burros within herd management areas (HMAs) designated for their long-term maintenance, in a manner designed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships." The FLPMA directs the BLM to manage wild horses and burros as one of numerous multiple uses including mining, recreation, domestic grazing, and fish and wildlife. It also required a current inventory of wild horses and burros. Additional guidance is found in 43 CFR 4700, Protection, Management, and Control of Wild Free-roaming Horses and Burros.

Several comments were related to decision making that falls outside the scope of the Utah Greater Sage-Grouse LUPA/EIS. Reducing AML does fall within the legal mandate of the BLM to protect WHB. Through the BLMs program of monitoring and analysis of data, AMLs have been established and will continue to be adjusted based on the analysis of data. AMLs can be adjusted based on the limitations and capability of the range, including the four habitat components, while managing for

The BLM and the Forest Service considered a reasonable range of alternatives during the greater sagegrouse planning process in full compliance with the NEPA. [See Section 4.3, NEPA Range of Alternatives, in this section for an expanded explanation on what constitutes a reasonable range of alternatives.](#) The CEQ regulations (40 CFR 1502.1) require that the BLM and the Forest Service consider reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. While there are many possible alternatives or actions to manage public lands and greater sage grouse in the planning area, the BLM and the Forest Service fully considered the planning issues and criteria developed during the scoping process to determine a reasonable range of alternatives. As a result, six alternatives were analyzed in detail in the DLUPA/DEIS that best addressed the issues and concerns identified by the affected public.

The BLM protects, manages, and controls wild horses in accordance with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195, as amended), the purpose of which is to "manage wild horses and burros within herd management areas (HMAs) designated for their long-term maintenance, in a manner designed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships." The FLPMA directs the BLM to manage wild horses and burros as one of numerous multiple uses including mining, recreation, domestic grazing, and fish and wildlife. It also required a current inventory of wild horses and burros. Additional guidance is found in 43 CFR 4700, Protection, Management, and Control of Wild Free-roaming Horses and Burros.

Reducing AML does fall within the legal mandate of the BLM to protect WHB. Through the BLMs program of monitoring and analysis of data, AMLs have been established and will continue to be adjusted based on the analysis of data. AMLs can be adjusted based on the limitations and capability of the range, including the four habitat components, while managing for healthy populations of WHBs in balance with other uses and resources (including sage grouse). Should the 25% reduction

The BLM protects, manages, and controls wild horses in accordance with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195, as amended), the purpose of which is to "manage wild horses and burros within herd management areas (HMAs) designated for their long-term maintenance, in a manner designed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships." The FLPMA directs the BLM to manage wild horses and burros as one of numerous multiple uses and sustained yield including mining, recreation, domestic grazing, and fish and wildlife. It also required a current inventory of wild horses and burros. Additional guidance is found in 43 CFR 4700, Protection, Management, and Control of Wild Free-roaming Horses and Burros. **The BLM does not manage for feral horses and burros.**

Reducing AML does fall within the legal mandate of the BLM to protect WHB. Through the BLMs program of monitoring and analysis of data, AMLs have been established and will continue to be adjusted based on the analysis of data and the achievement of management goals and objectives including rangeland health standards and sage grouse habitat objectives. AMLs can be adjusted based on the limitations and capability of the range, including the four habitat components, while managing for healthy populations of WHBs in balance with other uses and resources (including sage grouse).

The current proportion of wild horse and burro AUMs compared to permitted livestock AUMs is fairly small across all HMAs. Many allotments reflect AMLs in which the AUMs are only a small percentage of the total AUMs allocated, however in some cases the AUM allocations for WH&B is equal to or exceed those allocated to domestic livestock. In addition, despite the fact that the wild horse and burro AUMs (AML) are lower than the livestock AUMs in most circumstances, actual use by wild horses has almost always exceeded the established AML on average. Additionally, livestock operators generally do not use all of the available AUMs on an annual basis.

The BLM established AML for each herd management unit in each of its relevant existing land use plans for the field offices in NW Colorado. Establishing new AML levels in the sage-grouse plan amendment is out of scope.

n/a

n/a

**THIS PROJECT. VARIES BETWEEN ADJUSTING,**

NCT Notes

Change "should" to "need" to make it sound less like an opinion, or rewrite otherwise.

Last sentence in issue statement and associated response should be moved to 30.1

Need to discuss AUMs in response, or make link between AML and AUM (see UT response)

The suggestions in the issue statement seem to be opinion. If one or more of these are not opinion, make sure they are reworded and addressed in the response.

Incorporate NAS issue statement with 30.I and remove from this section.



Remove any issue statements that are opinions, or reword to make them substantive.

Address helicopter issue in response.

Move NAS issue to 30.1.

All other subregions say that reducing AMLs are within the capabilities and scope of the EIS. Response does not address the Colorado Monitoring Framework.



Regional Team NOTES, EDITS, COMMENTS



















**Need to be consistent on how NAS report will be**

Plan	Issue Statement
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OR	The BLM should consider the findings and recommendations of the National Academy of Sciences (NAS) report.
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UT Commenters request documentation of critical genetic data on each of the wild horse and burro herds in the planning area. This will provide BLM basis for identifying which HMAs would not be feasible to place AML reductions on while maintaining genetically viable herds.

Commenters did not feel that the NTT and COT report clearly identified the differences between livestock and wild horse and burros and their impacts on Sage Grouse. Therefore, by using these two reports and their approach, the BLM and Forest Service wrongly categorized livestock and wild horses together under the description of livestock.

Commenters were also concerned that the National Academy of Sciences' 2013 recommendations for reform of federal wild horse management program were not utilized in this LUPA/EIS.

ID-SW Commenters request documentation of  
MT critical genetic data on each of the wild  
horse and burro herds in the planning area.  
This will provide BLM basis for identifying  
which HMAs would not be feasible to place  
AML reductions on while maintaining  
genetically viable herds. Commentors also  
requested exact population data for all wild  
horse populations in HMAs and HAs and  
clearly defined maps of HMAs and HAs.

NV-CA Commenters are concerned of the lack of  
discussion of the detrimental influence of  
wild horses and burros on rangeland health.  
Commenters were also concerned that the  
National Academy of Sciences' 2013  
recommendations for reform of federal wild  
horse management program were not  
utilized in this LUPA/EIS.  
A specific comment identified that there  
were errors within the Chapter 3 WHB  
map, Specifically "T48N to T46N and R18E  
to R21E are and never have been feral horse  
range, nor are they HMA contrary to what  
your map shows. Please correct this in the  
final EIS".

Commenters are concerned the proposed  
EIS combines animal unit months for  
privately owned domestic livestock with wild

NWCO n/a  
Lewisto n/a  
wn  
ND n/a  
WY9

## e implemented or considered in the FEIS.

### Response

[Note to BLM: Have Bob check with national WHB team for national response on how the recommendations in the NAS report will be incorporated once the report is finalized.]

[Note to EMPSi: The NAS report is not finalized, and the report has been submitted and the BLM is in the process of completing a report on how they will implement the recommendations. National WHB team may have a standard response. The finalized NAS report and BLM implementation reports will be considered in the development of the FEIS and actions appropriate to the land management planning level included as appropriate. Many of these actions would be considered under a separate NEPA action 1

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in Chapter 3 and various appendixes in the Draft LUPA/DEIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/DEIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions. The BLM will conduct subsequent project-specific NEPA analyses for projects proposed for implementation under the land use plan amendment. These subsequent NEPA analyses will tier to the land use planning analysis and evaluate project impacts at the site-specific level (see 40 CFR 1502.20 and 1508.28). As part of the NEPA process, the public will be presented with the opportunity to participate in the environmental analysis process for these future implementation actions.

Before beginning the land use plan amendment process and throughout the planning effort, the BLM considered the availability of data from all sources, adequacy of existing data, data gaps, and the type of data necessary to support informed management decisions at the land use plan-level. The data needed to support broad-scale analysis of the 48,209,900 acre planning area are substantially different than the data needed to support site-specific analysis of projects proposed for implementation under the land use plan. Much of the data in the DLUPA/DEIS is presented in qualitative and map form, and is sufficient to support the gross scale analyses required for land use planning.

The BLM used the most recent and best information available that was relevant to a land use planning-scale of analysis. During preparation of the LUPA/DEIS, the BLM consulted with and used data from other agencies and sources, including but not limited to U.S. Geological Survey, U.S. Fish and Wildlife Service, state of Utah, and counties. The BLM consulted on the analysis and the incorporation of available data into the LUPA/DEIS with its cooperating agencies and other agencies with jurisdiction or expertise.

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 and various appendixes in the Draft LUPA/DEIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/DEIS.

A land use planning-level decision is broad in scope and, therefore, does not require an exhaustive gathering and monitoring of baseline data. Although the BLM realizes that more data could always be gathered, the baseline data provides the necessary basis to make informed land use plan-level decisions.

Much of the data in the DLUPA/DEIS is presented in qualitative and map form, and is sufficient to support the gross scale analyses required for land use planning. The DEIS includes maps of HMAs and HAs. These maps will be reviewed for accuracy prior to inclusion in the FEIS.

BLM's use of the 2013 National Academy of Sciences (NAS) recommendations to use science to improve BLM's wild horse and burro management will occur primarily during the implementation phase of managing for protecting and improving GRSB habitat.

The USFWS did identify grazing as a threat in the NTT and COT reports but did not specifically delineate between domestic and wild horse and burro grazing. However within the DEIS, BLM did analyze impacts on WHB and domestic livestock grazing separately and also analyzed the impacts on GRSB from WHB and domestic livestock grazing separately. Impacts on GRSB from WHB and domestic livestock grazing are identified in section 4.3 of the LUPA/DEIS. Impacts on WHB from GRSB management strategies are identified in section 4.7 of the LUPA/DEIS.

A specific comment identified that there were errors within the Chapter 3 WHB map, specifically "T48N to T46N and R18E to R21E are and never have been feral horse range, nor are they HMA contrary to what your map shows. Please correct this in the final EIS". The WHB map has been thoroughly reviewed and the area covered by the identified Townships and Ranges are actually within a historic Need name Herd Area (HA) administered by the CA BLM.

Genetic documentation of WHB is an ongoing implementation level process used to monitor the genetic health of BLM's wild horse and burro populations. IM 2009-061.

n/a

n/a

n/a





Regional Team NOTES, EDITS, COMMENTS











**Check for consistency between subregions on ho**

Plan	Issue Statement
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OR	n/a
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UT	<p>The majority of commenters were concerned that the alternatives do not adequately protect wild horses and burros per BLM mandate. They felt the genetic impacts of the proposed plan must be thoroughly examined including scientific data to justify the claim that any removal and upheaval would not negatively affect the genetic diversity of WHB and that any wild horses/burros allowed to remain would be adequate for the genetic viability and future survival of a self-sustaining population.</p>
----	--

They are also concerned that the analysis on GRSG from wild horses and burros are not distinguished from livestock which inaccurately increases the threat. Specifically, wild horse Herd Management Areas only impact 2% of the total Mapped GRSG Occupied Habitat in the planning area, while livestock grazing occurs in 55% of the Mapped GRSG Occupied Habitat. In addition, the BLM allows the equivalent of 253 wild horses vs. 75,769 cows (annual equivalent) in the mapped GRSG occupied areas. This means that there are 300 times

ID-SW  
MT

Commenters were concerned that the DEIS does not adequately protect wild horses and burros per BLM mandate. They are also concerned that the analysis on GRSG from wild horses and burros are not distinguished from livestock which inaccurately increases the threat. Specifically, wild horse Herd Management Areas only impact a small amount of the total Mapped GRSG Occupied Habitat in the planning area. Commenters identified contradictions in the document such as where the document states that "Under all alternatives, no direct change would occur to areas allocated as HMAs/WHBTs for wild horses and burros", then the report proceeds to summarize how every single alternative would restrict wild horse and burro usage in their own federally designated habitats.

NV-CA The BLM fails to analyze the impacts of reductions in forage allocations on Wild Horses.

The majority of commenters were concerned that the alternatives do not adequately protect wild horses and burros per BLM mandate. ~~They felt that the BLM failed to analyze the impacts of reductions in forage allocations on Wild Horses and Burros.~~

Commenters were also concerned that the analysis of impacts on GRSG from wild horses and burros was not distinguished from livestock which inaccurately skews the impacts.

Commenters also identified contradictions in the document such as where the document states that "Under all alternatives, no direct change would occur to areas allocated as HMAs/WHBTs for wild horses and burros", then the report proceeds to summarize how parts of alternative would restrict wild horse

NWCO n/a

Lewisto n/a

wn

ND n/a

WY9

**w WBH and livestock grazing/AUMs were addressed.**

Response

n/a

The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

The BLM did analyze impacts on WHB and domestic livestock grazing separately and also analyzed the impacts on GRSG from WHB and domestic livestock grazing separately. Impacts on GRSG from WHB and domestic livestock grazing are identified in Section 4.2 of the DLUPA/DEIS. Impacts on WHB from GSRG management strategies are identified in Section 4.10 of the DLUPA/DEIS. BLM appropriately analyzed the impacts to WHB from actions not related to changes in AML.



The DLUPA/EIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DLUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DLUPA/EIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29; Forest Service Handbook 1909.12 – Land Management Planning). The DLUPA/EIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions. Proposed changes to HMAs would consider GRSG habitat and land health. Any changes in AML would require additional site specific NEPA analysis. The language in the FEIS related to the potential reduction of AMLs will be clarified as appropriate for the 25% reduction under Alternative F.[BLM –need to check language in FEIS]

The USFWS identified grazing as a threat in the NTT and COT report but did not specifically delineate between livestock and WHB grazing. However, within the DEIS, the BLM and Forest Service did analyze impacts on WHB and domestic livestock grazing separately and also analyzed the impacts on GRSG from WHB and domestic livestock grazing separately. Impacts on GRSG from WHB and domestic livestock grazing are identified in Section 4.X of the DLUPA/DEIS. Impacts on

The BLM protects, manages, and controls wild horses in accordance with the Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195, as amended), the purpose of which is to "manage wild horses and burros within herd management areas (HMAs) designated for their long-term maintenance, in a manner designed to achieve and maintain a thriving natural ecological balance (TNEB) and multiple use relationships." The FLPMA directs the BLM to manage wild horses and burros as one of numerous multiple uses including mining, recreation, domestic grazing, and fish and wildlife. It also required a current inventory of wild horses and burros. Additional guidance is found in 43 CFR 4700, Protection, Management, and Control of Wild Free-roaming Horses and Burros.

Reducing AML does fall within the legal mandate of the BLM to protect WHB. Through the BLMs program of monitoring and analysis of data, AMLs have been established and will continue to be adjusted based on the analysis of data and the achievement of management goals and objectives including rangeland health standards and sage grouse habitat objectives. AMLs can be adjusted based on the limitations and capability of the range, including the four habitat components, while managing for healthy populations of WHBs in balance with other uses and resources (including sage grouse).

In the development of the DEIS BLM did analyze impacts on WHB and domestic livestock grazing separately and also analyzed the impacts on GRSG from WHB and domestic livestock grazing separately. Impacts on GRSG from WHB and domestic livestock grazing are identified in section 4.3 of the LUPA/DEIS. Impacts on WHB from GSRG management strategies are identified in section 4.7 of the LUPA/DEIS.

Text in the WHB impact section will be reviewed and any contradictory statements will be taken out of the FEIS.

n/a

n/a

n/a

## NCT Notes

Respond to 3rd issue statement about contradictions in the document.

Need to address adequate protection issue or move to 30.0

Respond to issue statement about contradictions in the document.

Need to address adequate protection issue or move to 30.0

Respond to issue statement about contradictions in the document.

Regional Team NOTES, EDITS, COMMENTS





























Plan	Issue Statement
OR	The cumulative impacts of removing water developments on wild horse and burro populations was not discussed in the DEIS.
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

[Note to BLM: Review Chapter 5 to determine if this needs to be added to the FEIS.]

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
OR	n/a
UT	BLM has not fully lived up to its obligations under Manual 6320, undertaking the process required for the planning and management of Lands with Wilderness Characteristics.

ID-SW n/a

MT

NV-CA The implementation of Secretary Salazar's Secretarial Order No. 3310, Section 5(d) and compliance with BLM's Manuals 6310 and 6320 will conflict with the Department of the Interior, Environment and Related Agencies Appropriations Act of 2014.

NWCO The existing LWC inventories are out of date, and the BLM failed to conduct updated inventories for lands with wilderness characteristics.

[Under Section 33.0 in NWCO document]

Lewisto n/a

wn

ND n/a

WY9

## Response

n/a

BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, requires the BLM to update and maintain a wilderness inventory consistent with BLM wilderness characteristics inventory guidance. It also directs the BLM to use the land use planning process to determine how to manage lands with wilderness characteristics as part of the BLM's multiple-use mandate. However, BLM Manual 6320 also states, "In some circumstances, consideration of management alternatives for lands with wilderness characteristics may be outside the scope of a particular planning process (As dictated by the statement of purpose and need for the planning effort). For example, a targeted amendment to address a specific project or proposal may not in all circumstances require consideration of an alternative that would protect wilderness characteristics. In these situations, the NEPA document associated with the plan amendment must still analyze effects of the alternatives on lands with wilderness characteristics."

Inventories for wilderness characteristics were conducted from 1979 to the present and reflect the most up-to-date lands with wilderness characteristics baseline information for this planning area. In addition to the inventories conducted for the purposes of land use planning, lands with wilderness characteristics inventories will be updated for site-specific project NEPA analyses that are conducted in the planning area to determine if a project will have impacts on lands with wilderness characteristics identified through previous or updated inventory efforts.

As noted on page I-4, the purpose of and need for the national GRSG planning effort is limited to making land use planning decisions specific to the conservation, enhancement, and/or restoration of GRSG habitat specifically by reducing, eliminating, or minimizing threats to that habitat. No decisions related to the management of lands with wilderness characteristics will be made as part of this planning effort; therefore, management of lands with wilderness characteristics is considered outside the scope of this plan amendment process. Impacts on lands with wilderness characteristics from the alternatives being analyzed for this planning effort are presented in Chapter 4, Section 4.14, Lands with Wilderness Characteristics.

n/a

Secretarial Order 3310 (issued in December of 2010) was never implemented, the Department of Defense and Full-Year Continuing Appropriations Act of 2011 (PLI 12-10) prohibited the use of funds to implement the Secretarial Order during fiscal year 2011. The primary direction under S.O. 3310 was the designation of "Wild Lands" that were to be derived from wilderness characteristics inventories. Since that time BLM has provided additional policy in 2012 in the form of Manuals 6310 and 6320 which excludes any designation of "Wild Lands" but continues to provide direction for the inventory of public lands for wilderness resources under FLPMA sections 201 and 202 which is considered appropriate under the

As noted on page 395, the purpose of and need for the national GRSG planning effort is limited to making land use planning decisions specific to the conservation of GRSG habitats. No decisions related to the management of lands with wilderness characteristics will be made as part of this planning effort; therefore, management of lands with wilderness characteristics is considered outside the scope of this plan amendment process. Impacts on lands with wilderness characteristics from the alternatives being analyzed for this planning effort are presented in Chapter 4, Section 4.20, Lands with Wilderness Characteristics.

As part of the original FLPMA Section 603-mandated inventories, inventories were conducted during past RMP revisions and amendment efforts, and through other various lands with wilderness characteristics inventory updates that have recently taken place. Inventories for wilderness characteristics were conducted for each field office, including some ongoing inventories and reflect the most up-to-date lands with wilderness characteristics baseline information for this planning area. For inventories that were conducted after 2011, findings were documented following guidance in BLM Instruction Memorandum 2011-154, Requirement to Conduct and Maintain Inventory Information for Wilderness Characteristics and to Consider Lands with Wilderness Characteristics in Land Use Plans, which is now encompassed in BLM Manuals 6310 and 6320. Lands with wilderness characteristics inventories will be updated for any site-specific project NEPA analyses that are

n/a

n/a



Plan Issue Statement

OR The BLM did not consider actions within Wilderness and WSAs to benefit GRSG, such as native seed planting, removal of structures, and changes to recreation management.

The BLM should identify actions to maintain lands with wilderness characteristics in PPMA, connectivity, and PGMA habitat areas and analyze the impacts of proposed management on lands with wilderness characteristics. The BLM did not adhere to Manual 6320 by not adequately considering lands with wilderness characteristics in the land use planning process.

Identification and discussion in the DEIS of positive and negative effects on lands with wilderness characteristics is lacking in detail. The DEIS fails to include any discussion of impacts on areas identified by members of the public as having wilderness characteristics.

UT n/a  
ID- All lands with wilderness characteristics that  
SW overlap with Greater Sage-Grouse habitat  
MT represent good opportunities for Greater Sage-Grouse conservation and should be analyzed to see how managing those lands to protect wilderness characteristics would coincide with Greater Sage-Grouse conservation. The BLM should consider lands with wilderness protection as an alternative to ACEC protection for some areas. The BLM should complete Lands with Wilderness Characteristics inventories and the DEIS should consider potential Lands with Wilderness Characteristics in the scope of this process.

NV- BLM wilderness management plans and the  
CA establishment of lands with wilderness  
characteristics through Manual 6320 in  
current and future land use plan revisions  
should be considered as a means to provide  
protection for the sage grouse and habitat.

NW n/a

CO

Lewis The BLM should employ additional  
town management measures to protect lands with  
wilderness characteristics.

The existing lands with wilderness  
characteristics inventories are out of date,  
and the BLM failed to conduct updated  
inventories for lands with wilderness  
characteristics.

ND n/a

WY9



Response	NCT Notes
<p>As noted on page I-6 of the DRMPA/DEIS, the purpose of the national GRSG planning effort is limited to making land use planning decisions specific to the conservation, enhancement, and/or restoration of GRSG habitat specifically by reducing, eliminating, or minimizing the threats to that habitat. No decisions related to the management of Wilderness, WSAs, or lands with wilderness characteristics will be made as part of this planning effort; therefore, management of Wilderness, WSAs, and lands with wilderness characteristics is considered outside the scope of this plan amendment process. Impacts on lands with wilderness characteristics from the alternatives being analyzed in this planning effort are presented in Chapter 4, Section 4.18, Lands with Wilderness Characteristics.</p> <p>The BLM does recognize that wilderness inventories will need to be completed before an action takes place. However, this is done at the project-scale and impacts on lands with wilderness characteristics would be analyzed at that time. Similarly, actions such as native seed planting, removal of structures, and changes to recreation management are all viable management and restoration options within Wilderness, WSAs, or land with wilderness characteristics, but would be analyzed on a case-by-case basis, as necessary.</p>	<p>It is unclear which response corresponds to each issue. Suggest using bullets or numbering system to distinguish summary and response pairs.</p> <p>The second paragraph of this summary and corresponding response can be moved into section 31.0 of this report. Manual 6320 is already addressed there.</p>
<p>BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, requires the BLM to update and maintain a wilderness inventory consistent with BLM wilderness characteristics inventory guidance. It also directs the BLM to use the land use planning process to determine how to manage lands with wilderness characteristics as part of the BLM’s multiple-use mandate. However, BLM Manual 6320 also states, "In some circumstances, consideration of management alternatives for lands with wilderness characteristics may be outside the scope of a particular planning process (As dictated by the statement of purpose and need for the planning effort). For example, n/a</p> <p>Per BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, "In some circumstances, consideration of management alternatives for lands with wilderness characteristics may be outside the scope of a particular planning process (as dictated by the statement of purpose and need for the planning effort). For example, a targeted amendment to address a specific project or proposal may not in all circumstances require consideration of an alternative that would protect wilderness characteristics. In these situations, the NEPA document associated with the plan amendment must still analyze effects of the alternatives on lands with wilderness characteristics." Therefore, analysis in this planning document regarding LWCs will not be completed.</p> <p>Alternative C considers ACEC designation for Greater Sage Grouse habitat and species protection.</p>	<p>Consider using some language from the ACEC section (8) of this report to support last sentence of response.</p>

Wilderness management plans provide general guidance in the management of the designated area through compliance with the Wilderness Act and policies provided in BLM Manual 6340 – Management of Designated Wilderness. Direction for the management of Threatened and Endangered Species and Restoration –Vegetation Management is provided in Manual 6340; it is Wilderness Act policy on wilderness is that the wilderness resource is the priority. Other resource actions are subordinate to the preservation of wilderness and any actions proposed for other resources such as T & E species can be conducted but at minimum levels, enough to preserve the T & E Species but with minimal impact to wilderness characteristics.

BLM is required by policy through Manual 6320 to consider lands with wilderness characteristics for the management and protection/preservation of those characteristics during a land use plan revision. These lands are considered for the wilderness characteristics they contain, size, naturalness, outstanding opportunities for solitude and/or outstanding opportunities for primitive unconfined recreation. Threatened/endangered or sensitive plant/animal species are not wilderness characteristics, they are rather supplemental values which are not necessary for the determination of wilderness character. The decision to manage or not manage the

n/a

BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, states that, “In some circumstances, consideration of management alternatives for lands with wilderness characteristics may be outside the scope of a particular planning process (as dictated by the statement of purpose and need for the planning effort). For example, a targeted amendment to address a specific project or proposal may not in all circumstances require consideration of an alternative that would protect wilderness characteristics. In these situations, the NEPA document associated with the plan amendment must still analyze effects of the alternatives on lands with wilderness characteristics.” (BLM Manual 6320.06, Policy).

As noted on page I-14 of the Draft RMPA/EIS, the purpose of and need for the National GRSR Planning Strategy is limited to making land use planning decisions specific to the conservation of GRSR habitats. No decisions related to the management of lands with wilderness characteristics will be made as part of this planning effort; therefore, management of lands with wilderness characteristics is considered outside the scope of this plan amendment process.

As part of the original FLPMA Section 603-mandated inventories, inventories were conducted for the LFO in 1979. The intensive inventories published in the early 1980's resulted in the designation of two WSAs that are located outside of this planning area. No other inventories have been completed for lands with wilderness characteristics since then; however, inventories are currently underway as part of the RMP revision process, which began in 2013 and is scheduled to be complete in 2018. Lands with wilderness characteristics inventories will be updated for any site-specific project NEPA analyses that are conducted in the planning area to determine if a project will have impacts to lands

n/a

The response is confusing as currently written. It would help to switch the first and second paragraph. This way the question regarding manual 6320 is answered before elaborating on other policies which were followed. Also consider using some language from other subregions to help clarify.





Plan	Issue Statement
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OR n/a

UT n/a

ID- The BLM should work with Upper Snake staff  
SW to ensure lands with wilderness

MT characteristics inventories and management  
are consistent between this EIS/LUPA and the  
Upper Snake RMP.

The BLM must provide a map of the lands  
with wilderness characteristics and where it  
overlaps with priority habitat.

The FEIS should explain how the BLM will  
comply with the 2014 appropriations bill for  
the Department of the Interior, Environment  
and Related Agencies and with Secretary  
Salazar's Secretarial Order No. 3310.

NV- All lands with wilderness characteristics that  
CA overlap with Greater Sage-Grouse habitat  
represent good opportunities for Greater  
Sage-Grouse conservation and should be  
analyzed to see how managing those lands to  
protect wilderness characteristics would  
coincide with Greater Sage-Grouse  
conservation.

The DEIS needs to consider management of  
lands with wilderness characteristics in the  
scope of this process and needs to discuss  
ongoing lands with wilderness characteristics  
inventories and any potential conflict with the

NW n/a

CO

Lewis n/a

town

ND n/a

WY9

Response	NCT Notes
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n/a

n/a

BLM Upper Snake Field Office continues to evaluate lands with wilderness characteristics within the planning area. Decisions related to lands with wilderness characteristics will be addressed in the Upper Snake EIS/LUP.

Per BLM Manual 6320, Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process, "In some circumstances, consideration of management alternatives for lands with wilderness characteristics may be outside the scope of a particular planning process (as dictated by the statement of purpose and need for the planning effort). For example, a targeted amendment to address a specific project or proposal may not in all circumstances require consideration of an alternative that would protect wilderness characteristics. In these situations, the NEPA document associated with the plan amendment must still analyze effects of the alternatives on lands with wilderness characteristics." Therefore, analysis in this planning document **related to LWCs** will not be completed.

The BLM is not making decisions on lands with wilderness characteristics in this planning effort. Doing so is outside the purpose and need and scope of this EIS.

The focus of management of wilderness characteristics is upon the protection/preservation of wilderness characteristics: size, naturalness, outstanding opportunities for solitude and/or outstanding opportunities for primitive unconfined recreation. The preservation of sage grouse habitat within lands with wilderness characteristics would be a secondary benefit not the primary benefit of any decision to manage wilderness characteristics. Management decisions on activities within lands with wilderness characteristics are not as stringent as those for WSAs or designated wilderness.

The primary direction under S.O. 3310 was the designation of "Wild Lands" that were to be derived from wilderness characteristics inventories. BLM Manuals 6310 and 6320 excludes any designation of "Wild Lands" but continues to provide direction for the inventory of public lands for wilderness resources under FLPMA sections 201 and 202 which is considered appropriate under the Appropriations Act of 2014.

n/a

n/a

n/a

Consider using similar language to section 8 of this document. Language relevant to ACEC issues may be applicable to LWC and may help clarify why LWC is out of scope.

It does not seem that the response fully addresses the issue statement. Answer to Secretary Salazar's Secretarial Order No. 3310? Possibly use some of the language developed by NVCA in section 31.0 of this document.

Second portion of this response may be able to move to section 31.0 of this document. There is already a response to SO 3310. Consider combining the responses to strengthen both.



Plan	Issue Statement
OR	n/a
UT	n/a
ID-	If the BLM does not complete lands with wilderness characteristics inventories, the BLM should use GIS to inventory roadless areas and consider those as potential lands with wilderness characteristics for planning purposes.
SW	
MT	
NV-	Commenters requested clarification regarding how the BLM adapts wilderness management plans to provide opportunities to protect and increase sage grouse habitat where vegetation treatments are limited or disallowed.
CA	

NW n/a

CO

Lewis n/a

town

ND n/a

WY9



Response	NCT Notes
n/a	
n/a	
<p>No decisions related to the management of lands with wilderness characteristics will be made at this part of the planning effort . Decision related to the management of lands with wilderness characteristics are out of the scope of this plan amendment process.</p>	<p>It seems like this response could be combined with section 31.2 of this document. Responses are nearly identical and basically already included in the summary.</p>
<p>Wilderness management plans provide general guidance in the management of the designated area through compliance with the Wilderness Act and policies provided in BLM Manual 6340 – Management of Designated Wilderness. Direction for the management of Threatened and Endangered Species and Restoration –Vegetation Management is provided in Manual 6340; it is Wilderness Act policy on wilderness is that the wilderness resource is the priority. Other resource actions are subordinate to the preservation of wilderness and any actions proposed for other resources such as T &amp; E species can be conducted but at minimum levels enough to preserve the T &amp; E Species</p>	
n/a	
n/a	
n/a	
n/a	
n/a	
n/a	



Plan	Issue Statement
OR	n/a
UT	n/a
ID-SW	n/a
MT	
NV-CA	n/a
NWCO	n/a
Lewisto	n/a
wn	
ND	n/a
WY9	

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a



Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO	n/a
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Lewistow	n/a
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ND	n/a
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WY9

Response

n/a

n/a

n/a

n/a

n/a

n/a

n/a





Plan	Issue Statement
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OR	n/a
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UT	n/a
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ID-SW M	n/a
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NV-CA	n/a
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NWCO The Draft EIS should have considered a cohesive weed management program and the effects of cheatgrass incursions and presence on sage grouse and sagebrush habitat.

Lewistow n/a

ND n/a

WY9

## Response

n/a

n/a

n/a

n/a

As required by 40 CFR 1502.16, the Draft LUPA/EIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. The Draft LUPA/EIS presented the decision-maker with sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

The Draft LUPA/EIS assesses and discloses the environmental impacts associated with invasive and noxious weeds from proposed management actions of other resources and resource uses in Section 4.6, Vegetation (Forests, Rangelands, Riparian and Wetlands, and Noxious Weeds). A discussion of the impacts from noxious weeds on the grouse and its habitat can be found in Section 4.4.2. Greater Sage-Grouse.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1, Chapter II, A-B at 11-13 and Chapter IV, B at 29). The Draft LUPA/EIS contains only planning actions and does not include any implementation actions, such as a cohesive weed management program or plan. A more quantified or detailed and specific analysis would be required only if the scope of the decision included such actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions, which may include but are not

n/a

n/a



Plan Issue Statement

OR The Draft LUPA/EIS failed to adequately address impacts to GRSG from predation.

UT The Draft LUPA/EIS failed to adequately address impacts to GRSG from predation.

ID-SW MT Some commenters state that the BLM does not adequately address the threat of predation or fully analyze the direct, indirect, and cumulative impacts of predation on GRSG populations; Predation was identified as a threat by the state of Idaho. Others question the inclusion of analysis of impacts of anthropogenic structures on predators of GRSG, given that the USFWS did not identify predation as a primary threat to GRSG.

NV-CA The BLM fails to consider the threat of predation on sage-grouse or needs to consider additional information about predation on sage-grouse.

NWCO n/a

Lewisto The BLM failed to adequately address  
wn impacts to GRSG from predation.

ND n/a  
WY9

## Response

The BLM describes the effects of predation on sage-grouse in the Draft EIS; the information used here and in the affected environment was taken from the Baseline Environmental Report (the BER). The BLM has authority to manage the habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks.

While adding management actions specifically to manage predators is outside the scope of the amendment, the BLM has authority to manage the habitat and have provided numerous management actions across the range of alternatives. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat. As stated in Section 1.6.3, Issues Eliminated from Detailed Analysis, in the DRMPA/DEIS, predator control is outside the scope of RMPA. Predator control is allowed on BLM-administered and National Forest System lands and is regulated by state agencies; these comments therefore relate to state-regulated actions and are outside the scope of the plan amendment. The BLM and Forest Service will continue to work with agencies, to address current predation of GRSG. Federal lands in the planning area will remain open to predator control under state laws.

The BLM has authority to manage GRSG habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. However, the DEIS did not explicitly connect the effects of infrastructure and altering sagebrush habitat with the effects this could have on predators and predation of GRSG. Structural range improvements such as fences represent potential predator perches, and altering the sagebrush habitat of the GRSG can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. This information has been included in the Final EIS in Section XX to more clearly state the connection between the direct effects of habitat management and indirect effects of predation. [BLM ACTION ITEM FOR FEIS (Renee): add this impact analysis in GRSG chapter 4.]

The DEIS calls for measures that will substantially reduce disturbances in the bird's habitat, thus reducing predation risk. The

The BLM and the Forest Service describe the threat of predation and addressed the potential effects of predation on GRSG populations in the Draft EIS, [see Section XXX in the Draft EIS](#). The information used in the affected environment section was initially provided in the USFWS Baseline Environmental Report (the BER), Section III, Characterization of Important Threats and Issues. Regarding the threat of predation the BER notes the following:

“With this broad outlook, it is important to recognize that though over-utilization, disease and predation, and chemical poisoning are recognized as having direct effects (such as mortality) on sage-grouse populations—and the effects of these factors may be the principal cause of population declines in local areas during specific years, for example West Nile virus outbreaks—the impact of these factors on rangewide population sustainability are considered relatively small compared to indirect effects on populations via habitat degradation, policy limitations, and competing land uses. Habitat change (Factor A), which represents a suite of changes in both local conditions (implications for forage, cover and nest quality, for example) as well as regional landscape patterns (implications for habitat availability, connectivity, and isolation, for example), includes the bulk of factors identified in previous research and litigation as affecting sage-grouse populations.”

Similarly, While the state of Idaho identified predation as a threat to sage-grouse in the 2006 Conservation Plan for the Greater Sage-grouse in Idaho (Idaho Sage-grouse Advisory Committee 2006), the Plan acknowledges (page 4.104) the following: While some level of predation is always to be expected, the question of how much predation is acceptable before control actions are initiated is difficult to assess. Related to this question is the difficulty of understanding the complex interactions of multiple threats and landscape conditions, and how these factors collectively influence predation. While the FWS did not find predation to be a primary threat, threat of disease or predation is one of the 5 factors under section (4)(a)(1) of the Endangered Species Act that the service must evaluate when making a listing decision. The FWS notes the indirect impacts of land management changes on predation, and stating in their 2010 Warranted but Precluded finding (Federal Register Vol. 75, No. 55 / Tuesday, March 23, 2010, page 13973): “Except in localized areas where habitat is compromised, we found no evidence to suggest predation is limiting greater sage-grouse populations. However, landscape fragmentation is likely contributing to increased predation on this species.” FWS also noted (page 13972) “Reduction in patch size and diversity of sagebrush habitat, as well as the construction of fences, powerlines, and other infrastructure also are likely to encourage the presence of the common raven (Coates et al. 2008, p. 426; Bui 2009, p. 4).

The BLM and the Forest Service have authority to manage the habitat and have provided analysis to describe how the



In the USFWS Service 2010 Listing Decision (75 Federal Register. 13910), the USFWS stated “Based on the best scientific and commercial information available, we conclude that predation is not a significant threat to the species such that the species requires listing under the Act as threatened or endangered.” The USFWS acknowledged that increasing patterns of landscape fragmentation are likely contributing to increased predation on the species and identified two areas where predators may be limiting GRSB populations because of intense habitat alteration and fragmentation. One of the two areas identified is within the Nevada and Northeastern Sub-region in Northeastern Nevada.

The BLM and the Forest Service have authority to manage the habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. Altering the sagebrush habitat of the greater sage-grouse can create an influx of predators into an area and lead to a population decline. Roads, fences, power lines, trails and other disturbances may make access easier for potential predators and increase risks to the species. The Draft EIS calls for measures that will substantially reduce disturbances in the bird’s habitat, thus reducing predation risk. The Draft EIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks. This information can be found in Section XX, page XX of the Draft EIS.

**[NOTE TO BLM: Delete from the response. This info is not needed here, but make sure this information is in the FEIS.]**

~~Greater GRSB are susceptible to predation from egg to adult, leading to the hypothesis that predator control would be an effective conservation tool for GRSB populations. Generally, GRSB nest success and adult survival are high, suggesting that on average predation is not a limiting factor to GRSB populations. GRSB face a suite of predators in sagebrush communities, however, none of the predators specialize in GRSB (Hagen 2011, p 95-100).~~

~~Predator management research has not provided sufficient evidence to support implementation of predator control to improve GRSB populations over broad geographic or temporal scales. The limited information available suggests predator management may provide short term relief for GRSB population sinks in the few cases where the situation has been documented (Hagen 2011, p95-100). Most GRSB research has failed to quantify predator community structure or predation rates in relation to habitat variables, let alone within the landscape contexts. Thus, it is not currently possible to understand relationships among habitat structure, demographic rates of GRSB, and the predator community of an area and to incorporate these into broad scale based predator management programs for GRSB. It is critical for future GRSB~~

n/a

As stated in Section 1.6.4, Issues Considered but Not Further Analyzed, in the DRMPA/DEIS, predator control is outside the scope of RMPA. The State of Montana possesses primary authority and responsibility for managing wildlife within the state. The BLM has authority to manage GRSB habitat and have provided analysis to describe how the numerous management actions across the range of alternatives could affect the habitat and indirectly the effects of predation. The DEIS calls for measures that will substantially reduce disturbances in the bird’s habitat, thus reducing predation risk. The DEIS also calls for careful monitoring of grazing allotments within sage-grouse nesting habitat to ensure suitable grass and forb cover is reserved so we can minimize the associated predation risks.

Predation is one of five specific ESA listing criteria; however the USFWS did not identify predation as a significant threat to sage-grouse populations in their 2010 decision to list the species as warranted for protection under the Endangered Species Act. The USFWS acknowledged that increasing patterns of landscape fragmentation are likely contributing to increased predation on the species and identified two areas, neither in Montana [North Dakota, South Dakota] (southwestern

n/a



## AS THESE ISSUES ARE RELATED TO NOISE I

Plan	Issue Statement
OR	The BLM should correct inconsistencies in sections discussing evaluating the effects of noise on leks and should include new findings from Blickely and Patricelli 2012 in the final EIS.
UT	The BLM and Forest Service failed to provide the science behind how noise level criteria in the alternatives were determined. The BLM and Forest Service must provide the methodology for determining how background ambient noise levels are to be
ID-SW	Commentor states that noise studies cited
MT	in the DEIS are not public and therefore the results are not reproducible; alternative data should be utilized.
NV-CA	Commenters refute the Patricelli study used to determine that low-frequency mining noise does not diminish as it traveled away from its source.

Lewisto Commenters were concerned with the  
wn ambient noise levels in the Draft EIS and  
would like clarification on the noise  
restrictions provided in the alternatives.  
Commenters requested the alternatives  
include a closure to low-level military flights  
over PH and GH during critical GRSG  
season.

ND n/a  
WY9

## MPACTS ON GrSG, SUGGEST MOVING/ADDING THEM AS A SUBHEADER UNDER SECTION 7.10

### Response

BLM: Evaluate new information for potential inclusion in the Final EIS.

[NOTE TO BLM: Provide response to the summary.]

Blickley et al's research on noise and GRSG as since been published :

Blickley J.L, D. Blackwood, and G.L. Patricelli. 2012. Experimental evidence for the effects of chronic anthropogenic noise on abundance of greater sage-grouse at leks. Conservation Biology Vol 26. No 3. 461-471

This literature has been added to the noise section in the FEIS.

[Change to FEIS- add citation and data from this study in noise section. Consider addition of other data to support claims]

BLM to review Patricelli's and other studies referencing noise Ch 4.3.2 and make revisions as necessary.

As noted previously in Section X.X, Best Available Information, the BLM and the Forest Service complied with CEQ regulations in describing the affected environment.

[NOTE TO BLM: If the information is included, then state this. If references were not included, incorporate into FEIS and if possible, provide the specific locations.] Changes made- need to be added to FEIS:

Make changes to Chapter 4.3.2 pgs 14-15 (Locatable, Leasable, and Salable Minerals Management) as follows:

Amstrup and Phillips (1977) found that low-frequency mining noise in the study area was continuous across days and seasons and did not dissipate rapidly as it traveled from its source. The mechanism of how low-frequency noise affected the birds in the study was not known, but it is known that GRSG depend on acoustical signals to attract females to leks (Gibson and Bradbury 1985; Gratson 1993). Noise associated with oil and gas development may have played a factor in habitat selection and a decrease in lek attendance by GRSG (Holloran 2005). Noise from traffic has also been documented to negatively impact GRSG. Blickley et al. (2012a) found a 73% decline in male attendance at leks exposed to traffic noise as well as an increase in stress hormones levels (Blickley 2012b) and a disruption of strutting patterns on leks (Patricelli 2012).

Add the following citations:

Blickley et al. (2012a). Blickley, J. L., Blackwood, and G.L. Patricelli. 2012a. Experimental Evidence for the effects of chronic anthropogenic noise on abundance of greater sage-grouse at leks. Conservation Biology 26:461-471.

Blickley, J. L., K. R. Word, A. H. Krakauer, J. L. Phillips, S. N. Sells, J. C. Wingfield, and G. L. Patricelli. 2012b. Experimental chronic noise exposure is related to elevated fecal corticosteroid metabolites in lekking male greater sagegrouse (*Centrocercus urophasianus*). PLoS ONE 7:e50462.

n/a

Greater sage-grouse conservation measures in A Report on National Greater Sage-grouse Conservation Measures (NTT 2011) were used to form BLM management direction under at least one alternative [Alternative B], which is consistent with the direction provided in BLM Washington Office Instruction Memorandum 2012-044 (the BLM must consider all applicable conservation measures developed by the NTT in at least one alternative in the land use planning process). [NOTE TO BLM: provide a response as to why the dBAs in the RDFs Appendix were incorporated from NTT.]

The BLM does not have the authority to regulate the use of air space for military or other civilian aviation and therefore has not included additional information on low level flights and associated noise [Note- can either include this statement or move comment to out of scope]  
n/a









Plan	Issue Statement
OR	<p>The BLM needs to conduct a NEPA analysis complete with impacts and cumulative effects analysis of the Greater Sage-Grouse Wildfire and Invasive Species Habitat Assessments that was cited in Appendix H. Cooperative weed agreements need to be discussed.</p> <p>Commenters recommended literature to review.</p> <p>Commenters requested revisions/clarifications pertaining to the use of non-native species; the use of herbicides, biocides, and bio-controls; prioritizing invasive species treatments; and how over-utilization by livestock can facilitate invasive</p>
UT	<p>The DLUPA/DEIS failed to adequately provide the baseline information of cheatgrass infestation. The DLUPA/DEIS failed to consider County designated noxious weeds. Commenters provided specific management actions to meet the COT Report objectives.</p>

ID-SW Commenters request analysis of past  
MT vegetation treatment programs and  
recommend scientific literature on effects of  
vegetation treatments. One commenter  
requests baseline data on cheatgrass in  
planning area. In addition, one commenter  
requests that partnerships with private  
landowners to control cheatgrass are  
considered in the FEIS.

NV-CA Move comments to 26.0 Vegetation to be  
addressed under the cheatgrass issue theme.  
0091-64 - best available info  
1095-17 - range of alternatives  
0205-45 - impact analysis  
0346-16 - baseline info

NWCO n/a

Lewisto wn Commenters requested a description of integrated vegetation management and how BLM will address invasive trees in riparian habitats. The BLM failed to provide adequate analysis of the impacts of weeds related to livestock grazing.

ND n/a  
WY9

## Response

The assessments in Appendix H will be analyzed in the FEIS in Chapters X and X. Site assessments and NEPA review will be conducted for specific projects and are out of scope for this planning level document. Appendix H, Greater Sage-Grouse Wildland Fire and Invasive Species Assessment, describes a minimal framework example and suggested approach for this assessment.

As stated in Section X.X of the DRMPA/DEIS, the BLM works cooperatively with other federal, state, and county agencies as well as private landowners to prevent and control the spread of noxious weeds. There are currently no cooperative weed agreements with ranchers in the Oregon GRSG sub-region. [BLM note: BLM to make sure Ch 3 describes the cooperative weed management areas between BLM and counties]

BLM will review available literature. the suggested literature and incorporate as needed into the FEIS.

~~The CEQ regulations require an environmental impact statement to "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The description shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues" (40 CFR 1502.15). Additionally, the Utah Greater Sage-Grouse LUPA is a programmatic NEPA effort to conserve greater sage-grouse and its habitat across a broad geographic area. As such, the BLM and the Forest Service described the current conditions and trends in the affected environment broadly, across a range of conditions, appropriate to program-level land use planning actions.~~

~~As specific actions come under consideration, the BLM and the Forest Service will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. Site-specific concerns and more detailed environmental descriptions will be addressed when project-level reviews are tiered to the analysis in this EIS (40 CFR 1502.20, 40 CFR 1508.28). In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for any site-specific actions.~~

The BLM's cumulative effects analysis has met the requirements set out by the CEQ regulations for adequacy and appropriate scope (see Section 4.6, Cumulative Effects for details on requirements).

The DEIS adequately described baseline conditions for cheatgrass infestations in the planning area; Section 3.2 describes cheatgrass infestations by GRSG populations while Section 3.7.1 (Invasives) describes the baseline invasive vegetation conditions in the planning area.

As stated in Section 3.7.1 of the DLUPA/DEIS, the BLM and Forest Service work cooperatively with other federal, state, and county agencies as well as private landowners to prevent and control the spread of noxious weeds.

As noted above in the response in Section 4.3, Range of Alternatives, Section 1.5 of the Draft EIS describes how the Utah GRSG LUPA/EIS planning team employed the BLM and Forest Service planning process to develop a reasonable range of alternatives for the LUPA. The BLM and Forest Service complied with NEPA and the CEQ implementing regulations at 40

The prerequisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decision. The baseline data provided in chapter 3 in the Draft LUPA/EIS is sufficient to support, at the general land use planning-level of analysis, the environmental impact analysis resulting from management actions presented in the Draft LUPA/EIS. Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions.

The BLM used the most recent and best information available that was relevant to a land use planning-scale of analysis. During preparation of the LUPA/EIS, the BLM consulted with and used data from other agencies and sources, including but not limited to U.S. Geological Survey, Idaho state agencies, and the U.S. Fish and Wildlife Service. The BLM consulted on the analysis and the incorporation of available data into the LUPA/EIS with its cooperating agencies and other agencies with jurisdiction or expertise.

Analysis of proposed weed treatment methods tiers off of analysis in the Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS) [BLM 2007x] Potential occurrence of cheatgrass has been modeled (section 3.3.5). Acre of cheatgrass potential in GRSG habitat are shown  
n/a

n/a

[NOTE TO BLM: provide a response to request for description of integrated vegetation management.]

As noted previously in Section 7.3 of this Report, all alternatives considered within this planning process are consistent with conservation measures and objectives outlined in the COT Report and follow the basic principles of: (1) avoiding the impact of an activity; (2) minimizing impacts by limiting the degree of activity; and (3) mitigating for an impact by improving or enhancing greater sage-grouse habitat. As stated in Table 2-4, Description of Alternatives A, B, C, and D, in the DRMPA/DEIS, all of the alternatives would include implementing integrated vegetation management to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2.

The DRMPA/DEIS provides an adequate discussion of the environmental consequences, including the cumulative impacts, of the presented alternatives. As required by 40 CFR 1502.16, the DRMPA/DEIS provides a discussion of the environmental impacts of the alternatives including the proposed action, any adverse environmental effects that cannot be avoided should the alternatives be implemented, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and any irreversible or irretrievable commitments of resources that would be involved in the proposal should it be implemented. The DRMPA/DEIS provided sufficiently detailed information to aid in determining whether to proceed with the preferred alternative or make a reasoned choice among the other alternatives in a manner such that the public could have an understanding of the environmental consequences associated with the alternatives, in accordance with 40 CFR 1502.1.

Land use plan-level analyses are typically broad and qualitative rather than quantitative or focused on site-specific actions (BLM Land Use Planning Handbook H-1601-1). The DRMPA/DEIS contains only planning actions and does not include any implementation actions. A more quantified or detailed and specific analysis would be required only if the scope of the decision included implementation actions. As specific actions that may affect the area come under consideration, the BLM will conduct subsequent NEPA analyses that include site-specific project and implementation-level actions. The site-specific analyses will tier to the plan-level analysis and expand the environmental analysis when more specific information is known. In addition, as required by NEPA, the public will be offered the opportunity to participate in the NEPA process for implementation actions.

n/a

see text edits

use the cross reference to the national response for cums analysis requirements.





Sounds like the response is answering a different issue than what is provided in the issue statement. Double check the issue statement with comments, and determine if the issue needs to be modified or the response modified.

**From:** Lyons, James  
**Sent:** Monday, April 13, 2015 9:24 AM  
**To:** Carman, Stephanie  
**Cc:** Sarah Greenberger; James Lyons; Steven Ellis; Edwin Roberson; Bret Birdsong  
**Subject:** Re: Maps requested by Idaho Department of Fish and Game

Since Virgil, Dustin, and Tom are coming into town on Wednesday, it would be good to know what reaction Jeff got from Virgil on the maps.

This will certainly be part of the discussion on Wed.

jim

On Mon, Apr 13, 2015 at 11:41 AM, Carman, Stephanie <[scarman@blm.gov](mailto:scarman@blm.gov)> wrote:

Heads up - these maps were provided to Virgil and IDFG today.

**Stephanie Carman**  
Bureau of Land Management  
Sage-Grouse Project Coordinator  
office 202-208-3408  
mobile 202-380-7421  
[scarman@blm.gov](mailto:scarman@blm.gov)

----- Forwarded message -----

**From:** Foss, Jeffery <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Date:** Mon, Apr 13, 2015 at 11:36 AM  
**Subject:** Re: Maps requested by Idaho Department of Fish and Game  
**To:** "Kemner,Don" <[don.kemner@idfg.idaho.gov](mailto:don.kemner@idfg.idaho.gov)>, Virgil Moore <[virgil.moore@idfg.idaho.gov](mailto:virgil.moore@idfg.idaho.gov)>  
**Cc:** "Beck, Jonathan" <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Kurt Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>

Virgil and Don  
Let us know if the maps and info meet your needs.  
Thanks  
Jeff

**Jeff Foss**  
**Acting State Director-Idaho BLM**  
1387 S. Vinnell Way, Boise, ID 83709  
208-373-3800 or 373-4001

[jfoss@blm.gov](mailto:jfoss@blm.gov)

On Mon, Apr 13, 2015 at 8:59 AM, Kemner,Don <[don.kemner@idfg.idaho.gov](mailto:don.kemner@idfg.idaho.gov)> wrote:

Thanks Jon. I will go over the maps with Virgil at 11:00. I will contact you if there are questions.

Don

**From:** Beck, Jonathan [mailto:[jmbeck@blm.gov](mailto:jmbeck@blm.gov)]  
**Sent:** Monday, April 13, 2015 8:41 AM  
**To:** Kemner,Don; Jeffery Foss  
**Cc:** Kurt Wiedenmann; Johanna Munson; Stephanie Carman  
**Subject:** Maps requested by Idaho Department of Fish and Game

Don, please see the attached maps of GRSG leks in and outside of SFAs. One map depicts leks and the second is a zoom in on the Craters Area that depicts leks in SFAs outside of PHMA. Jon

--

Jonathan Beck

Bureau of Land Management

Idaho State Office

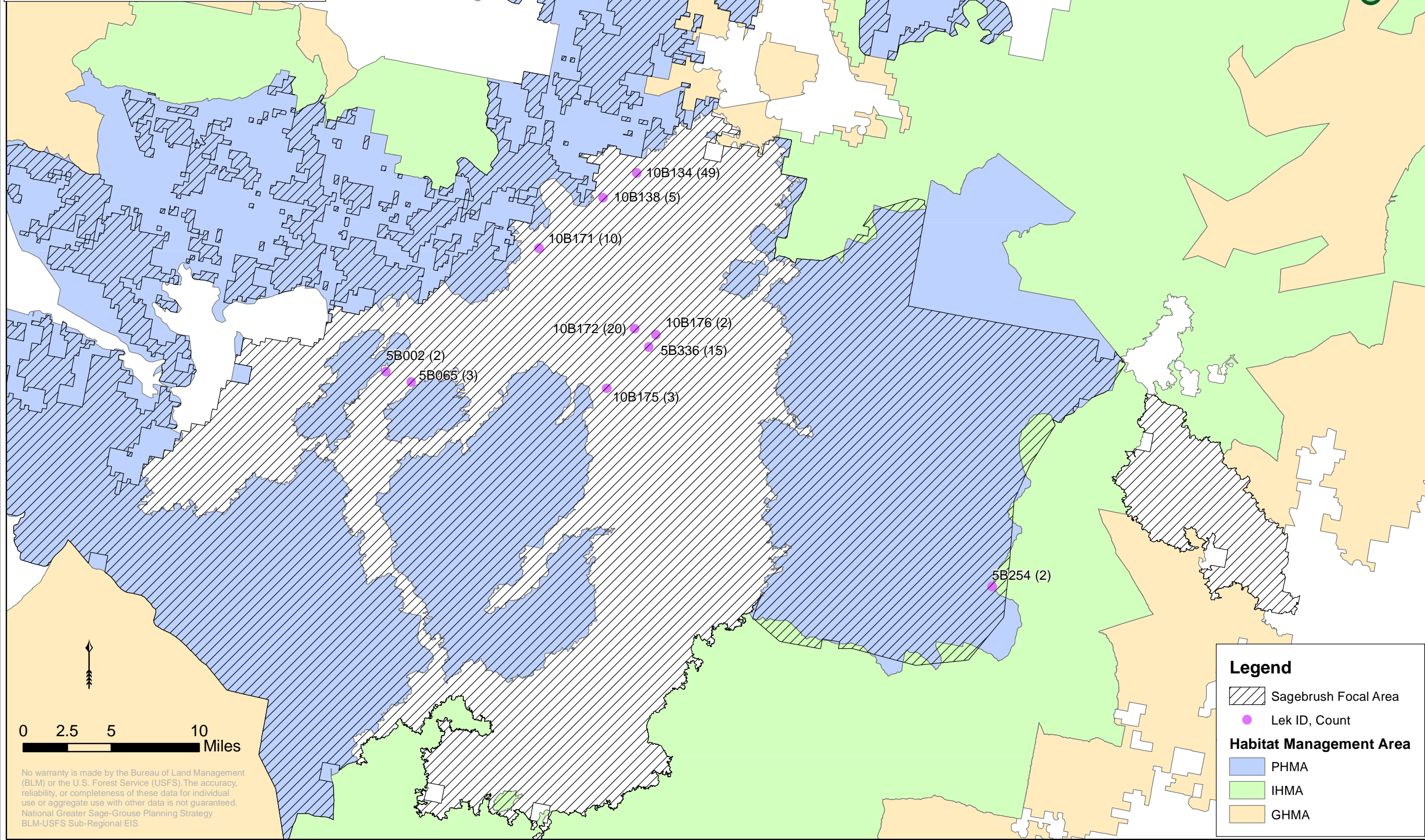
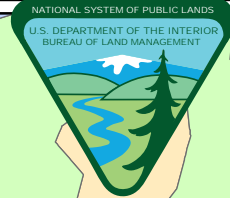
208-373-4070

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***Jim Lyons***  
***Deputy Assistant Secretary***  
***Land and Minerals Management***

**[Jim\\_Lyons@ios.doi.gov](mailto:Jim_Lyons@ios.doi.gov)**  
**202-208-4318 (direct)**  
**202-815-4412 (mobile)**

**Leks in SFA / Non PHMA  
Max Male Count 2010-2014  
Craters of the Moon NM**



0 2.5 5 10 Miles

No warranty is made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS). The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.  
National Greater Sage-Grouse Planning Strategy  
BLM-USFS Sub-Regional EIS

**Legend**

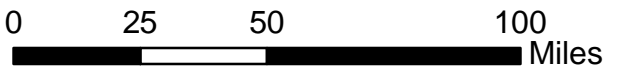
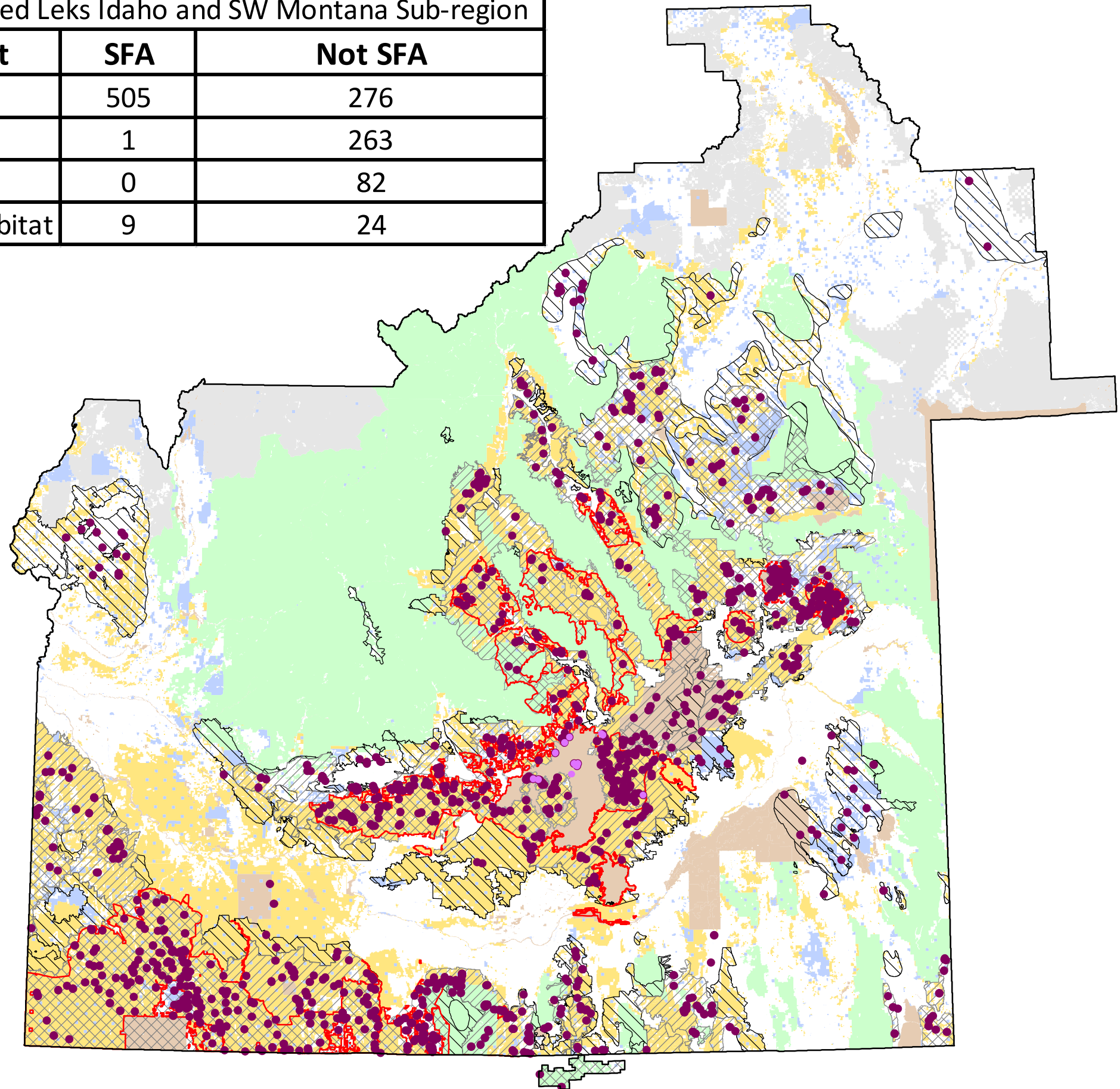
- Sagebrush Focal Area
- Lek ID, Count

**Habitat Management Area**

- PHMA
- IHMA
- GHMA



Occupied Leks Idaho and SW Montana Sub-region		
Habitat	SFA	Not SFA
PHMA	505	276
IHMA	1	263
GHMA	0	82
Non Habitat	9	24



**Legend**

- Leks in SFA/ non PHMA
- Occupied Lek
- Sagebrush Focal Area
- Habitat Management Area**
- PHMA
- IHMA
- GHMA
- MGT Agency**
- Bureau of Land Management
- United States Forest Service
- Private
- State
- Other
- USFS Not Analyzed
- Idaho and SW Montana Sub-regional boundary

No warranty is made by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS). The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.  
 National Greater Sage-Grouse Planning Strategy  
 BLM-USFS Sub-Regional EIS



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# CAMAS CONSERVATION DISTRICT

P. O. Box 156 Fairfield, ID 83327 (208)764-3223 [www.camasscd.org](http://www.camasscd.org) 403 Soldier Road [camasscd@yahoo.com](mailto:camasscd@yahoo.com)

---

July 17, 2014

Tim Murphy

Idaho State Director (Acting)

Bureau of Land Management

1387 South Vinnell Way

Boise, Idaho 83709

Brent Ralston, NW District Manager

Bureau of Land Management

1387 South Vinnell Way

Boise, Idaho 83709

RE: Camas County Rangeland Management Plan

Dear Mr. Murphy and Mr. Ralston,

On July 14, 2014 the Camas County Board of Commissioners adopted by resolution the Camas County Rangeland Management Plan. The development of this Plans is to provide the format to guide all plans, policies, conservation measures and best management practices for the Greater Sage Grouse in Camas County. The Camas Conservation District was asked to assist in developing this plan.

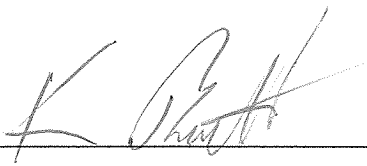


“The purpose of the Plan is to provide private and public land owners with land management principles, policies, incentives and best management practices, based on the best available science, that are tailored to fit Camas County’s unique landscape and habitat characteristics for the betterment of the species.”

The plan has been developed with considerable time and effort invested. We are incorporating resource inventory, mapping and logistics to ensure the habitat is well defined and we are working with NRCS to identify and incorporate BMP’s specifically suited to this area. By this letter, we specifically are notifying you that we have the Plan completed and are submitting it to you for incorporation within you Sage Grouse Environmental Impact Statement and for the integration of conservation measures from this Plan into your Resource Managements Plans as they apply in Camas County. A copy of the Camas County Rangeland Management Plan has been sent electronically to you at [tmurphy@blm.gov](mailto:tmurphy@blm.gov) and [bralston@blm.gov](mailto:bralston@blm.gov), respectively.

We are available to answer questions you may have about our Plan or its development and are providing you a copy. Following your review of the final product we can assist you with the incorporation of the Plan data into your NEPA analysis. We look forward to future Coordination meetings where we may discuss in greater detail the provisions of the Plan once you have had an opportunity to thoroughly review the contents.

Respectfully,



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Ken Backstrom, Chairman  
Camas County Commissioners




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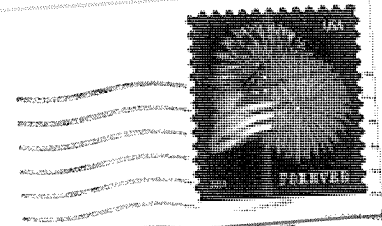
Bill Davis, Chairman  
Camas Conservation District

Enclosure by Electronic Transmission:

Camas County Rangeland Management Plan

  
Camas Conservation District  
403 Soldier Road  
P. O. Box 156  
Fairfield, ID 83327  
(208)764-3223

ct



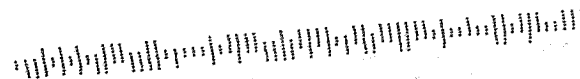
Brent Ralston  
NW District Manager  
Bureau of Land Management  
1387 South Vinnell Way  
Boise, ID 83709

RECEIVED

AUG - 6 2014

9:00 A.M.

83709\$1657 CD91





The Office of the Governor

Executive Department  
State of Idaho

EXECUTIVE DEPARTMENT  
STATE OF IDAHO  
BOISE

State Capitol  
Boise

**EXECUTIVE ORDER NO. 2015-04**

**ADOPTING IDAHO'S SAGE-GROUSE MANAGEMENT PLAN**

WHEREAS, in December 2011, the U.S. Department of the Interior invited the eleven (11) western states impacted by a potential Endangered Species Act (ESA) listing of the greater sage-grouse to develop state-specific conservation plans that would conserve the species and its habitat while maintaining predictable levels of land use; and

WHEREAS, Governor Otter accepted the federal government's invitation, and by and through Executive Order 2012-02 established the Governor's Sage-grouse Task Force (Task Force) to collaboratively develop science-based recommendations for inclusion in Idaho's sage-grouse conservation plans; and

WHEREAS, in September 2012, and based on recommendations from the Task Force, I submitted the Federal Alternative of Governor C.L. "Butch" Otter for Greater Sage-grouse Management in Idaho (Governor's Alternative) as an alternative for inclusion in the National Greater Sage-grouse Land Use Planning Strategy. This national planning strategy amends some 68 U.S. Bureau of Land Management (BLM) planning units and 20 U.S. Forest Service (USFS) National Forest Plans by including objectives, habitat conditions and management actions for sage-grouse; and

WHEREAS, in February 2013, the U.S. Fish and Wildlife Service (FWS) published the Greater Sage-Grouse Conservation Objectives Team Final Report (COT Report). The purpose of the COT Report, which was developed in conjunction with state wildlife agencies, was to establish the ESA goals by identifying Primary Areas of Conservation (PAC) and the threats to the species throughout its range, as well as to develop conservation measures, based on the best available science, to address those threats. The COT Report provides the flexibility to create solutions that meet the needs of greater sage-grouse and the local ecological and socioeconomic conditions; and

WHEREAS, Governor Otter requested the FWS to evaluate the Governor's Alternative for consistency under the COT Report, and in April 2013, the FWS concluded that the foundational elements, and some individual components, within the Governor's Alternative were consistent with the COT Report. (App. 2); and

WHEREAS, based on the strength of FWS's recommendation, the BLM and USFS selected the Governor's Alternative as a co-preferred alternative within Idaho's portion of the national planning strategy (see Alternative E in the Idaho and Southwestern Montana Greater Sage-Grouse Draft Land Use Plan Amendments and Draft Environmental Impact Statement, 78 Fed. Reg. 65,703 (Nov. 1, 2013)); and

WHEREAS, the State has continued refining individual components of the Governor's Alternative, including but not limited to: (1) Idaho Code § 38-104B developing rangeland fire protection associations; (2) the State Board of Land Commissioners on April 21, 2015, adopting the Land Board's Greater Sage-grouse Conservation Plan (Land Board Plan) for State endowment lands complementary to the Governor's Alternative (App. 3); (3) the State Oil and Gas Conservation Commission on April 23, 2015, adopting portions of the Land Board Plan applicable to oil and gas programs (App. 3, p. 38); (4) working collaboratively with the local federal agencies' representatives and Task Force members to better clarify the Governor's Alternative; and (5) increasing state funding for enhanced lek monitoring, habitat restoration projects, and wildfire suppression; and

WHEREAS, it is vital to the interests of the State to continue these efforts as the listing of the species and/or overly restrictive federal land-use plan amendments would adversely impact Idaho's sovereign interest in managing its wildlife pursuant to Idaho Code § 36-103 and § 68-818, its customs, culture and way of life, and the State's ability to generate revenues from private property and endowment lands;

NOW, THEREFORE, I, C.L. "BUTCH" OTTER, Governor of the State of Idaho, by the authority vested in me under the Constitution and laws of the State of Idaho do hereby order the following:

That all executive agencies, to the extent consistent with existing state law, for relevant permits and policies, adopt the Governor's Alternative and all supporting documentation, incorporated in its entirety into this Executive Order by this reference, hereinafter known as "Idaho's Sage-grouse Management Plan," which includes:

**I. Application of the foundational elements of Idaho's Sage-grouse Management Plan (Idaho's Plan) to all landownerships.** These foundational elements are consistent with the COT Report and apply across all land ownerships.

- a. **Habitat Zones** – Idaho's Plan includes three distinct management zones: Core Habitat Zone (CHZ), Important Habitat Zone (IHZ), and General Habitat Zone (GHZ). The COT Report identified the most important habitat areas for maintaining sage-grouse representation, redundancy, and resiliency across the landscape. These areas (or PACs) closely align with CHZ and IHZ. The three management zones within the Sage-grouse Management Area (SGMA) represent a management continuum that includes, at one end, a relatively restrictive approach aimed at providing a high level of protection to the species within the CHZ, and on the other end, a relatively flexible approach for the GHZ allowing for more multiple-use activities. The zones are reflected in the attached map. (App. 1, p. 24).
  - i. **Core Habitat Zone (CHZ)** – The CHZ includes approximately sixty-five percent (65%) of the known active leks and is occupied by approximately seventy-three percent (73%) of sage-grouse males. CHZ supports the highest breeding densities of sage-grouse in Idaho, and maintenance of these populations ensures that Idaho has a viable and robust population of sage-grouse. Management in CHZ is the most restrictive to protect what local data shows as the "best of the best" habitat.
  - ii. **Important Habitat Zone (IHZ)** – The IHZ includes approximately twenty-five percent (25%) of the known active leks and is occupied by approximately twenty-two percent (22%) of sage-grouse males.
  - iii. **General Habitat Zone (GHZ)** – This management zone includes five percent (5%) of sage-grouse males, and generally includes few active leks and fragmented or marginal habitat.
- b. **Population Objectives** – In conjunction with the habitat zones, these population goals: (1) measure the efficacy of the State plan; and (2) ensure that there is an appropriately tailored response to significant fluctuations in habitat and populations.
  - i. **Objective 1** – Implement regulatory mechanisms that maintain and enhance sage-grouse habitats, populations, and connectivity within CHZ. Recognizing the impact of wildfire, the IHZ provides important management flexibility and a strategic conservation buffer.
  - ii. **Objective 2** – Stabilize sage-grouse habitats and populations by monitoring the effectiveness of the regulatory measures over time. A primary objective is to minimize habitat lost within CHZ, and to a lesser extent, IHZ.
- c. **Conservation Areas** – Idaho's Plan divided the SGMA into four Conservation Areas (CA) across the state: the Mountain Valleys, Desert, West Owyhee, and Southern. Each CA is divided into Core, Important, and General management zones. (App. 1, p. 8).
- d. **Adaptive Regulatory Triggers** – Given the unpredictability of wildfire, these triggers provide a regulatory backstop to manage loss within a CA. An adaptive trigger is

*employed when dramatic shifts in the population or habitat occurs based on an average over a three year period compared to the 2011 baseline.*

- i. *The adaptive triggers are based on the severity of habitat or population loss (i.e. a “soft trigger” or a “hard trigger”). (App. 1, pp. 11, 69-71).*
  - ii. *When monitoring information indicates that a soft trigger may be tripped, the Implementation Commission<sup>1</sup> – aided by technical expertise from Idaho Department of Fish and Game and other relevant State agencies – will assess the factor(s) leading to the decline and recommend potential management actions. (App. 1, p. 69).*
  - iii. *If the hard trigger becomes operative, management changes no longer are discretionary and will be implemented by the Implementation Task Force.*
- e. ***Rangeland Fire Protection Associations (RFPA)*** – *RPAs act as a regulatory mechanism across all landownerships ensuring quicker initial attack on wildfires in the CHZ and IHZ through the deployment of additional trained firefighters and resources located in rural parts of the SGMA.*
- i. *Idaho Code § 38-104B provides for the creation and funding of RPAs in Idaho.*
  - ii. *RFPA members work collaboratively with federal land management agencies and Idaho Department of Lands (IDL) to protect more than 2.9 million acres of federal and state rangeland and 675,000 acres of private land. These numbers are expected to grow as additional RPAs become operational in the near future.*
  - iii. *The success and effectiveness of RPAs in Idaho is considered a model by other western states.*

## **II. *Applicability of Idaho’s Plan to Lands Managed by the Federal Government (as more fully described in Alternative E of the Draft Environmental Impact Statement)***<sup>2</sup>

- a. ***Fire*** – *Idaho’s Plan for wildfire on federal lands focuses efforts on prevention, suppression, and restoration. The objective within Idaho’s Plan is to implement actions necessary to manage fire within the normal range of fire activity and maintain and restore healthy, native sage-steppe plant communities within CHZ and IHZ.*
- b. ***Invasive species*** – *In addition to the wildfire restoration efforts, Idaho’s Plan calls for the aggressive management of exotic undesirable plant species within the CHZ and IHZ.*
- c. ***Infrastructure*** – *Infrastructure means discrete, large-scale anthropogenic features, including but not limited to, highways, high voltage transmission lines, commercial wind projects, energy development (e.g. oil and gas development, geothermal wells), airports, mines, cell phone towers, landfills, residential and commercial subdivisions. (App. 1, p. 32).*
  - i. *Permitted activities in specific habitat designations*

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<sup>1</sup> Should the BLM and USFS adopt the Governor’s Alternative, or an alternative consistent with the Governor’s Alternative, for incorporation into relevant Land and Resource Management Plans, the Governor shall execute a companion Executive Order establishing an Implementation Task Force as outlined in Appendix 1, pages 21, 67–71.

<sup>2</sup> Governor Otter encourages the adoption of Alternative E in the final EIS as it is consistent with the laws, programs, and policies of the State of Idaho. However, the Governor recognizes that the BLM and USFS may adopt a different alternative (or revised alternative) in the record of decision (ROD) and such action may necessitate a revision to this Executive Order.

- ii. *Infrastructure in CHZ – Infrastructure development in areas designated as CHZ is prohibited, except if conducted pursuant to a valid existing right, incremental upgrade and/or capacity increase of existing development, or if a project-level exemption is obtainable by meeting the criteria outlined in Appendix 1, including compensatory mitigation. (App. 1, pp. 35-36).*
  - 1. *Infrastructure in IHZ – Infrastructure development in areas designated as IHZ is permissible subject to meeting the criteria specified within Idaho’s Plan and approved by the BLM State Director. (App. 1, p. 42)*
- iii. *Best Management Practices (BMPs) for proposed infrastructure development within CHZ and IHZ.*
  - 1. *Infrastructure development should reflect unique localized conditions including soils, vegetation, development type, predation, climate, and other local realities and should utilize best management practices as described in Idaho’s Plan. (App. 1, pp. 43-45).*
  - 2. *A lek buffer of 1 km (0.6 miles) from occupied leks will be applied to essential public services, including but not limited to distribution lines, domestic water lines, and gas lines. This will enable development in a manner that maintains populations, habitats, and essential migration routes where possible. (App. 1, pp. 43-45).*
  - 3. *No Surface Occupancy (NSO) within 1 km of an occupied lek will be applied to oil and gas development. (App. 1, pp. 46-47)*
- d. *Nothing in Idaho’s Plan shall revoke, suspend, or modify any project or activity decision made prior to the effective date of the ROD.*
- e. ***Improper livestock grazing (secondary threat)*** –*This section of Idaho’s Plan requires that the Idaho Rangeland Health Standards (IRHS) be met and is consistent with the COT report. While no studies exist directly relating livestock grazing systems or stocking rates to sage-grouse abundance or productivity, Idaho’s Plan addresses improper livestock grazing within CHZ and IHZ through adaptive management according to the following process:*
  - i. *Sage-grouse habitat characteristics will be incorporated into relevant Resource Management Plans as desired conditions, recognizing that these desired conditions may not be achievable due to the existing ecological condition of an allotment, the ecological potential of the area, or causal events unrelated to livestock grazing. (App. 1, pp. 14-20).*
  - ii. *Based on these habitat characteristics, habitat assessments will be conducted to help inform grazing management in conjunction with scheduled term grazing permit renewals or if an adaptive regulatory trigger has been tripped. (App. 1, p. 73-75).*
  - iii. *In conjunction with scheduled term grazing permit renewals, livestock grazing will be assessed through the IRHS (primarily Standards 2, 4, and 8), as informed by the COT Report with respect to sage-grouse. (see Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (1997)).*
    - 1. *Assuming no adaptive regulatory trigger has been tripped, there is a rebuttable presumption that current grazing systems within a particular CA are adequate to maintain viable sage-grouse populations.*

2. *This does not preclude adaptive changes to grazing permits based on the other standards contained in the IRHS.*
- iv. *If an adaptive regulatory trigger has been tripped within a CA, and after a more thorough analysis of those allotments within a relevant CA determines that improper livestock grazing is a potential limiting factor, modifications to permits will be determined based on ecological site potential and will be selected from the suite of management options outlined in Idaho's Plan. (App. 1, pp. 48-50).*

**III. Applicability of Idaho's Plan on State and private lands**

- a. *In April 2015, the State Board of Land Commissioners and the Idaho Oil and Gas Conservation Commission contingently approved the Land Board Plan. (App. 3). The Land Board Plan, consistent with the constitutional mandate (IDAHO CONST. ART. IX, § 8), includes enforceable regulatory stipulations for inclusion into certain leases, permits, and easements on State endowment lands. Adoption and implementation of the Land Board Plan is contingent upon the incorporation of Idaho's Plan into the federal land-use plan amendments for sage-grouse.*
- b. *Certain permit holders on private lands can voluntarily agree to add BMPs into their permit, which would then become binding. However, private land comprises less than twenty percent (20%) of sage-grouse habitat in Idaho (and less than 6% of the CHZ).*
- c. *Existing land uses and landowner activities are vital to the State of Idaho. Idaho's Plan recognizes changes in sage-grouse populations and habitats on private lands could influence land management on public lands as adaptive triggers can become operative within a CA regardless of landownership. To offset any impacts, SGMAs have been designed to provide flexibility in order to allow for the continuation of land uses and valid existing rights. In addition, Idaho continues to encourage voluntary conservation efforts on private land for the conservation of sage-grouse.*



*IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the Great Seal of the State of Idaho at the Capitol in Boise on this 27<sup>th</sup> day of May, in the year of our Lord two thousand and fifteen, and of the independence of the United States of America the two hundred thirty-ninth and of the Statehood of Idaho the one hundred twenty-fifth.*

C.L. "BUTCH" OTTER  
GOVERNOR

LAWRENCE DENNEY  
SECRETARY OF STATE

In reply refer to:  
1610-5.G.1.4 (L00000)

IDMT\_PUB\_10760  
2.6

May 29, 2015

The Honorable John Hickenlooper  
Governor of Colorado  
136 State Capitol Bldg  
Denver, CO 80203

Dear Governor Hickenlooper:

The Bureau of Land Management (BLM) Northwest District Office has developed the Northwest Colorado Greater Sage-Grouse Proposed Land Use Plan Amendment/Final Environmental Impact Statement (Proposed LUP Amendment/Final EIS). The Proposed LUP Amendment/Final EIS is enclosed for your review.

The purpose of the Proposed LUP Amendment/Final EIS is to identify and incorporate appropriate Greater Sage-Grouse conservation measures into existing LUPs to help conserve, enhance, and/or restore Greater Sage-Grouse habitat by reducing, eliminating, or minimizing threats to that habitat. The need for this LUPA is to establish regulatory mechanisms in BLM LUPs to respond to the recent “warranted, but precluded” ESA listing petition decision from the US Fish and Wildlife Service (75 Federal Register 13910, March 23, 2010). In its finding on the petition to list the Greater Sage-Grouse, US Fish and Wildlife Service identified adequacy of regulatory mechanisms as a major threat. The US Fish and Wildlife Service also identified the principal regulatory mechanism for the BLM is conservation measures embedded in LUPs.

BLM Planning regulations in 43 CFR 1610.3-2(e) provide a state Governor 60 days to identify inconsistencies with approved state or local plans, policies, or programs and to provide written recommendations to the BLM State Director. If the BLM State Director does not accept the Governor's recommendations on plan consistency, the Governor may appeal to the BLM Director.

If no response is received by July 29, 2015, the BLM will assume the Proposed RMP/Final EIS is consistent with the State of Colorado's approved plans, policies, and programs.

If you or your staff has any questions about the Northwest Colorado Greater Sage-Grouse Proposed LUP Amendment/Final EIS or the Governor's Consistency Review process, please contact Erin Jones at (907) 244-3008.

Sincerely,

Ruth Welch  
State Director





C.L. "BUTCH" OTTER  
GOVERNOR

May 1, 2015

Dan Ashe, Director  
U.S. Fish and Wildlife Service  
U.S. Department of the Interior  
1849 C Street NW, Room 3331  
Washington, D.C. 20240-0001

Dear Dan,

The state of Idaho (State) reinforced its strategy to conserve greater sage-grouse (GRSG) and its habitat last month with the approval of additional conservation measures on State endowment trust lands and activities that fall under Idaho Department of Lands (IDL) regulatory and fire-related authorities.

The Idaho State Board of Land Commissioners (Land Board) approved the GRSG Conservation Plan (Land Board's Plan) on April 21, 2015. The Idaho Oil and Gas Conservation Commission (Commission) approved the Land Board's Plan on April 23, 2015. Included with this correspondence is a copy of the Land Board's Plan for your review.

The Land Board's Plan was developed with input from natural resource industry user groups, environmental organizations and relevant State and federal agencies. It is important to point out, however, that the implementation of the Land Board's Plan is contingent upon the incorporation of the foundational elements of the federal alternative (which is my plan) into the relevant Resource Management Plans (RMPs) in Idaho.

In addition to a landscape conservation approach for GRSG within the Land Board's Plan, the State of Idaho has backed up its commitment to GRSG conservation with a legislative appropriation of \$750,000 for additional conservation activities in Idaho. Some of this funding will be applied to projects on State endowment lands.

The State of Idaho has been proactive and collaborative in our efforts to conserve GRSG and its habitat in Idaho while maintaining working landscapes and the economic vitality of the State. These efforts demonstrate Idaho's commitment to the conservation of this iconic western species.

As always – Idaho, "Esto Perpetua"

A handwritten signature in black ink that reads "C.L. Butch Otter".

C.L. "Butch" Otter  
Governor of Idaho

**Brent Ralston**

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**From:** Murphy, Timothy  
**Sent:** Tuesday, June 03, 2014 4:47 PM  
**To:** Steven A Ellis; Edwin Roberson; Jeffery Foss; Brent Ralston; Kurt Wiedenmann  
**Subject:** Fwd: Otter Memo  
**Attachments:** 6 9 14\_1030am\_Meeting with Governor Otter.docx; 6 9 14\_1030am\_Meeting with Governor Otter v1840 ET.docx

The attached version 1800 hrs ET covers the sage grouse piece only. The Gateway piece will follow.

----- Forwarded message -----

From: **Ellis, Steven** <[sellis@blm.gov](mailto:sellis@blm.gov)>  
Date: Tue, Jun 3, 2014 at 3:37 PM  
Subject: Fwd: Otter Memo  
To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>

----- Forwarded message -----

From: **Greenberger, Sarah** <[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)>  
Date: Tue, Jun 3, 2014 at 5:11 PM  
Subject: Otter Memo  
To: Steven Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>  
Cc: Zaina Javaid <[zaina\\_javid@ios.doi.gov](mailto:zaina_javid@ios.doi.gov)>

Steve - attached is an outline for an event memo for the Otter meeting. I tried to make the GSG section match our conversation, but please review! For the Gateway section, can your team fill in Otter's expected concern and a suggested response? I am copying Zaina who is working on this for the briefing book. Thanks!

--  
Timothy M Murphy  
acting Idaho State Director  
(Assistant Director  
Bureau of Land Management  
Fire and Aviation Directorate  
National Interagency Fire Center)  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270

**BRIEFING MEMORANDUM FOR THE SECRETARY**

**MEETING WITH GOVERNOR OTTER**

DATE: June 9, 2014  
LOCATION: The Broadmoor Hotel, Colorado Springs, CO  
TIME: 10:30AM – 11:00AM  
FROM: Francisco Carrillo, Deputy Director of Intergovernmental Affairs, (202) 412-8846

**I. PURPOSE**

You are meeting with Idaho Governor Butch Otter prior to the WGA annual meeting. Gov. Otter would like to discuss Sage Grouse issues, particularly the impact that the National Policy Team guidance will have on the Idaho alternative. He would also like to discuss the Gateway West Transmission Line.

**II. PARTICIPANTS**

- Gov. Butch Otter (ID)
- Deputy Secretary Mike Connor

**III. HOT TOPICS**

**Gateway West Transmission Line (Idaho segments 8 & 9) \* Priority Project of Rapid Response Team for Transmission (RRTT)**

Next Milestone: Resource Advisory Council meeting June 5, 2014 (to be followed by BLM ROD based on existing FEIS or NOI initiating supplemental EIS)

Project Description: Sponsored by Idaho Power and Rocky Mountain Power, the Gateway West Transmission Project consists of nine 500 kV AC segments and one 230 kV AC segment spanning 990 miles across southern Wyoming and southern Idaho. The project will address load growth in Idaho, Oregon, Utah, and Wyoming, improve the reliability and efficiency of utility systems, and tap renewable energy resources in Idaho and Wyoming. A Record of Decision for project segments 1-7 and 10 was issued November 2013. BLM deferred a decision on segments 8 and 9 in Idaho to allow additional time to address unresolved siting challenges. BLM is the lead federal agency. The project sponsors estimate 1,100 to 1,200 jobs to be created.

Project Challenges:

- Routes proposed across the BLM administered Morley Nelson Snake River Birds of Prey NCA in southern Idaho
- Finalizing Greater Sage Grouse mitigation
- Finalizing Migratory Bird Conservation Plan

Gov Otter’s Concern:

12/1/2015 1:22 PM

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Comment [GSD1]: What does this mean in concrete terms?

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Suggested Response:

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### Sage Grouse

The Final Idaho State Plan was completed and incorporated as Alternative E into the Draft EIS. The State Plan only applies to Federal lands with the exception of the creation of the Rural Fire Protection Associations, which are currently being implemented and funded by the State. BLM has been working collectively with the State of Idaho and FWS to develop a 'Proposed Final Plan' that incorporates the State Plan, including additional changes the State wanted to include into their state strategy (e.g., Core Management Areas and Important Management Areas). These components have been agreed to and developed in collaboration with the State. All of the players (State, BLM, FS and FWS) look at these as components of the State plan although the State Plan has never been formally modified to include them.

The National Policy Team recently issued range-wide guidance that takes a different approach to management than the agreed to approach in the "Proposed Final Plan". That guidance set out an exception process for state directors to explain why an alternative approach is warranted. The Idaho BLM State Director has submitted information to the BLM Washington Office explaining why the Idaho approach achieves similar or better outcomes for Sage Grouse. That memo is under review.

Governor Otter's Concern: The Governor's office is especially concerned with the manner in which the general National Policy Team guidance requires General Habitat (versus Priority Habitat) be managed. In addition, Idaho has three tiers of lands (priority, important, and general habitat) and not two like other states.

Suggested Response:

- Governor Otter, I know that your team has worked very hard with ours to come up with a strong approach to sage grouse management in Idaho.
- The National Policy Team guidance was only guidance and invited State Directors to explain why alternative approaches can work given the specific facts at play in different states.
- We believe we need this step to ensure a strong record that supports deviation from the standards set out in the NTT and COT reports.
- My understanding is that the ID BLM director is working with our Washington Office on that record. The door is not shut to the Idaho approach and we look forward to continuing to work with you.

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12/1/2015 1:22 PM

**BRIEFING MEMORANDUM FOR THE SECRETARY**

**MEETING WITH GOVERNOR OTTER**

DATE: June 9, 2014  
LOCATION: The Broadmoor Hotel, Colorado Springs, CO  
TIME: 10:30AM – 11:00AM  
FROM: Francisco Carrillo, Deputy Director of Intergovernmental Affairs, (202) 412-8846

**I. PURPOSE**

You are meeting with Idaho Governor Butch Otter prior to the WGA annual meeting. Gov. Otter would like to discuss Sage Grouse issues, particularly the impact that the National Policy Team guidance will have on the Idaho alternative. He would also like to discuss the Gateway West Transmission Line.

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Project Challenges:

- Routes proposed across the BLM administered Morley Nelson Snake River Birds of Prey NCA in southern Idaho
- Finalizing Greater Sage Grouse mitigation
- Finalizing Migratory Bird Conservation Plan

Gov Otter's Concern:

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Comment [GSD1]: What does this mean in concrete terms?

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- Suggested Response:

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#### IV. TALKING POINTS

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##### Sage Grouse

The Final Idaho State Plan was completed and incorporated as Alternative E into the Draft EIS. The State Plan currently only applies to Federal lands with the exception of the creation of the Rural Fire Protection Associations, which are currently being implemented and funded by the State. BLM has been working collectively with the State of Idaho and FWS to develop a 'Proposed Final Plan' that incorporates the State Plan, including additional changes the State wanted to include into their state strategy (e.g., Core Management Areas, and Important, and General Management ZonesAreas). These components have been agreed to and developed in collaboration with the State. All of the players (State, BLM, FS and FWS) look at these as components of the State plan although the State Plan has never been formally modified to include them.

The National Policy Team recently issued range-wide guidance that takes a different approach to management than the agreed to approach in the "Proposed Final Plan". That guidance set out an exception process for state directors to explain why an alternative approach is warranted. The Idaho BLM State Director has submitted information to the BLM Washington Office explaining why the Idaho approach achieves similar or better outcomes for Sage Grouse. That memo is under review.

Governor Otter's Concern: The Governor's office is especially concerned with the manner in which the general National Policy Team guidance requires General Habitat (versus Priority Habitat) be managed relative to the "no net unmitigated loss of sage grouse habitat." In addition, Idaho has three tiers of habitat and protections (priorityCore, Important, and General zoneshabitat) and not two like other states. Ninety five percent of breeding males are protected by the Core Zone (73% of breeding males) and Important Zone (22%), and the Important Zone is a fundamental component of the adaptive management strategy. This approach lays the foundation to potentially manage state and as appropriate, private lands, within this framework.

##### Suggested Response:

- Governor Otter, I know that your team has worked very hard with ours to come up with a strong approach to sage grouse management on public lands in Idaho.
- The National Policy Team guidance was only guidance not policy and invited State Directors to explain why alternative approaches can work given the specific facts at play in different states.
- We believe we need this step to ensure a strong record that supports similar or better outcomesdeviation from the standards set out in the NTT and COT reports.
- My understanding is that the ID BLM director is working with our Washington Office on that record. The door is not shut to the Idaho approach and we look forward to continuing to work with you.

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**Brent Ralston**

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**From:** Zwang, Cheryle  
**Sent:** Wednesday, June 04, 2014 8:47 AM  
**To:** Timothy Murphy  
**Cc:** Jeffery Foss; Peter Ditton; Jessica Gardetto; Kurt Wiedenmann; Brent Ralston  
**Subject:** Re: Timothy Murphy has shared a file with you on OneDrive

I saved this one; it did change enough that we need to use this one.

*Cheryle Cobell Zwang*

*Idaho Bureau of Land Management*

*Deputy State Director, Communications*

*Ph: 208/373-4016 | Fax: 208-373-4019 | Email: [czwang@blm.gov](mailto:czwang@blm.gov)*

*Follow BLM Idaho on Social Media*



On Wed, Jun 4, 2014 at 5:52 AM, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)> wrote:  
Call early this a.m. Resulted in the linked current version of briefing for Sec to use with Gov.  
Steve took this upstairs. A few new edits to Gateway, no change to the SG piece.

Tim  
To view Timothy Murphy's file, click this link:  
[briefing memo\\_Gov Otter 6.4.14 0715 ET.docx](#)

Sent from my iPad



## BRIEFING MEMORANDUM FOR THE SECRETARY

### MEETING WITH GOVERNOR OTTER

DATE: June 9, 2014  
LOCATION: The Broadmoor Hotel, Colorado Springs, CO  
TIME: 10:30AM – 11:00AM  
FROM: Francisco Carrillo, Deputy Director of Intergovernmental Affairs, (202) 412-8846

#### I. PURPOSE

You are meeting with Idaho Governor Butch Otter prior to the WGA annual meeting. Governor Otter would like to discuss Sage Grouse issues, particularly the impact that the National Policy Team guidance will have on the Idaho alternative. He would also like to discuss the Gateway West Transmission Line, particularly proposed segments 8 and 9.

#### II. PARTICIPANTS

- Governor Butch Otter (ID)
- Deputy Secretary Mike Connor

#### III. HOT TOPICS

##### **Gateway West Transmission Line (Idaho segments 8 & 9) \* Priority Project of Rapid Response Team for Transmission (RRT)**

Next Milestone: Boise District Resource Advisory Council (RAC) meeting June 5, 2014 (to be followed by BLM's re-initiation of public scoping and additional analysis under NEPA before a final decision is made).

Project Description: Proposed by Idaho Power and Rocky Mountain Power, the Gateway West Transmission Project consists of nine 500 kV AC segments and one 230 kV AC segment spanning 990 miles across southern Wyoming and southern Idaho. The project will address load growth in Idaho, Oregon, Utah, and Wyoming, improve the reliability and efficiency of utility systems, and tap renewable energy resources in Idaho and Wyoming. A Record of Decision for project segments 1-7 and 10 was issued November 2013. BLM deferred a decision on segments 8 and 9 in Idaho to allow additional time to address unresolved siting challenges centered primarily around the BLM's Snake River Birds of Prey National Conservation Area. The project sponsors estimate 1,100 to 1,200 jobs to be created.

##### Project Challenges for Segments 8 and 9

- Due to geographic constraints and existing military training ranges, all alternative routes cross at least a portion of the BLM administered Morley Nelson Snake River Birds of Prey NCA (NCA) in southern Idaho.
- To comply with the NCA's enabling legislation (PL 103-64) and BLM policies, the project must conserve, protect, and enhance the values for which the NCA was created.

- The BLM worked with the project proponents on a mitigation and enhancement strategy but this strategy was not submitted by the proponents in time to be included in the 2013 FEIS and the public has not had an opportunity to review and comment on the strategy. This will have to be analyzed in a future NEPA document.
- Finalizing Greater Sage Grouse mitigation.
- Finalizing Migratory Bird Conservation Plan

Governor Otter's Concern: The Governor is concerned that BLM's Preferred Alternative route for segments 8 and 9 in the 2013 FEIS was located primarily on neighboring private land and adjacent to communities, outside of the NCA. The Governor has maintained that a transmission line is inconsistent with city comprehensive plans. The Governor prefers to have the transmission line placed on public land within the NCA using or paralleling existing transmission line routes.

Suggested Response: BLM Idaho is working closely with the Boise District Resource RAC to identify optional routes and considerations for segments 8 and 9. We appreciate the Administrator of Idaho's Office of Energy Resources serving on the RAC subcommittee and contributing to this process. Based on the RAC report, BLM Idaho will determine what level of additional NEPA analysis is necessary. BLM Idaho will re-initiate public scoping and conduct further analysis prior to identifying a preferred alternative and reaching a final decision. BLM Idaho looks forward to close coordination with the Governor and his staff.

### **Sage Grouse**

The Final Idaho State Plan was completed and incorporated as Alternative E into the Draft EIS. The State Plan currently only applies to Federal lands with the exception of the creation of the Rural Fire Protection Associations, which are being implemented and funded by the State. BLM has been working collectively with the State of Idaho and FWS to develop a 'Proposed Final Plan' that incorporates the State Plan, including additional changes the State wanted to include into their state strategy (e.g., Core, Important, and General Management Zones). These components have been agreed to and developed in collaboration with the State.

The National Policy Team recently issued range-wide guidance that takes a different approach to management than the agreed to approach in the "Proposed Final Plan". That guidance set out an exception process for State Directors to explain why an alternative approach is warranted. The Idaho BLM State Director has submitted information to the BLM Washington Office explaining why the Idaho approach achieves similar or better outcomes for Sage Grouse. That memo is under review.

Governor Otter's Concern: The Governor's office is especially concerned with the manner in which the general National Policy Team guidance requires General Habitat (versus Priority Habitat) be managed relative to the "no net unmitigated loss of sage grouse habitat." In addition, Idaho has three tiers of habitat protection (Core, Important, and General management zones) and not two like other states. Ninety five percent of breeding males are protected by the Core Zone

(73% of breeding males) and Important Zone (22% of breeding males). This approach lays the foundation to potentially manage State and as appropriate, private lands, within this framework.

Suggested Response:

- Governor Otter, I know that your team has worked very hard with ours to come up with a strong approach to sage grouse management on public lands in Idaho.
- The National Policy Team guidance was only guidance not policy and invited State Directors to explain why alternative approaches can work given the specific facts at play in different states.
- We believe we need this step to ensure a strong record that supports similar or better outcomes from the standards set out in the NTT and COT reports.
- My understanding is that the ID BLM director is working with our Washington Office on that record. The door is not shut to the Idaho approach and we look forward to continuing to work with you.



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Washington, DC 20240  
<http://www.blm.gov>

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SEP 16 2015

Honorable C.L. "Butch" Otter  
Governor of Idaho  
Boise, Idaho 83720

Dear Governor Otter:

This letter is in response to your appeal of the response provided by the Idaho State Director regarding your consistency review of the Idaho and Southwestern Montana Sub-regional Greater Sage-Grouse Proposed Land use Plan Amendment (referred to hereafter as the PRMPA or amendment). The Governor's consistency review process is a very important part of Bureau of Land Management's (BLM's) land use planning process, and we appreciate the significant time and attention that you and your staff have committed to this effort. The partnership that exists between the State of Idaho and the BLM is significant, and I believe our joint work to address the threats to Greater Sage-Grouse (GRSG) is an excellent example of what is possible when we work toward a common goal. Like you, I hope that these efforts will allow the U.S. Fish and Wildlife Service (FWS) to determine that the GRSG does not warrant listing under the Endangered Species Act (ESA).

As you know, the amendment is the result of an unprecedented west-wide effort to conserve GRSG and its habitat through detailed conservation measures and land use planning efforts at both the state and Federal levels. Because successful management of the western landscapes inhabited by the GRSG is dependent on the actions of multiple parties, the conservation measures contained in the BLM plans are built to complement the specific commitments to GRSG conservation that have been made at the local and state levels in the State of Idaho. Of note, the BLM plan includes a three-tier habitat mapping and management approach that works in conjunction with state-specific approaches to measuring disturbance, prioritizing management actions, and responding to rangeland fire. We are pleased to have developed the amendment in close coordination with your staff in the Office of Species Conservation, the Idaho Department of Fish and Game, the Western Governors Association Sage-Grouse Task Force, the United States Forest Service (USFS), the FWS, and a wide range of other interested stakeholders.

The purpose of the National GRSG Planning Strategy is to identify and implement measures to conserve, enhance and restore GRSG habitat by reducing, minimizing, or eliminating threats to that habitat. In order to avoid a potential listing and the effects it would have on every activity on millions of acres of public and private lands, the plans need to provide a high degree of regulatory certainty that those plans will be implemented and be effective. To help achieve that level of certainty, the BLM has included common elements across the range to address specific

threats to the species and its habitat. The purpose of these common elements is to provide for a net conservation gain for the GRSG. However, the plans also recognize that different circumstances exist across the range, which is why their development included state-based variations where different approaches or priorities were consistent with the overall conservation objectives.

The BLM was able to address some of the concerns outlined in your letter through a clarification of the management direction in the amendment, particularly with regard to prioritization of grazing management actions in Sagebrush Focal Areas (SFAs). These clarifications are reflected in the Record of Decision and/or the Approved Resource Management Plan Amendment (ARMPA) <http://www.blm.gov/wo/st/en/prog/more/sagegrouse.html>.

With the aforementioned context and goals in mind, the applicable regulations at 43 C.F.R. 1610.3-2(e), state that “[t]he Director shall accept the [consistency] recommendations of the Governor(s) if he/she determines that they provide for a reasonable balance between the state’s interest and the national interest.” As more fully described above and in the State Director’s response to your consistency review, there is a strong national interest in the implementation of an effective, range-wide GRSG strategy that reduces, minimizes or eliminates threats to GRSG habitat, including common range-wide elements that provide a high degree of certainty of effectiveness in order to potentially preclude a determination by the FWS that the species is warranted for listing under the ESA.

As you know, the PRMPA represents the culmination of an extensive planning process, involving significant time and resources from numerous partners including the State of Idaho. I believe this has led to the creation of a strong, range-wide approach for the conservation of GRSG habitat on BLM lands and, for the reasons set forth more fully below, I find that the recommendations in your letter do not meet the standard described above for granting your appeal.

In your appeal, you request reconsideration and acceptance of the recommendations that were identified in your July 28, 2015 Consistency Review letter. Specifically, you assert that the BLM has not met its consistency obligations under the Federal Land Policy and Management Act (FLPMA) and that Idaho’s recommendations provide for a reasonable balance between the state’s interest and the national interest. You request that the BLM adopt your recommendations, submit a Proposed Rule to the Office of Management and Budget (OMB), and remand the consistency review to the State Director. Below is my response to those issues and recommendations:

#### **Overall Consistency with Idaho State and Local Plans**

Your appeal letter states that the BLM responses to the Idaho Consistency Review letter failed to follow section 202(c)(9) of FLPMA, which states that land use plans be consistent with state and local plans to the maximum extent the Secretary of the Interior finds consistent with Federal law. As noted above, a cornerstone of the BLM’s sage grouse planning process has been coordination and collaboration with the affected states, as demonstrated by the detailed consideration and, in many cases, adoption of the strong GRSG conservation approaches put in place by or suggested by the states, including those put in place by or suggested by the State of

Idaho. However, in order to provide the necessary regulatory certainty, the BLM found it necessary to ensure that there are consistently strong approaches to the management of BLM-managed lands range-wide. The purpose of these common elements is to provide for a net conservation gain for the GRSG. However, the plans also recognize that different circumstances exist across the range, which is why the plans have allowed for flexibility where appropriate in the sub-regional plans, such as the three-tier mapping and management approach adopted as part of the Idaho plans. As such, I must respectfully disagree with your contention that the ARMPA is materially inconsistent with the Governor's Plan. The three-tier approach in the Governor's Plan is the basis of the Idaho/Southwest Montana ARMPA. The BLM has also worked with the State of Idaho to tailor many of the "range-wide" management actions in the Idaho ARMPA, such as the recent inclusion of prioritization actions for grazing management in SFAs. These actions demonstrate how the PRMPA has adopted the fundamental tenets of the State plan.

#### **Multiple Use in the Proposed Plan**

Your appeal letter states that the BLM erroneously relied on Manual 6840, Special Status Species Management, in the development of the PRMPA and the response to the Governor's Consistency Review letter. This statement does not identify an inconsistency with state or local resource related plans, policies, or programs, therefore, a response is not required under the Governor's consistency review process. The purpose of the amendment is the conservation of a special status species, the GRSG, and the management actions in the amendment are limited to those which will conserve, enhance, and restore GRSG and its habitat consistent with the agency's multiple-use and sustained yield mission. The management actions are consistent with all of the applicable BLM regulations and policies and allow for continued multiple-use of the lands. Most uses may still occur on the lands included in the amendment, with stipulations and conditions which conserve, enhance, and restore GRSG and its habitat. Allowable resource uses of the BLM lands which are not addressed in this amendment remain in the current land use plans. Therefore, I concur with the BLM Idaho State Director's statements about the applicable purposes, policies, programs, Federal laws, and regulations applicable to BLM-managed public lands, including BLM Manual 6840.

#### **Alleged Improper Delegation**

You also assert that the BLM has improperly delegated authority to the FWS by permitting that agency to effectively veto land management decisions for an unlisted species. This statement does not identify an inconsistency with state or local resource related plans, policies, or programs, therefore, a response is not required under the Governor's consistency review process.<sup>1</sup> That said, I would note that the BLM is not and has not delegated its authority. Rather, the BLM has focused on making its planning decisions based on input from local and national experts on these issues. For example, in order to provide the most protection to GRSG in Priority Habitat Management Areas (PHMA), the areas of highest importance for the species, decisions on allowing surface occupancy during fluid mineral development will be made with the Idaho Department of Fish and Game and the FWS, the local and national experts on GRSG, respectively. The BLM is not delegating authority, but ensuring that all experts evaluate

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<sup>1</sup> Your letter claims, without explanation, that this is a "per se" imbalance. I find this to be insufficiently specific to constitute identification of an inconsistency under 43 C.F.R. 1610.3-2(e).

whether there would be direct, indirect, or cumulative effects on GRSG before allowing surface-disturbing fluid mineral development in areas of important habitat. While the BLM retains the final decision-making authority for decisions on the public lands, this input is critically important.

### **SFAs Exemption**

In your appeal letter, you request that I reconsider the request to exempt Idaho from SFAs. I have reviewed your prior comments on the development of the SFAs and I understand that your office is strongly opposed to them. While I understand these concerns, I uphold the determination of the BLM Idaho State Director that the SFAs are consistent with the BLM's range-wide GRSG conservation strategy. I also want to reiterate that the SFAs are a subset of PHMA, with limited additional management actions to ensure that the "best of the best" habitat receives the attention it deserves. In addition to the recommended mineral withdrawal and the fluid mineral no surface occupancy (NSO) stipulation without waivers, exceptions, or modifications, the ARMPA clarifies (in response to your Governor's consistency review letter) that these areas will be prioritized for a broader group of activities, including vegetation management, wild horse and burro management, habitat restoration, fire and fuels actions, as well as the review of livestock grazing permits and leases, consistent with the State of Idaho Plan.

You also assert in your appeal that in developing the SFAs the BLM has created Areas of Critical Environmental Concern (ACECs) without following the proper regulatory process. This concern does not identify an inconsistency with state or local resource or related plans, policies or programs, and therefore, a response is not required under the Governor's consistency review process. It should be noted that the SFAs are not ACECs – they are a subset of PHMAs with additional management protections, all of which were fully analyzed in the Draft and Final EISs for the Idaho plan. These additional measures include NSO without waiver, exception, or modification for fluid mineral development and a recommendation for mineral withdrawal from the 1872 Mining Law for solid minerals. These actions and recommendations do not constitute an ACEC designation under the applicable regulations. .

### **Disturbance Caps**

Both your consistency review and appeal letter requested the removal of the project level disturbance caps. The BLM included the project-level disturbance cap to ensure that disturbance is limited at both a local and landscape scale and to encourage co-location of disturbance. Based on best available science, when disturbance exceeds three percent at either scale, GRSG numbers are affected and tend to decline (derived from Holloran 2005, Walker et al. 2007, Doherty et al. 2008, Naugle et al. 2011). Disturbance caps at both the BSU and the project scale are necessary to account for the amount of existing disturbance at both scales. Calculating disturbance for each additional anthropogenic disturbance placed on the landscape is particularly important at the project scale to ensure that GRSG numbers and habitat acreages remain stable or increase. Further, calculations at both of these scales are intended to encourage clustering of disturbance and discouraging development in undisturbed habitat. This is a critically important aspect of the GRSG strategy, and therefore, I respectfully deny your appeal on this issue and uphold the State Director's determination that your recommendation is inconsistent with the goal of the BLM's range-wide GRSG conservation strategy.

It should be noted that based upon further review across the Great Basin region, the BLM is including an exception to the project-level disturbance cap for designated utility corridors, to ensure that these areas are used to the fullest extent possible as intended for utility lines and associated disturbance. This modification is consistent with BLM's goal of encouraging co-location of disturbance.

#### **Net Conservation Gain Standard**

Your appeal notes that the Governor's "... strategy is in many ways in and of itself a mitigation plan," and as a result, you expresses concern that the BLM mitigation standard of net conservation gain is in conflict with this. I respectfully disagree with this statement. Based on the way the ARPMA is structured, the Idaho State Plan, especially the three-tier approach, will serve as a key component of the BLM's mitigation strategy, and therefore the AMPRA is not in conflict or inconsistent with the state strategy. Additionally, as noted in the State Director's response, the mitigation standard in the amendment is consistent with numerous national policies, including Secretarial Order 3330 and BLM's Draft - Regional Mitigation Manual Section (MS)-1794. As a result, I deny your appeal on this issue and uphold the State Director's determination that your recommendation is inconsistent with the goal of the BLM's range-wide GRSG conservation strategy.

I would also note that going forward it will be critical for BLM and its partners to work together to develop and implement effective mitigation on the ground. This mitigation will be developed working with existing and developing mitigation approaches that are being utilized in individual states and west-wide. To do this, the BLM will utilize the expertise of state and Federal partners, through WAFWA Management Zone conservation teams, to develop mitigation strategies. Participation of your Office of Species Conservation and the Idaho Department of Fish and Game will be critical to this effort.

#### **Livestock Grazing**

You identified numerous concerns with the livestock grazing management actions in the amendment in your Consistency Review and appeal. As a result of the Governor's consistency review process, the BLM included a refinement of the prioritization strategy for livestock grazing management. The revised language states that:

"Management and conservation action prioritization will occur at the Conservation Area (CA) scale and be based on GRSG population and habitat trends: Focusing management and conservation actions first in SFAs followed by areas of PHMA outside SFA."

Under this refined language, vegetation management actions, including but not limited to the review of grazing permits, are prioritized in SFAs. In light of the agency's limited resources, we will focus our management actions first in SFAs, as these are the areas which hold the best contiguous habitat and populations. Specifically, our actions will focus on those allotments or permits not meeting land health standards in areas where the sage-grouse populations are in decline.



You also express concerns with the habitat objectives table, that the management direction associated with its use is vague and subjective. The use of the metrics in the table will be site-specific. Specifically, the habitat objectives table sets forth the desired habitat condition for permitted uses. The metrics in the table will be used, as appropriate, based on ecological site potential, in the development of land use authorizations, including but not limited to livestock grazing permits, and land health assessments. Please note, the BLM creates and uses habitat objectives for many special status species and includes them in land health assessments it prepares routinely across the west.

Finally, you expressed concern about the BLM's statement that "current grazing management will not change as a result of the SFA designation." Specifically, with respect to your statement that prioritization of grazing permit renewals in SFAs "...is really a subterfuge for elevating the activity [(i.e., grazing)] to primary threat status," I would like to clarify the intent of BLM's approach. The plans prioritize grazing permit renewals and field checks within SFAs because of the habitat quality in those areas, not because of some unstated concern about the level of threat posed by current grazing activities. As stated above, maintenance of habitat quality within SFAs is a key component of the BLM's plans. Moreover, it should be noted that the BLM, under current authority and plans, is responsible for ensuring that grazing is undertaken in an appropriate manner and that uses are meeting or moving towards meeting applicable land health standards. The amendment does not change this underlying obligation. They do however inform the applicable land health standards and place a higher focus on meeting or moving toward meeting land health standards and GRSB habitat objectives in SFAs.

Based on the foregoing, I respectfully deny your appeal on these grazing issues and uphold the State Director's determination that your recommendation is inconsistent with the goal of the BLM's range-wide GRSB conservation strategy range-wide.

### **Lek Buffers**

In your Consistency Review, you recommended that the BLM remove the uniform lek buffers from the plans. The BLM Idaho State Director's response explained that the buffers are not uniform and that local data and regulations can be considered in their application at the project development stage. The application of buffers also varies according to habitat type, with more exceptions provided in General Habitat Management Areas (GHMA) than in PHMA. Additionally, the use of the buffers identified in the Governor's Plan is allowed under the considerations put forth in the amendment, provided they provide the same level of protection for GRSB and its habitat in any particular circumstance. Again, the use of buffers will be determined on a site- and project-specific basis, during project development. Based on the foregoing, I respectfully deny your appeal on this issue and uphold the State Director's determination that your recommendation is inconsistent with the goal of the BLM's range-wide GRSB conservation strategy.

### **Required Design Features**

In your appeal, you request that I consider removing the Required Design Features (RDFs) which are not contained in the Governor's Plan. I agree with the Idaho State Director that the RDFs are an important aspect of the BLM strategy and respectfully deny your request. Similar to the buffers, there is flexibility in the application of the RDFs, such that if there is a Best

Management Practice in the Governor's Plan which provides equal protection for GRSG and its habitat, it may be used instead, and therefore the RDFs do not create an inconsistency with state or local resource related plans, policies, or programs.

Based on the foregoing, I find that the recommendations provided in your appeal letter do not meet the standard identified above for granting an appeal in accordance with 43 C.F.R. 1610.3-2(e). Therefore, I affirm the BLM Idaho State Director's response to your Finding of Inconsistency and respectfully deny your appeal, including your request to withdraw the proposed amendment and adopt the Governor's Plan in its entirety. As you are aware, through a strong partnership and significant engagement between our teams, many aspects of the Governor's Plan have been incorporated into the BLM's plan. The reasons outlined above for my decision on your appeal will also be published in the Federal Register pursuant to the applicable BLM regulations.

Despite occasional points where we have not agreed, the input that you and your staff have provided into this process has been sincerely received and enormously productive. You have shaped the ARMPA in significant ways, and the plan is stronger as a result. I look forward to our continued coordination as our teams work together to implement these plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Kornze", with a long horizontal flourish extending to the right.

Neil Kornze  
Director

الفناني



C.L. "BUTCH" OTTER  
GOVERNOR

September 8, 2015

Neil Kornze, Director  
BLM Washington Office  
1849 C Street NW, Rm. 5665  
Washington, DC 20240

Tom Tidwell, Chief  
U.S. Forest Service  
1400 Independence Ave., SW  
Washington, DC 20250

*Sent via e-mail; hard copy to follow*

RE: Consistency Review Appeal to the Director of the Bureau of Land Management and Chief of the U.S. Forest Service regarding: Idaho and Southwestern Montana Sub-regional Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement (80 Fed. Reg. 30,711, May 29, 2015)

Dear Director Kornze and Chief Tidwell,

I write to appeal, under 43 CFR § 1610.3-2(e),<sup>1</sup> the Bureau of Land Management's ("BLM") August 6, 2015 response and rejection of the recommendations contained in the Governor's Consistency Review of the Idaho and Southwestern Montana Sub-regional Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement ("Proposed Plan"). See Governor Otter's Consistency Review (filed July 29, 2015) ("Consistency Review") (Attachment 1). Simply put, the Proposed Plan stands in stark contrast to the State of Idaho's laws, policies and programs, especially Idaho Executive Order 2015-04.

The State Director's cursory response in no way resolves the numerous and material inconsistencies outlined in the July 28, 2015 Consistency Review. See State Director's Response to Governor Otter's Consistency Review (August 6, 2015) ("BLM Response") (Attachment 2). Such rejection creates an "unreasonable" imbalance between

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<sup>1</sup> As directed on page 10 of State Director Murphy's August 6, 2015 letter, "[p]lease note that you have the opportunity to appeal this response to the Director of the BLM pursuant to 43 CFR 1610.3-2(e). Such appeal must be filed within 30 days of your receipt of this letter, by September 8, 2015."

national interests and the State's interests and violates 42 U.S.C. § 1712(C)(9). *See* 43 CFR § 1610.3-2(e). I respectfully request the BLM Director and Chief Forester<sup>2</sup> to conclude that such an imbalance exists and return the Proposed Plan back to the State Director/Regional Forester with instructions to meaningfully resolve these inconsistencies, or in the alternative, adopt the recommendations outlined in the remedy section of this Consistency Review Appeal with the appropriate public participation. Failure to do so violates the BLM's consistency obligations pursuant to section 202 of the Federal Land Policy and Management Act ("FLPMA"), and the U.S. Forest Service's ("Forest Service") coordination obligations outlined in § 219.3(a) of the National Forest Management Act ("NFMA") Minimum Requirements Rule.

To briefly summarize our current status, for much of the past three years, my Administration, along with the tremendous local support of your agencies, were poised to deliver another significant natural resource milestone, similar to the Idaho Roadless Rule. That collaborative framework was abandoned in late 2014/early 2015 in favor of a top-down "uniform" solution to the sage-grouse issue. This national direction was highlighted by the internal and post-DEIS U.S. Fish and Wildlife Service ("FWS") memorandum ("Ashe Memo"), and based on this memorandum, the agencies' misguided decision to designate 3 million acres of Idaho as so-called Sagebrush Focal Areas ("SFAs"). My opposition to the SFA habitat zone and the many other overly restrictive and last minute management recommendations is no secret.

Yet, despite repeated attempts to reconcile these material inconsistencies (*See* June 18, 2015 letter to Secretary Jewell (Attachment 3)), the BLM has done little to meaningfully resolve these concerns to the "maximum extent" as required by § 202(c)(9) of FLPMA. Instead, we are advised that no flexibility exists, because modifying this new fourth SFA habitat zone along with the uniform lek buffers and the new "net conservation gain" mitigation standard will lead to a positive listing determination under the Endangered Species Act ("ESA"). Ironically, and as outlined in the Consistency Review, this push for "uniformity" by the FWS is incongruent with and ignores that agency's previous position largely endorsing the Governor's Plan as consistent with the Conservation Objectives Team Report. *See* U.S. Fish and Wildlife Serv., Greater Sage-Grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report (2013) ("COT Report").

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<sup>2</sup> There is little doubt the Forest Service has been an integral part of the preparation of the Proposed Plan. As such, the agency must participate in a consistency review of the Proposed Plan. The Forest Service cannot have it both ways – namely, that it will receive the benefits from being a Cooperating Agency partner with the BLM and Idaho throughout this entire process only to abandon its consistency obligations in the capstone exercise to this unprecedented land-use planning effort. This is especially important because the FEIS is misleading, stating that "[c]hapter 2 separates the Forest Service Proposed Plan and the BLM Proposed Plan. This is because the Forest Service has different guidance for writing planning language; however, the actions are *basically the same* for both the BLM and FS under the Proposed Plan." FEIS 2-4. As the Consistency Review demonstrated, that statement is patently untrue; and is inequitable that the Forest Service should reap the benefits of the plan amendments without fulfilling its responsibility of conducting a comprehensive review of the Governor's Consistency Review. Governor Otter strongly urges Chief Tidwell to respond to the issues identified in both the Consistency Review and this Appeal.

As evidence of this now unilateral Federal process, I exercised my right under § 202 of FLPMA providing the BLM an 82-page Consistency Review, with multiple appendices, thoroughly detailing how each relevant portion of the Proposed Plan was and still is inconsistent with the “plans, policies, or programs” of the State of Idaho and local governments. The Consistency Review discussed in great detail how the Governor’s Plan<sup>3</sup> appropriately balances the BLM’s multiple-use mandate with the conservation needs of greater sage-grouse as outlined in the section titled, “*The Governor’s Plan, not the Proposed Plan, represents a balanced solution and is a perfect fit to meet the needs of the species in Idaho*”. Consistency Review at 65. Unfortunately, after the significant effort and resources expended to achieve a true planning partnership, the BLM provided – in just 6 business days – a 12-page form letter only somewhat tailored to Idaho’s concerns,<sup>4</sup> and summarily denying all of the Consistency Review’s recommendations.<sup>5</sup> This denial exacerbates the multiple legal issues in the Proposed Plan rendering it *per se imbalanced* and arbitrary and capricious.

The imbalance stems from the BLM’s contention that Idaho’s sage-grouse policy embodied in Executive Order 2015-04, without any analysis or explanation, does not comport with BLM’s legal obligations under the agency’s Special Status Species Manual 6840 (“Manual 6840”), and BLM’s Instruction Memorandum 2012-044 (“IM 2012-044”). BLM Response at 3. At no point in this process has the Bureau notified Idaho that the Governor’s Plan does not meet the provisions in Manual 6840. If that had been the case, the BLM would have rejected the Governor’s Plan, in the Draft Environmental Impact Statement (“DEIS”) as an “alternative considered but eliminated from detailed analysis” under the National Environmental Policy Act (“NEPA”). But rather than legitimately grapple with these difficult issues, this post-hoc rationalization only serves to paper over the agencies’ failure to analyze or explain (i.e., take the requisite “hard look” pursuant to NEPA) how the Proposed Plan better meets these legal obligations or the conservation needs of the species as compared to the Governor’s Plan. In short, the BLM’s Response is wholly inadequate under FLPMA.

At bottom, the agencies’ course of action over the past several months fail to honor Idaho’s rights pursuant to § 202(c)(9) of FLPMA and as a cooperating agency under NEPA, as well as the many commitments two Secretaries of Interior have promised my State. The underlying record demonstrates that the Governor’s Plan is consistent with the stated purpose of BLM’s planning effort, which is to “identify and incorporate appropriate conservation measures in LUPs to conserve, enhance and/or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat.” BLM Response at 3. My sincere hope is the agencies will recognize it is in the long-term benefit of the species to correct the imbalance by diligently working with my Administration to resolve these issues through this appeal process.

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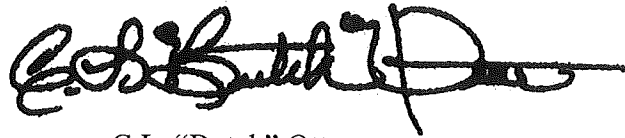
<sup>3</sup> The “Governor’s Plan” includes Idaho Exec. Ord. 2015-04 and the associated appendices.

<sup>4</sup> Identical language can be found in BLM’s Consistency Review responses to at least Governor Herbert (Utah) and Governor Sandoval (Nevada).

<sup>5</sup> In the letter from State Director Timothy Murphy to Governor Otter, dated August 6, 2015, Director Murphy did agree to “work with” the State of Idaho to refine BLM’s approach to prioritizing grazing permit renewals in Sagebrush Focal Areas.

Thank you in advance for your positive consideration of this Consistency Review Appeal. As you know, this process provides the final opportunity to achieve and preserve a meaningful state-federal partnership, contemplated by FLPMA, on this important issue. My Administration is fully prepared to resolve the identified inconsistencies with the BLM and Forest Service, as required by federal law and regulation. Please contact Cally Younger at 208-334-2100 with any questions or concerns.

As Always – Idaho, “Esto Perpetua”

A handwritten signature in black ink, appearing to read "C.L. Butch Otter". The signature is stylized and includes a long horizontal flourish extending to the right.

C.L. “Butch” Otter  
Governor of Idaho

Cc: Idaho Congressional Delegation  
Idaho Sage-Grouse Task Force  
Tim Murphy, State Director, Idaho BLM  
Nora Rasure, Regional Forester, Intermountain Region of USFS  
Mike Carrier, State Director, FWS

## I. THE AGENCIES FAILED TO MEET THEIR CONSISTENCY OBLIGATIONS TO IDAHO UNDER FLPMA

Congress determined that federal land use planning is not the sole province of the United States. Section 202(c)(9) of FLPMA directs the Secretary of the Interior to coordinate the land use planning process with State and local governments and that the resulting federal land use management plans must substantially reflect this consultation and coordination. 43 U.S.C. § 1712(c)(9). The BLM Response fails to achieve the full planning partnership envisioned by Congress to protect the interests of state and local governments, especially those like Idaho, whose custom, culture and way of life are inextricably intertwined with decisions made on federally-managed lands. These obligations are not perfunctory in nature. *See American Motorcyclist Ass'n v. Watt*, 534 F. Supp. 923, *affirmed* 714 F. 2d 962 (9th Cir. 1983). The below sections identify the following errors with the State Director's response.

### A. BLM has failed to ensure that the LUPAs are consistent to the “maximum extent” with State direction.

As noted above, the BLM failed to follow section 202(c)(9) of FLPMA and its implementing regulations. Section 202(c)(9) requires consistency to the “maximum extent.” 43 U.S.C. § 1712(c)(9) (Land use plans of the Secretary under this section shall be consistent with State and local plans to the *maximum extent* he finds consistent with Federal law and the purposes of this Act) (emphasis added). Further, Congress directed the Secretary to “assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands,” and “assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans.” *See Consistency Review* at 8.

This direction is reaffirmed in BLM's regulations, which direct the Secretary to develop federal land use plans that are consistent with those State and local plans and satisfy the purpose of FLPMA and other federal laws:

Guidance and resource management plans and amendments to management framework plans shall be consistent with officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State and local governments and Indian Tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal law and regulations applicable to public lands....

43 C.F.R. 1610.3-2(a). It is clear that Congress envisioned land use planning decisions to be made in concert with states, through consultation and collaboration, and not merely as an inconvenience for federal agencies that excludes meaningful input from states at critical junctures, as was the case here.

The BLM's interpretation of how to evaluate Land Use Plan Amendments (“LUPAs”) for consistency involves a two-step process: (1) determine if there is an actual inconsistency with an



officially approved state plan, policy or program; and (2) if such an inconsistency exists, whether a recommendation addresses that inconsistency and provides for a reasonable balance between the national interest and the State's interest. *See* Notice of BLM Director's Response to an Appeal from the Governor of New Mexico Regarding the Resource Management Plan Amendment for Federal Fluid Minerals Leasing and Development in Sierra and Otero Counties, 70 Fed. Reg. 3550, 3552 (January 25, 2005); *see also*, *New Mexico ex rel. Richardson v. BLM*, 565 F.3d 683 (10th Cir. 2009). This is the framework that Governor Otter expected, at a minimum, out of this Consistency Review process. However, the response Governor Otter received demonstrates that the Department of Interior is more concerned with meeting an arbitrary settlement deadline with environmental groups than complying with its statutory obligations to the state.

Specifically, several factual circumstances surrounding this Consistency Review indicate that FLPMA's maximum extent directive was not followed. For example, the amount of time that BLM took to respond to Governor Otter's Consistency Review was insufficient and lacked meaningful evaluation of the points raised in the document. Also, the BLM Response did not follow the general framework for Consistency Review responses, glossing over a vast majority of material inconsistencies identified by the Governor, and completely failing to address the second prong "balance of interests" analysis as outlined above.

In his response, the State Director states that, "the BLM generally only responded to issues that [Governor Otter] identified as being inconsistent with [his] State's (or other local and tribal) plans and not issues of disagreement [sic] with portions of the Proposed Land Use Plan Amendment/Final Environmental Impact Statement." BLM Response at 4. Importantly, Governor Otter's Consistency Review outlined multiple areas of inconsistency – not just disagreements – with his plan in the conspicuously titled section, "THE PROPOSED PLAN IS MATERIALLY INCONSISTENT WITH THE GOVERNOR'S PLAN." Consistency Review at 10. Throughout that section, the Consistency Review cited to specific portions of the Governor's Plan and the LUPAs. The BLM's failure to address the approximately fifty-one (51) pages of inconsistencies contained in this section, and selecting only a portion of the issues to address, simply does not meet its consistency obligations.

Moreover, the BLM did not accept *any* of the Governor's recommendations for resolution of the inconsistencies. The promise to "continue to work with the State to further refine our approach for prioritizing the review of grazing permits/leases and the processing of grazing permits/leases in SFAs to better reflect the prioritization approach adopted in the Idaho State Plan for CHZs," found in the State Director's response, hardly constitutes an acceptance of a recommendation contained in the Governor's Consistency Review and is of little solace to Idaho. *See* BLM Response at 9. Likewise the addition of language "to include state-implemented conservation measures or protections as an alternative to consider in the application of RDFs," is likewise not an acceptance of the Governor's recommendation. *Id.*

Based on these circumstances, it is clear the BLM failed to meet the "maximum extent" threshold for consistency reviews and reduced this important process to a check-the-box exercise for the agency. This Appeal represents the last opportunity for the Director to rectify this error, and accept the Governor's recommendations that are outlined below.

**B. BLM erroneously relied on Manual 6840 to avoid its responsibilities under NEPA and FLPMA.**

Where the State Director does address issues of inconsistency in the Proposed Plan, he begins with the faulty premise that the Governor's Plan is inconsistent with the purposes, policies, and programs of federal laws applicable to public lands. *Id.* at 3. The BLM Response attempts to justify this position by stating that the agency must "manage public lands for *multiple-use and sustained yield*, taking into account the long-long term needs of future generations for renewable and non-renewable resources – including fish and wildlife – and to seek achievement and maintenance in perpetuity of renewable resources." *Id.* (citations omitted). BLM goes on to describe Manual 6840, and IM 2012-044, initiating the BLM National Greater Sage-Grouse Land Use Planning Strategy.

Multiple-use is "a deceptively simple term that describes the enormously complicated task of striking a balance among the many competing uses to which land can be put, including but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and uses serving natural scenic, scientific, and historical values." *Norton v. Southern Utah Wilderness Alliance*, 542 U.S. 55, 58 (2004) (citing 43 U.S.C. § 1702(c)) (internal quotations omitted). But multiple-use in this context does not mean that the agencies can subordinate all uses in favor of a single use and unlisted species (e.g. sage-grouse). *See The Lands Council v. McNair*, 537 F.3d 981, 990 (9th Cir. 2008) ("Congress has consistently acknowledged the Forest Service must balance competing demands in managing National Forest System lands. Indeed, since Congress' early regulation of the national forests, it has never been the case that the national forests were...to be set aside for *non-use*." ) (emphasis added).

This is precisely what BLM is recommending with this Proposed Plan pursuant to the direction contained in the self-described "new paradigm" of the National Technical Team (NTT) Report. And in fact, that is why the agency itself developed a modified-NTT alternative in the DEIS (Alternative D) because BLM recognized that implementing the full-blown NTT Report is "blatantly illegal" and materially inconsistent with its multiple-use mandate. *See Consistency Review* at 72-3 (noting that Governor Otter personally reviewed several NTT FOIA documents, he wrote the Secretary the following: "Even more shocking is the absence of anything in the scientific record warranting these draconian measures. In fact, one email reveals a career BLM employee expressing the following concern in the late stages of this process: '*But does the NTT really want to recommend something that is blatantly illegal?*'"). Yet despite this acknowledgment, the Proposed Plan stands at odds with the agencies' multiple-use mandate and exceeds their delegated authority from Congress.

Even more to the point, the State Director's interpretation of FLPMA implies that the BLM's policy on special status species trumps its multiple-use requirement. Several times in the BLM Response, the agency declines to adopt the Governor's Recommendation because "it is not consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands." *See e.g.*, BLM Response at 5 (BLM does not adopt Governor's recommendation on SFAs). In declining to adopt the Governor's recommendations, BLM fails to provide any reference to the specific laws, or any meaningful analysis, supporting its denial. They do,

however, cite on multiple occasions the BLM's Sage-Grouse Strategy, and the Special Status Species Policy as justification for not accepting the Governor's recommendation in the Consistency Review. *Id.* (in light of BLM's Sage-Grouse Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GRSG and its habitat...). As mentioned above, this is the first instance where BLM notified the State that the Governor's Plan is not consistent with Manual 6840, and the underlying record and the NEPA process simply do not support this premise. Moreover, this implies that the Special Status Species policy and the NTT Report are in incompatible with the COT Report. As you are aware, the U.S. Fish and Wildlife Service affirmed that the Governor's Plan met the COT Report's objective of strategic conservation. *See* Consistency Review at 3; Consistency Review Appendix 4 (Letter from U.S. Fish and Wildlife Serv. to Governor C.L. "Butch" Otter (August 1, 2012)). At bottom, it is the Proposed Plan that is incompatible with the agencies' legal and policy obligations not the Governor's.

The net result of this pretense is that the public shielded from the opportunity to comment on the Governor's reasonable recommendations. This violates 43 C.F.R. §1610.3-2(e) which states, "[i]f the written recommendation(s) of the Governor(s) recommend changes in the proposed plan or amendment which were not raised during the public participation process on that plan or amendment, the State Director shall provide the public with an opportunity to comment on the recommendation(s)." At a minimum, the Director must correct the State Director's error and allow the public an opportunity to comment on the Governor's recommendations.

**C. The BLM failed to consider the unreasonable imbalance between Idaho and federal interests.**

The BLM regulations require the agency to accept the Governor's recommendations when they "provide for a reasonable balance between the national interest and the State's interest." 43 C.F.R § 1610.03-2(e). In the Governor's Consistency Review, a section titled "FAILURE TO ADOPT GOVERNOR OTTER'S PLAN WOULD CONSITUTE AN UNREASONABLE IMBALANCE BETWEEN NATIONAL AND STATE INTERESTS" was ignored by the State Director in his response, and must be addressed prior to executing the Record of Decision and the final LUPAs. *See Id.* at 64-81. This rejection creates an unreasonable imbalance by demonstrating: (1) the Governor's Plan, not the Proposed Plan, strikes the appropriate federalism balance and is the perfect fit to meet the needs of the species in Idaho; (2) the Proposed plan is legally infirm and by definition imbalanced; (3) the Proposed Plan rejects collaboration in favor of top-down management; and (4) the Proposed Plan overrides the state's sovereign authority over its wildlife. *Id.*

Idaho BLM did not address the Governor's contention that the Proposed Plan does not strike a reasonable federalism balance. Consistency Review at 64. The Governor's Plan meets the Purpose and Need statement, is based on the best available science, appropriately addresses the key threats in Idaho, and provides for achievable implementation. *Id.* at 65.

Nor does Idaho BLM deny, or respond to the fact that they have improperly delegated authority to the FWS by permitting that agency to effectively veto land use management

decisions for an unlisted species. At nearly every critical juncture in the Proposed Plan, BLM failed to fulfill its own independent legal obligations at the behest of the FWS. Namely, BLM created Areas of Critical Environmental Concern (ACECs) without the proper regulatory process by accepting the SFA recommendation (*see Id.* at 77-79), adopted an unnecessary project-level disturbance cap not based on sound science, and effectively gave FWS veto authority over exemptions in Idaho's CHZ. These legal flaws, among others, render the Proposed Plan *per se* imbalanced, and compel the Director to make that imbalanced finding and remand the Proposed Plan back to the State Director/Regional Forester to fulfill the agencies' legal obligations.

The Director/Chief Forester must respond to these concerns in his reply to this Consistency Review Appeal prior to the signing of the Record of Decision.

## **II. THE AGENCIES MUST RECONSIDER THE RECOMMENDATIONS THAT WERE REJECTED.**

### **A. Sagebrush Focal Areas (SFAs)**

In the BLM Response, the State Director denied Governor Otter's request to exempt Idaho from the SFAs and its draconian regulatory measures. As noted at the outset, the designation of 3 million acres of so-called SFAs is of particular concern to Idaho and is procedurally, scientifically, and substantively flawed. *See e.g., Id.* at 13-15. BLM's denial states that the agency "declines to adopt [the Governor's] recommendation because it is not consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands." BLM Response at 5. Rather than legitimately grapple with these concerns, BLM attempts to provide a timeline describing when the states were notified of the Ashe Memo and the other last minute national direction. Again, it is important to note that the BLM Response does not offer details of why the Governor's three-tiered habitat and management continuum approach is inconsistent with federal laws and policies. *Id.* at 5-6.

As to the timeline, the BLM Response claims the states were notified of the SFA designation through a November 2014 conference call. *Id.* at 5. However, this is only partially accurate and in no way satisfies the commitments made by two Secretaries of the Interior to Governor Otter.

While Idaho and the other states were made aware of the Ashe Memo in late October 2014, nothing in the memo or the attached maps put the State of Idaho on notice that this was a precursor to the agencies proposing a fourth habitat zone with its unnecessary management recommendations, such as a sweeping proposal for mineral withdrawal and no surface occupancy ("NSO") for fluid mineral development across approximately 3 million acres in Idaho. *See Ashe Memo* (identifying and recommending a subset of "strongholds" with the "strongest levels of protection," but making no mention of SFAs, withdrawals, NSO, or prioritization). In fact, at the time of the Ashe Memo's release, Idaho had no reason to believe that the Governor's Plan was inconsistent with a "best of the best" approach. This assumption was reinforced by the previous correspondence from FWS, and Idaho was confident that the Governor's Plan provided the "highest degree of protection" as recommended in the Ashe Memo

because of the conservation measures in the Core Habitat Zone. However, that reasoned assumption was undermined by subsequent actions by the agencies:

- In late October 2014, the states were notified by the Interior Department that FWS would like to designate priority areas within the Priority Areas for Conservation (PACs) identified in the COT. Interior officials referred to this designation as “superPACs.” *See* Email from Sarah Greenberger, Counselor to the Secretary, Office of the Secretary, Department of Interior, to Virgil Moore, Director of Idaho Department of Fish and Game, Dustin Miller, Administrator of the Office of Species Conservation, Executive Office of Governor C.L. “Butch” Otter, (“OSC”) Cally Younger, Associate Counsel to Governor C.L. “Butch” Otter, et al (October 28, 2014, 12:10 MDT) (Attachment 4).
- On October 30, 2014, Idaho received a subsequent email from Jim Lyons, Deputy Assistant Secretary for Land and Minerals Management, describing the similarity between these “super-PACs” and ACECs. In this email Jim Lyons stated that ACEC designations were “one of the approaches that the FWS has suggested for identifying and describing the management actions relevant to the ‘superPACs’.” *See* Email from Jim Lyons, Deputy Assistant Secretary, Lands and Minerals Management to Dustin Miller, Administrator, OSC (October 30, 2014 10:37 AM MDT) (Attachment 5) (stating that ACECs were one of the approaches that the FWS suggested for identifying and describing the management actions relevant to ‘superPACs’). Further, he stated that ACECs were not a substitute for wilderness but were “a means to identify and develop management direction for areas of special value and significance.” *Id*; *See* Governor’s Consistency Review at 77-79 (pointing out that SFAs are *de facto* ACECs that did not undergo the requisite analysis and process for such a designation). The email made no mention of the fact that BLM analyzed and rejected a large-scale ACEC designation in the DEIS.

Notwithstanding these emails, the State of Idaho was repeatedly told that the Ashe Memo was largely for other states, and that the Governor’s Core Habitat Zone was Idaho’s version of a superPAC. Again, this is consistent with FWS’s previous correspondence with the Governor, the selection of Alternative E as a co-Preferred Alternative, and at that point, the ongoing interagency and stakeholder refinement process.

- On November 6, 2014, there was a conference call between Interior and the states with members of the Governor’s staff attending in person. Following the conference call, there was also an Idaho specific meeting that same day to further discuss “superPACs.” Interior officials again discussed the idea of an ACEC designation and the State appropriately and emphatically rejected that approach. Interior stated that no management changes were necessary and the Core Habitat Zone in the Governor’s Plan simply needed a more descriptive name in their effort to identify areas of special value and significance to sage-grouse. The three staff members that attended that meeting have no recollection of discussing additional management criteria within superPACs at that meeting. *See* Letter

from Idaho Fish and Game Director Virgil Moore to Dustin Miller, Administrator, OSC (September 8, 2015) (Attachment 6).

- This lack of consultation and coordination is further evidenced by the fact that Interior officials downplayed SFA designations and new management criteria at the next several Secretary's Sage-Grouse Task Force Meetings. *See* Secretary's Sage-Grouse Task Force Meeting Notes for January 2015 (Attachment 7) and March 2015 (Attachment 8) (only discussing the NSO stipulations for new oil and gas leases in the January 2015 meeting, and in March 2015, addressing concerns from states about locatable mineral withdrawals, but never providing the full picture of the measures associated with SFA designations).
- It wasn't until late January/early-February that the BLM provided the full picture of SFAs and associated management actions to Idaho and began to discuss the State's significant issues with this top-down approach. *See* Email from Jonathan Beck, Greater Sage-Grouse Planning Lead for the Bureau of Land Management to Dustin Miller, Administrator, OSC (February 4, 2015 4:48 PM MST) (Attachment 9).

It was not until late January 2015 that Idaho became aware that "superPACs" were renamed "Sagebrush Focal Areas" and its associated ruleset. *See* Secretary's Sage-Grouse Task Force Meeting Notes, January 2015. Idaho and other states adamantly opposed this new designation, culminating in a meeting in Washington, D.C. in April 2015 with Interior officials<sup>1</sup> and governors' staff from Idaho, Utah, Nevada and Colorado. In this meeting, the states discussed their concerns with the new national direction and provided recommendations for resolving these issues. Notwithstanding these recommendations, the states were advised it was too late for any meaningful management changes and that FWS not only needed the agencies to propose mineral withdrawals, but that a "not warranted" decision would be based on the withdrawals actually occurring. This simply does not meet the agencies' obligations to consult and coordinate with the states as partners in this process.

In May 2015, Idaho was given a very brief (10 day) opportunity to provide comments on the administrative draft proposed plan (ADPP) with the State continuing, with no avail, to voice its opposition to SFAs and the other material inconsistencies created by the last minute national direction. *See* Letter from Dustin Miller, Administrator, OSC, to Jeff Foss, Interim Dir., Idaho BLM (May 13, 2015) (Attachment 10) (stating that the SFAs stand to "diminish the work completed by the Governor's [Task Force], the State of Idaho, and our local federal partners.").

The BLM Response clearly attempts to convey the notion that the State had ample opportunity to respond to this national direction, but that is no substitute for the consultation and coordination obligations owed to Idaho or the commitments from the Secretary to the Governor. As a cooperating agency, and consistent with § 202(c)(9) of FLPMA, SFAs should have been vetted not only through the Governor's Task Force but also subject to public scrutiny in a SEIS.

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<sup>1</sup> From Interior, National BLM Director Neil Kornze, Deputy Asst. Secretary for Lands and Minerals Jim Lyons, Counsel to the Secretary Sarah Greenberger, Michael Bean, Ed Roberson, Steve Ellis, and Amy Luders

Instead, the State was notified of the SFAs with scant detail of the actual management implications until there was no meaningful opportunity or flexibility to make adjustments, or even consult with the state agency legally charged with managing the species. Now this fatally flawed problem will be further amplified as the Secretary has informed Idaho and the other states that the sweeping and unprecedented mineral withdrawal process under § 204 of FLPMA is imminent. Such an ill-advised decision is an unnecessary diversion of resources (also not addressed in the Consistency Review), will require Idaho to participate in another costly and time consuming process premised on a legally flawed document, and will pose an immediate and irreparable injury to Idaho and mining claimants across the region that will face certain forfeiture of those claims. This irretrievable commitment of resources and the cumulative impacts of such a proposal has not been analyzed or disclosed under NEPA. These issues do not even include the burdensome ESA listing process. Before the Secretary sets back collaborative collaboration across the West for decades, she should ask the Court or Congress for more time and develop a reasonable path forward.

## **B. Disturbance Caps:**

On page 20 of the Consistency Review, the Governor stated, “the recommendation for a uniform project-level [NTT-level] disturbance cap is not based on the best available science, and that his plan adequately addresses concerns about disturbance.” Again, BLM’s Response denying Governor Otter’s recommendation to eliminate the project level disturbance cap does not address the issue. As noted in the Consistency Review, the Governor’s Task Force was willing to accept a Conservation- Area level (or BSU-level) disturbance caps in the spirit of collaboration and interagency refinement. This was in addition to, Alternative E’s adoption of project level caps for fluid mineral development based on Wyoming’s DDCT strategy. *See* Consistency Review at 36 (The Governor’s Plan only adopts a project-level disturbance cap for fluid mineral development.).

For Idaho, the record is clear that a project level [NTT-level] cap was introduced for the first time in the Proposed Plan. Yet instead of analyzing the Governor’s specific concern, BLM treats all disturbance caps the same and bizarrely suggests it was the State’s idea to include a project-level cap in the Proposed Plan. “Through collaborations with the state of Idaho, BLM modified the disturbance cap concept using the best available science...to develop a disturbance cap strategy that would incorporate the Degradation of Threats presented in Appendix G of the FEIS.” BLM Response at 6. The Governor requests that the Director review the Governor’s Task Force recommendations of April 2014 where this collaborative group explains why the Conservation Area disturbance caps better meet the needs for sage-grouse than the NTT Report’s recommendation.

Consistent with the agency’s own direction in Appendix G, implementing and enforcing a project level disturbance cap is unnecessary in Idaho. Moreover, the formula for determining whether the cap has been exceeded is extremely confusing and unworkable. Further, the BLM Response offers no rebuttal to the fact that project level disturbance caps are based almost exclusively on BLM’s misapplication of one study by Dr. Steve Knick that never used the term. *See* Consistency Review at 20 (Dr. Knick’s study “has very little to do with disturbance caps and in fact, never uses that term”).

None of these concerns are addressed in Idaho BLM's response. In fact, Idaho BLM only provided three short paragraphs in response to Governor Otter's recommendation that project level disturbance caps be eliminated. There is no explanation for the necessity of a cap at such a fine scale in Idaho other than to suggest that FWS desired "uniformity". Thus, given the lack of response from Idaho BLM, the Director must reconsider Governor Otter's recommendation to remove project level disturbance caps from the Proposed Plan.

### **C. Net Conservation Gain Standard**

Beginning at page 21 of the Consistency Review, Idaho notes that the State's strategy "is in many ways in and of itself a mitigation plan." The zonal structure and management continuum encourage development outside of the CHZ, and to a lesser extent IHZ, to ensure a high level of conservation for the best habitat and the highest concentration of bids." Despite that approach – largely consistent with other states' approach to mitigation – the BLM without any real explanation or analysis shifted from a "no net loss" standard in the DEIS to a "net conservation gain" standard in the FEIS. Nor does BLM explain or analyze how this new standard meets or modifies the existing statutory standard for mitigation under § 1732(b) of FLPMA – the unnecessary or undue degradation standard. Without disclosing this information, BLM again exceeds its delegated statutory authority under FLPMA and likely violates the Administrative Procedure Act.

As reflective of all of the BLM's Response to Governor Otter's recommendations and concerns, the agency's discussion of this new standard is both confusing and unpersuasive. At every opportunity, Idaho questioned the "no net unmitigated loss" standard for vagueness. Rather than better defining this standard or analyzing any reasonable range of alternatives, the mitigation standard was changed without notice. BLM's Response offers no additional guidance on how this new standard will be implemented other than to simply throw up its hands and suggest that it will be fleshed out in the Regional Mitigation Strategy. This is an abdication of BLM's independent legal obligations under NEPA.

On page 6, the Response states, "...the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation." But that simply restates the LUPA language; it does not answer any of the concerns or inconsistencies raised in the Consistency Review (e.g. how this standard differs from the one analyzed in the DEIS). This confusion is further compounded by the BLM Wyoming's response to Governor Mead. On page 5, Wyoming BLM states its approach to this standard is somewhat different than Idaho BLM, "[f]urther, the BLM's standard for 'net conservation gain' for compensatory mitigation is *consistent* with the State of Wyoming's standard of maintaining a landscape scale result that is beneficial to sage-grouse. There is no specifically identified inconsistency between the State of Wyoming's mitigation standards, as outline in EO 2015-4 and BLM's net conservation gain standard." So which is it: a) the framework [state plan] itself works to achieve a net conservation gain; b) only the compensatory mitigation component is a new standard; or both? These are questions that should have been addressed and analyzed in the FEIS and not addressed in piecemeal fashion or on an ad-hoc basis.



To this end, BLM claims that the public was on notice of this directional shift based on FWS' 2014 GRSG Mitigation Framework to "be strategically designed to result in net overall positive outcomes for sage-grouse." Again, this mitigation framework was released after the DEIS, and BLM provided no notice that it would be adopting this approach. Reflective of BLM's last-minute changes, the agency simply shirked its own independent legal responsibility under NEPA because FWS desired more "certainty." Accordingly, BLM must analyze these issues in a SEIS.

#### **D. Livestock Grazing**

The BLM Response fails to address the numerous issues raised in the Consistency Review related to livestock grazing. *See* Consistency Review at 49-56. Again, the BLM Response relies heavily on *post hoc* rationalization (i.e. IM 2012-044 and Manual 6840) in their decision to disregard the Governor's recommendations. BLM Response at 7. Yet, the agency fails to describe how the Governor's Plan for livestock grazing is inconsistent with any of the BLM's statutory and regulatory obligations, especially in light of the fact that the 2010 "warranted but precluded" listing determination<sup>2</sup> ("2010 Finding") by FWS and the COT Report treat improper grazing as a secondary threat.

While Idaho is somewhat encouraged that the BLM is considering actions to place improper livestock grazing in the appropriate context as a secondary threat, this contemplated action cannot amount to a meaningful resolution of these important issues given the limited agency decision space between the FEIS and the ROD. *See id.* (stating the BLM will "make clear that appropriately-managed livestock grazing is not a threat and may continue under the plans."). Only a supplemental EIS can cure this defect. Below are three of the significant issues that were not addressed, or inadequately addressed, in the BLM Response related to livestock grazing. Again, the Governor's Consistency Review represents a complete and exhaustive analysis of the State's concerns with a list of appropriate recommendations that is incorporated here by reference.

First, the BLM continues to obfuscate and defend their decision to include livestock grazing in the SFA regime. As stated in the Consistency Review, this is not only inconsistent with the Governor's Plan, but also belies the notion that the BLM did not inappropriately elevate livestock grazing to primary threat status. *See* Consistency Review at 52. The federal agencies' elevation of livestock grazing in the SFA's is also arbitrary and capricious because, prior to the national direction, the FWS was very supportive of the Governor's livestock strategy. *See Id.* (quoting FWS letter that the livestock strategy is a "wise approach for regulating the appropriate conservation action for the secondary threat of improper grazing..."). The Governor's Plan, including its livestock strategy, adequately maintains "strong, durable, and meaningful protection" without the need for additional, and costly management actions. *See* BLM Response at 7.

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<sup>2</sup> *See* Endangered and Threatened Wildlife and Plants; 12-Month Findings for the Petitions to List the Greater Sage Grouse as Threatened or Endangered, 75 Fed. Reg. 13,910 (proposed Mar. 23, 2010) (to be codified at 50 C.F.R. pt. 17)/

Second, the BLM Response does not adequately address the inconsistencies identified in the Proposed Plan's habitat standards. *See* FEIS at RM-17. The Proposed Plan includes vague and subjective language such as "specific management thresholds" and "one or more defined responses" that without clarification or adequate explanation will arbitrarily constrain agency discretion and result in unnecessary default responses, such as seven inch stubble height, without regard for localized conditions. *See* Consistency Review at 52. The Governor's Plan aligns with the COT report and its requirement for habitat objectives recognizing that the ecological site potential may alter these desired habitat conditions. *See Id.*; COT Report at 45. In short, the Proposed Plan undermines the fundamental premise in the Governor's Plan to incentivize *rather than punish* livestock producers for strong populations and quality habitat.

Third, another concerning aspect of the BLM Response is its specious assurance that "current grazing management will not change as a result of the SFA designation." BLM Response at 8. While Idaho and livestock operators indeed hope this to be true, the analysis in the Proposed Plan and the BLM Response provides little support for this statement. *See e.g., Id.* ("This approach provides the FWS with the *certainty* that the BLM will take prompt action when any range-use is not meeting or moving towards meeting, a GRSG habitat objective or land health standard.") (emphasis added). Moreover, the BLM's analysis validates the presumption that grazing will be reduced in the SFAs by unlawfully suggesting that an SEIS is unnecessary because a greatly reduced or no grazing alternatives were analyzed (and rejected) at the DEIS stage; thus, the impacts to grazing from the adoption of SFAs have been analyzed. FEIS at 2-2; *see also* FEIS 4-192 (describing no real additional impact from including grazing in the SFA regime). Notwithstanding the NEPA errors in this conclusion, BLM's position only serves to reinforce the notion that including grazing in the SFA regime is really a subterfuge for elevating the activity to primary threat status. In short, these declines were not adequately analyzed in the FEIS owing to the fact that they were an about-face from the agencies' previous positions. And if this presumed reduction in livestock grazing across sage-grouse habitat comes to fruition, the ensuing economic ripple-effect will be felt at the State and local government levels.

Again, the Governor's Strategy is wholly consistent with the Idaho Rangeland Health Standards, the COT Report, and the 2010 Finding; as well as Manual 6840 and IM 2012-044 and, as such, must be adopted. *See* 43 C.F.R. § 1610.3-2. The Proposed Plan's approach is imbalanced.

#### **E. Lek Buffers**

The justification in the BLM Response for rejecting the Governor's recommendation to remove all post-DEIS uniform lek buffers is two-fold. First, the agency contends that lek buffers will not be determined until a project level site-specific NEPA analysis is completed, which will make the Proposed Plan consistent with the Governor's Plan. BLM Response at 8. Second, the BLM again defaults to its obligations under Manual 6840, IM 2012-044, and the need to provide regulatory certainty for FWS. Again, there is no analysis or explanation as to why the Governor's Plan with its management continuum approach is inconsistent with this guidance or how it now suddenly fails to provide the requisite and appropriately-tailored regulatory certainty.

At the outset, it is important to note that the BLM Response does not respond to the Governor's claim that the USGS Report represents a significant change post-DEIS that should have been publicly disclosed and vetted through an SEIS. *See* Consistency Review at 10, 60. Until such time that the public has been afforded the opportunity to review and vet the USGS Report, it cannot stand as the best available science for lek buffers.

The agency's first claim that site specific NEPA is necessary before determining lek buffers does not obviate the agency's need under section 1610.3-2(e) to adopt the Governor's recommendation if it provides a "reasonable balance." The Governor's Plan recognizes the value and need for reasonable lek buffers within Core, and to a lesser extent Important, (PHMA and IHMA) Habitat Zones; however, the Governor's Plan eliminates land-use level uniform lek buffers in the General habitat. *Id.* at 58. The agencies' promise of variances from uniform lek buffers is simply illusory. *Id.* at 59. Also, the Governor's Plan's tiered management continuum places emphasis on providing greater protections where they are needed the most (*i.e.*, Core and Important Habitat), instead of the BLM's blanket standard that applies equally, regardless of habitat quality, in General Habitat (5% of the population) as it does in Core (Priority) Habitat (73% of the population). *See* Idaho Exec. Ord. 2015-04; Consistency Review at 59.

Secondly, as discussed, *supra*, the BLM Response claiming that the agency is obligated under their internal guidance to deny the Governor's recommendations does not pass muster. The Governor's Plan, which includes requirements for lek buffers, is inherently consistent with Manual 6840 because the Governor's Plan is *specifically* tailored to address the conservation needs of sage-grouse in Idaho based on actual on-the-ground information. Absent an analysis of how or why the Proposed Plan is even incrementally better for sage-grouse than the Governor's Plan, this argument cannot stand. Further, IM 2012-044 simply guides development of conservation plans for sage-grouse in this process. In fact, this IM actually encourages science-based collaboration with the states and is consistent with the Governor's Plan. The IM states:

"These goals and objectives are a guiding philosophy that should inform the goals and objectives developed for individual land use plans. However, it is anticipated that individual plans may develop goals and objectives that differ and are specific to individual planning areas." *See* IM 2012-044.

For these reasons, the Director must reconsider Governor Otter's recommendation to adopt the Governor's Plan and abandon the Proposed Plan's implementation of lek buffers.

#### **F. Required Design Features in all Habitat Types:**

In the "The Governor's Plan for Large-Scale Infrastructure is Commensurate with the Threat Level in Idaho and Provides an Adequate Regulatory Mechanism," section of the Consistency Review, Governor Otter points out that the required design features (RDFs), among other issues, contained in the Proposed Plan "blurs the distinction between habitat zones and renders the state's extensive mapping exercise effectively moot." *See* Consistency Review at 23-24. Specifically, "application of the net conservation gain standard, lek buffers, and RDFs in GHZ" renders GHZ as a *de facto* avoidance area. *Id.* Further, Governor Otter points out that

there are “significant differences between the [best management practices] required by the Governor’s Plan and the RDFs required in the agencies Proposed Plan,” and that “specific RDFs either in conflict directly with the Governor’s Plan or are inconsistent because they are not contained within the Governor’s Plan.” *Id.* at 26. In many instances, the Consistency Review provides a list of the RDFs contained in the Proposed Plan that are omitted from the Governor’s Plan. *See, e.g., Id.* at 27.

BLM’s Response denial of the Governor’s recommendation to remove the RDFs that are not contained in the Governor’s Plan is only a partial response to the issues raised in the Consistency Review. The first issue is that there are significant differences between the RDFs proposed on the various types of infrastructure in the Proposed Plan and the Governor’s best management practices (BMPs). The BLM argues that they have “flexibility inherent in the application of RDFs” making the inconsistency minimal between the two plans. BLM Response at 9. If the inconsistency is minimal as the BLM contends, then adopting the Governor’s BMPs as the RDF framework would meet the “maximum extent” requirement in FLPMA.

Notably, the BLM fails entirely to address the specific inconsistencies identified by the Governor in the infrastructure specific portions of the Consistency Review. For example, in the travel management section, the Consistency Review identifies RDF 2 which states that shall be no repeated or sustained behavioral disturbance within 2 miles of a lek, where the Governor’s Plan BMP says one kilometer from the perimeter of a lek. *See Consistency Review* at 43. Additionally, the Consistency Review identified RDFs that were intentionally omitted from the list of BMPs in the Governor’s Plan. *See e.g., Fluid Mineral Development RFDs not contained in the Governor’s Plan at Consistency Review* page 43. The BLM’s failure to even acknowledge these significant inconsistencies does not meet the high standard required of the agency by FLMPA and BLM implementing regulations.

The BLM further argues that “RDFs are designed to respond to recommendations identified in the [COT Report] and will assist in meeting the primary objectives in the BLM Special Status Species policy.” BLM Response at 9. As mentioned in nearly all phases of this NEPA process, the Governor’s Plan, including the BMPs contained therein, gained concurrence with the COT Report, as acknowledged by FWS.<sup>3</sup> Certainly, if the BLM wishes to rely on the COT Reports recommendations to provide the certainty that FWS requires, then this concurrence with the Governor’s Plan should be sufficient.

Finally, the BLM argues that “[i]n light of the BLM’s Greater Sage Grouse Conservation Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of GRSG and its habitats so as to potentially reduce the need to list the species, the BLM finds it is essential to include RDFs for the GRSG in all habitat types.” BLM Response at 9. Again, the BLM has not adequately explained why their plan accomplishes the goals of certainty and conservation while the Governor’s Plan does not. Simply siting to policy guidance

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<sup>3</sup>The FWS did ask for clarification on how the Implementation Team/Commission operates to determine exceptions to development in CHZ, and IHZ, as well as mitigation of impacts, but stated that “[t]he specific action in the infrastructure element are consistent with the COT report...” *See Kelly letter* at page 6.

does not provide sufficient justification for BLM to ignore their FLPMA consistency requirements.

The Director must reconsider Governor Otter's recommendation to adopt the BMPs contained in the Governor's Plan, eliminate the RDFs from the Proposed Plan, and apply the BMPs in a manner that is consistent with the Governor's Plan.

### **III. THE AGENCIES MUST ACCEPT THE REMEDY PROPOSED BY GOVERNOR OTTER**

Governor Otter has provided the below recommendations to rectify the errors in Idaho BLM's analysis, and bring the agency in compliance with § 202(c)(9) of FLPMA. This Appeal represents the last opportunity in the administrative process for the Director to achieve a meaningful planning partnership with Idaho on this important issue. Lack of time is not a legitimate excuse to avoid negotiations with the Governor. Indeed, FLPMA's regulations provide such an opportunity – namely that, “[t]he Director *shall* accept the recommendations of the Governor(s) if he determines that they provide for a *reasonable balance* between the national interest and the State's interest. The Director shall communicate to the Governor(s) in writing and publish in the Federal Register the *reasons for his/her determination to accept or reject such Governor's recommendations.*” 43 C.F.R. 1610.3-2(e) (emphasis added).

#### **A. Adopt the Governor's recommendations in the Consistency Review**

The Governor's Consistency Review raised actual and significant inconsistencies between the Governor's Plan and the Proposed Plan. Only a few of these were addressed in the BLM Response, and where the State Director addressed the raised inconsistencies, the justification for denial was insufficient and unpersuasive. Moreover, the BLM Response entirely ignored the federalism balance of interest section. As it stands, the record demonstrates that the Governor's Plan represents a reasonable balance between the national interest and the state interest, including the agencies' multiple-use mandates, and meeting the conservation objectives outlined in the COT Report, while the Proposed Plan fails to demonstrate a reasonable balance standard.

As stated in the Governor's Consistency Review at 9, substantial weight must be given to Governor Otter's recommendations; otherwise the agencies will fail to comply with their consistency obligations under FLPMA and NFMA, effectively undermining their duties to cooperate with state governments “to the maximum extent,” and invalidating the BLM's own statement that “[t]he Governor's consistency review is an important part of the [BLM's] land use planning process.” BLM Response at 1.

The Governor's Recommendations are as follows:<sup>4</sup>

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<sup>4</sup> These recommendations were included in the Governor's Consistency Review beginning at page 61. Contrary to the agency's obligations under FLPMA, BLM did not adopt *any* of the Governor's recommendations.

***Adopt Alternative E.*** The agencies must immediately withdraw the Proposed Plan and adopt Alternative E. The Governor’s Plan is science-based and collaborative, striking a reasonable balance between federal and state interests. It is the perfect fit to meet the needs of the species in Idaho. The Proposed Plan, by contrast, is per se imbalanced because it is inconsistent with federal law as discussed above.

***Adopt Alternative E with modifications.*** Alternatively, and in the spirit of further collaboration, the agencies should withdraw the Proposed Plan, and adopt Alternative E with some of the changes agreed to in the interagency refinement process.

In October 2013, Governor Otter wrote a memorandum to Secretary Jewell outlining a process whereby the stakeholders, and based in part on the DEIS comments, could bridge the remaining differences between the Preferred Alternatives. Memorandum from Governor C.L. “Butch” Otter to Secretary Jewell (Oct. 23, 2014) (Otter DC Memo). The Governor noted in the memo that, “you [Secretary Jewell] understand the significance and exemplary model of collaboration embodied in the Idaho Roadless Rule.” Otter DC Memo, at 3. And in that vein, the memo quoted the COT Report to illustrate the need for the federal government to promote, rather than diminish, the findings in the FWS’s concurrence letter: “Due to the variability in ecological conditions and the nature of the threats across the range of the sage-grouse, developing detailed, prescriptive species or habitat actions is not possible at the range-wide scale. Specific strategies or actions necessary to achieve the following conservation objectives must be developed and implemented at the state or local level, with the involvement of all stakeholders.” Otter DC Memo, at 2; *see also*, COT Report at 31.

This was not an illusory or hypothetical offer from Governor Otter. Following this meeting, the Governor instructed his Task Force to examine a few specific items to determine whether it was possible to reach consensus on a modified-Alternative E. In April 2014, the Task Force provided recommendations to the Governor on some refinement issues, such as modifications to the map; consideration of a Conservation Area-level disturbance cap (the Task Force rejected a project- or NTT-level disturbance cap); and a more clearly-delineated exemption process in the CHZ. (FEIS, Appendix G). On July 18, 2014, OSC Administrator Dustin Miller wrote to BLM State Director Tim Murphy signaling the Governor’s willingness to adopt some of these Task Force recommendations.

Given that these efforts provided a constructive path forward for a modified-Alternative E, the last-minute National Direction stands in direct contradiction to the COT Report, the underlying record, and the collaborative process. The agencies should immediately withdraw the Proposed Plan, open a constructive dialogue with the Governor Otter’s Administration, and submit the outgrowth of that process for public review and comment.

To be acceptable, these modifications would require the following changes to the Proposed Plan:

- Elimination of the SFA proposal and associated management restrictions.
- Significant changes to the livestock grazing section with the explicit recognition that improper grazing is a secondary threat.

- Removal of the project-level disturbance cap, uniform lek buffers, and the undefined net conservation gain mitigation standard.
- Clarification or removal of certain aspects of the adaptive management construct.
- Adopt the recommendations in the Governor’s Plan to fully protect valid and existing rights.

***Provide Idaho an Exemption from the SFAs.*** The designation of SFAs is inconsistent with the Governor’s Plan because it creates a fourth habitat zone. Although the BLM Response addressed this recommendation, it did not adequately clarify why it does not consider the designations of SFAs to be a fourth tier of habitat. The Governor’s Plan designated habitat zones based on certain, consistent restrictions to be applied to subsets of GRSG habitat. Thus, the BLM Response that the designation of SFAs adds additional restrictions to a subset of habitat seems to simply define an additional habitat zone.

Further, in the Wyoming 9-Plan Proposed LUPA, the state is exempted, at least in part, from the onerous provisions of the SFA management regime. Wyoming 9-Plan; ES-12, 13. More specifically, the 7 million acres identified for “super core” designation in the Ashe Memo has been substantially reduced to 1.2 million acres. Wyoming 9-Plan; ES-4.

***Issue a Supplemental EIS.*** Notwithstanding the Governor’s strong opposition to the Proposed Plan, and if the agencies are indeed committed to this imbalanced solution, the Federal government must publicly vet the last-minute and significant National Direction through a Supplemental Environmental Impact Statement.

**B. The Director should, at a minimum, follow federal regulations prior to issuing the Record of Decision, and submit the Proposed Rule to the Office of Management and Budget (OMB).**

***Submit the Proposed Rule to OMB.*** Similarly, because the last-minute direction in the forthcoming Regional Records of Decision will likely have a staggering impact on the economies of western states and local communities, the agencies must submit this “significant” rule to OMB. Under Executive Order 12866, OMB must conduct a cost-benefit analysis of this significant rule. 80 Fed. Reg. 30,711.

**C. The BLM can remand the Consistency Review to the State Director to fulfill BLM’s consistency obligations.**

***Remand the Consistency Review to the State Director.*** The BLM’s uncharacteristically fast and woefully inadequate, cursory, and incomplete response to Governor Otter’s Consistency Review conclusively demonstrates that the BLM did not comply with its consistency obligations by meaningfully considering, analyzing and resolving the inconsistencies to the “maximum extent” as identified in the Consistency Review and Protest Letter duly filed by Governor Otter. This pattern also seems to apply to other western governors. As such, the Director must make a finding that the Proposed Plan is imbalanced and remand the consistency review process with directions to the State Director to resolve the identified inconsistencies as instructed by FLPMA.

## **CONCLUSION**

The State Director's Response did not comport with the agency's obligations under § 202(c)(9) of FLPMA. This error, if left unchecked, will create several immediate and irreparable harms to Idaho. Governor Otter's Administration stands ready to work through the issues identified in the Consistency Review and this Appeal.





Beck, Jonathan &lt;jmbeck@blm.gov&gt;

**Re: 3.1 mile lek buffer layer**

1 message

**Beck, Jonathan** <jmbeck@blm.gov>  
To: Joshua Uriarte <Joshua.Uriarte@osc.idaho.gov>  
Cc: Jonathan Beck <jmbeck@blm.gov>

Mon, Jun 15, 2015 at 7:41 AM

Josh, we don't have 3.1 miles as a layer because it is not an allocation decision and would be applied on a case-by-case basis as we determine the effects of projects during project implementation. Jon

On Fri, Jun 12, 2015 at 9:13 AM, Joshua Uriarte <Joshua.Uriarte@osc.idaho.gov> wrote:

Jon,

Do you have a layer for the 3.1 mile lek buffer for the GRSG FEIS? If so, could you send me the shapefiles. I've been getting some folks that would like to look at these layers and see how they would be affected.

Let me know,

Thank you,

**Joshua Uriarte**  
**Program Manager & Policy Advisor**  
**Governor's Office of Species Conservation**  
**304 North 8<sup>th</sup> Street, Suite 149**  
**Boise, Idaho 83702**  
**P:208-332-1556/F:208-334-2172**  
**[Species.Idaho.gov](http://Species.Idaho.gov)**

—  
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

## Brent Ralston

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**From:** Murphy, Timothy  
**Sent:** Tuesday, September 30, 2014 8:15 AM  
**To:** Peter Ditton; Jeffery Foss; Ms. Cheryle C Zwang; Brent Ralston  
**Subject:** Fwd: Western Governors' Letter re: Greater Sage-Grouse Joint Discussions with States  
**Attachments:** LTR\_GSG Rollup Mtgs\_FINAL.pdf

----- Forwarded message -----

**From:** Ellis, Steven <[sellis@blm.gov](mailto:sellis@blm.gov)>  
**Date:** Mon, Sep 29, 2014 at 4:57 PM  
**Subject:** Fwd: Western Governors' Letter re: Greater Sage-Grouse Joint Discussions with States  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>

----- Forwarded message -----

**From:** James Ogsbury <[jogsbury@westgov.org](mailto:jogsbury@westgov.org)>  
**Date:** Mon, Sep 29, 2014 at 6:20 PM  
**Subject:** Western Governors' Letter re: Greater Sage-Grouse Joint Discussions with States  
**To:** "[sellis@blm.gov](mailto:sellis@blm.gov)" <[sellis@blm.gov](mailto:sellis@blm.gov)>, "[lweldon@fs.fed.us](mailto:lweldon@fs.fed.us)" <[lweldon@fs.fed.us](mailto:lweldon@fs.fed.us)>  
**Cc:** Ryan McGinness <[ryan@nevadadc.org](mailto:ryan@nevadadc.org)>, Ethan Pittleman <[Ethan.PITTMAN@oregon.gov](mailto:Ethan.PITTMAN@oregon.gov)>, Brett Brownscombe <[brett.brownscombe@oregon.gov](mailto:brett.brownscombe@oregon.gov)>, "[john\\_blair@ios.doi.gov](mailto:john_blair@ios.doi.gov)" <[john\\_blair@ios.doi.gov](mailto:john_blair@ios.doi.gov)>, "[terri\\_johnson@ios.doi.gov](mailto:terri_johnson@ios.doi.gov)" <[terri\\_johnson@ios.doi.gov](mailto:terri_johnson@ios.doi.gov)>, "[francisco\\_carrillo@ios.doi.gov](mailto:francisco_carrillo@ios.doi.gov)" <[francisco\\_carrillo@ios.doi.gov](mailto:francisco_carrillo@ios.doi.gov)>, "[jennifer.yezak@osec.usda.gov](mailto:jennifer.yezak@osec.usda.gov)" <[jennifer.yezak@osec.usda.gov](mailto:jennifer.yezak@osec.usda.gov)>, "[d\\_m\\_ashe@fws.gov](mailto:d_m_ashe@fws.gov)" <[d\\_m\\_ashe@fws.gov](mailto:d_m_ashe@fws.gov)>, "[nkornze@blm.gov](mailto:nkornze@blm.gov)" <[nkornze@blm.gov](mailto:nkornze@blm.gov)>, "[ttidwell@fs.fed.us](mailto:ttidwell@fs.fed.us)" <[ttidwell@fs.fed.us](mailto:ttidwell@fs.fed.us)>, "Jim Lyons ([james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov))" <[james\\_lyons@ios.doi.gov](mailto:james_lyons@ios.doi.gov)>, "[j2stout@blm.gov](mailto:j2stout@blm.gov)" <[j2stout@blm.gov](mailto:j2stout@blm.gov)>, "[Edwin\\_Roberson@blm.gov](mailto:Edwin_Roberson@blm.gov)" <[Edwin\\_Roberson@blm.gov](mailto:Edwin_Roberson@blm.gov)>

Dear Mr. Ellis and Ms. Weldon,

Attached please find a letter from Governor Hickenlooper (CO) and Governor Mead (WY), Co-Chairs of the State-Federal Sage-Grouse Task Force, on behalf of the Western Governors, regarding joint discussions with impacted Western states regarding the greater sage-grouse (GSG) conservation.

In the meantime, please do not hesitate to contact me should you have questions or require further information.

Respectfully,

James D. Ogsbury

Executive Director

ph: 303-623-9378

*Nevada Gov. **Brian Sandoval**, Chairman of the Western Governors' Association, invites you to attend the 2014 Winter Meeting December 6-7 in Las Vegas, Nevada and the 2015 Annual Meeting, June 24-26, 2015 in Lake Tahoe, Nevada. Information will be posted as it becomes available at [www.westgov.org](http://www.westgov.org).*

--

Timothy M Murphy  
Idaho State Director  
Bureau of Land Management  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270



## WESTERN GOVERNORS' ASSOCIATION

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[www.westgov.org](http://www.westgov.org)

September 29, 2014

Mr. Steve Ellis  
Deputy Director, Operations  
Bureau of Land Management  
1849 C Street NW, Rm. 5665  
Washington D.C. 20240

Ms. Leslie Weldon  
Deputy Chief, National Forest System  
U.S. Forest Service  
1400 Independence Ave., SW  
Washington, D.C. 20250-1111

Dear Mr. Ellis and Ms. Weldon:

In July, 2014, you sent a memorandum to Bureau of Land Management (BLM) state directors and U.S. Forest Service (USFS) regional foresters on greater sage-grouse (GSG) conservation. In that document, you made a commitment to sit down with impacted Western states for joint discussions to assess how combined state and federal efforts on private, state and federal lands can address threats that influence the vitality of the GSG. This need was first identified at the June 12, 2014 State-Federal Sage-Grouse Task Force meeting. However, it was not until Sept. 19, 2014 that Ed Roberson from BLM proposed dates and times for these discussions.

As Governors, we feel that federal coordination with the states in this planning process is being ineffectually approached and treated more as an afterthought by BLM and USFS at the D.C. level. We are displeased regarding how states are being consulted with respect to an issue of such overriding importance. Contacting the states for planning coordination at such a late stage does not reflect an objective to work in authentic partnership to address GSG conservation.

Western Governors support early, meaningful and substantive state involvement in the development and implementation of federal plans, particularly when the GSG remains a state managed species and states are working to help their federal partners to improve management of federal lands within their states' borders (Western Governors' Association (WGA) Policy Resolution 2014-09 [Respecting State Authority and Expertise](#)). Further, the states need clear, concise input from federal agencies about how to shape state plans so as to eliminate perceived threats to species and the need for a listing under the Endangered Species Act (WGA Policy Resolution 2014-11 [Species of Concern and Candidate Species](#)).

We consent to participate in the Rocky Mountain and Great Basin planning conversations scheduled for the coming weeks, but only on the condition that

Mr. Steve Ellis  
Ms. Leslie Weldon  
September 29, 2014  
Page Two

additional one-on-one meetings with individual states are scheduled and occur before the BLM and USFS make any final decisions relative to GSG plans. The goals and objectives for the Rocky Mountain and Great Basin planning conversations and these individual meetings should be mutually agreed upon by the state and federal agencies in advance. Continued lack of involvement and coordination with the states will only further exacerbate disjunct federal and state plans with regard to conservation of the GSG and future land use development.

We expect that all 11 Governors representing GSG states will exercise their prerogative under the Federal Land Policy and Management Act and the National Forest Management Act to review BLM and USFS plans to determine if they are consistent with state and local plans, policies and programs. If meaningful consultation does occur between your agencies and individual states, the odds that those reviews will be positive are greatly enhanced.

We look forward to the engagement of each of the individual GSG states to get this process back on track.

Sincerely,



John Hickenlooper  
Governor, State of Colorado  
Co-Chair, State-Federal  
Sage-Grouse Task Force



Matt Mead  
Governor, State of Wyoming  
Co-Chair, State-Federal  
Sage-Grouse Task Force

cc: Honorable Brian Sandoval, Governor, State of Nevada and Chairman, WGA  
Honorable John Kitzhaber, Governor, State of Oregon and Vice Chairman, WGA  
Honorable Sally Jewell, Secretary, U.S. Department of the Interior  
Honorable Tom Vilsack, Secretary, U.S. Department of Agriculture  
Dan Ashe, Director, U.S. Fish and Wildlife Service  
Neil Kornze, Director, Bureau of Land Management  
Tom Tidwell, Chief, U.S. Forest Service  
Jim Lyons, Counselor to the Assistant Secretary, U.S. Department of the Interior  
Ed Roberson, Assistant Director, Renewable Resources and Planning, Bureau of Land Management  
Joe Stout, Division Chief, Decision Support, Planning, and NEPA, Bureau of Land Management

**Brent Ralston**

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**From:** Murphy, Timothy  
**Sent:** Tuesday, October 07, 2014 3:13 PM  
**To:** Peter Ditton; Jeffery Foss; Kurt Wiedenmann; Brent Ralston; Ms. Cheryle C Zwang  
**Subject:** Fwd: Sage Grouse Memo  
**Attachments:** BLM\_FS\_Letter (3).pdf

----- Forwarded message -----

From: **Ellis, Steven** <[sellis@blm.gov](mailto:sellis@blm.gov)>  
Date: Tue, Oct 7, 2014 at 8:14 AM  
Subject: Sage Grouse Memo  
To: Amy Lueders <[alueders@blm.gov](mailto:alueders@blm.gov)>, Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Michael Haske <[mhaske@blm.gov](mailto:mhaske@blm.gov)>, Jeff Foss <[jefffoss@yahoo.com](mailto:jefffoss@yahoo.com)>, Jamie E Connell <[jconnell@blm.gov](mailto:jconnell@blm.gov)>, Donald Simpson <[dsimpson@blm.gov](mailto:dsimpson@blm.gov)>, Ruth Welch <[rwelch@blm.gov](mailto:rwelch@blm.gov)>, Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Mark Nielsen <[manielson@blm.gov](mailto:manielson@blm.gov)>, Kathryn Stangl <[kstangl@blm.gov](mailto:kstangl@blm.gov)>, Celia Boddington <[cbodding@blm.gov](mailto:cbodding@blm.gov)>, Craig Leff <[cleff@blm.gov](mailto:cleff@blm.gov)>, James Kenna <[jkenna@blm.gov](mailto:jkenna@blm.gov)>

Hello,

Attached is the BLM-FS Sage Grouse Memo.

Steve

--  
Timothy M Murphy  
Idaho State Director  
Bureau of Land Management  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
1849 C Street, NW  
Washington, DC 20240



United States Department of Agriculture  
U.S. FOREST SERVICE  
1400 Independence Avenue, SW  
Washington, DC 20250

The Honorable John Hickenlooper, Co-Chair  
The Honorable Matt Mead, Co-Chair  
State-Federal Sage-Grouse Task Force  
Western Governors' Association  
1600 Broadway, Suite 1700  
Denver, Colorado 80202

Dear Governors Hickenlooper and Mead:

Thank you for your letter of September 29 regarding our collaborative efforts to conserve Greater Sage-Grouse habitat. We appreciate your input on this important issue and want to let you know that we value our partnership with you and each of the Governors as we work together both locally and nationally to ensure the conservation of the Greater Sage-Grouse. We recognize how much is at stake and the importance of our ongoing dialogue.

Since 2011, we have worked cooperatively with the states in developing conservation plans. The states played a critical role in helping to develop the Conservation Objectives Team (COT) report that provides the foundation for guiding our collective conservation efforts to conserve the Greater Sage-Grouse and its habitat.

We hope that our work together will focus on outcomes that will benefit sage grouse conservation and allow for sustainable land use activities where the landscape can best support it. We look forward to continuing to work with you on the planning and implementation of the Greater Sage-Grouse strategy. Together, our planning effort will help us maintain Western economies, protect wildlife that rely on sagebrush habitat, and promote balance between open space and development.

Thank you again for your letter and the opportunity to continue our collaborative efforts to develop the range wide conservation necessary to avoid the need to list the species and protect Western economies. We look forward to our Task Force meeting in Denver and subsequent one-on-one meetings with individual states.

Sincerely,

Handwritten signature of Steven A. Ellis.

Steven A. Ellis  
Deputy Director, Operations  
Bureau of Land Management

Handwritten signature of Leslie A. C. Weldon.

Leslie A. C. Weldon  
Deputy Chief, National Forest System  
U.S. Forest Service

**Brent Ralston**

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**From:** Wiedenmann, Kurt  
**Sent:** Monday, March 17, 2014 8:35 AM  
**To:** BLM\_ID\_SO\_LLID931000  
**Subject:** Fwd: Idaho Legis. Hearing: Sage grouse--yesterday

fyi...a short from Jeff concerning his testimony at last Fridays Federal Lands Interim Committee hearing.

----- Forwarded message -----

**From:** Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>  
**Date:** Sat, Mar 15, 2014 at 10:18 AM  
**Subject:** Idaho Legis. Hearing: Sage grouse--yesterday  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>  
**Cc:** Cheryle Zwang <[czwang@blm.gov](mailto:czwang@blm.gov)>, Kurt R Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, Nancy Haug <[nhaug@blm.gov](mailto:nhaug@blm.gov)>, Peter Ditton <[pditton@blm.gov](mailto:pditton@blm.gov)>

Tim

Overall hearing with the Federal Lands Interim Committee went well. Laura Skaer of the Mining Asso had strong criticism of the FWS and BLMs planning process and said a listing under ESA is preferred to BLMs RMP amendments in process. Kathleen Clarke had concerns with Utah BLMs lack of consideration of the Utah Govs alternative and was highly critical of The FWS/Dan Ashe and what she said was Dan's repeated reference to a listing with a 4d rule and a possible outcome that could help the states. Mike Carrier of the FWS provided an overview their process for considering BLMs RMPs and spoke highly of the Gov Otters alternative and the BLM collaborative process. I provided an overview of the co preferred alternatives and next steps. Senator Bart Davis expressed concerns that BLM may just pick the most restrictive measures from the two co preferred alternatives. I reiterated the importance of the cooperative agencies role in the process, including the State of Idaho and the Counties, and stated our goal is to get conservation in place such that listing under ESA is unnecessary and the sage grouse remain a State managed species.

The earlier panel included Jim Caswell addressing the Idaho Roadless Rule and the successful collaboration between the FS and State.

Jeff

Sent from my iPhone

--  
**Kurt Wiedenmann**



Resources and Science Branch Chief  
BLM - Idaho State Office  
208-373-3813

RouteName	Year	Date	Total Males	Number of Leks Counted	Number of active leks	20285	20285a
Cow Creek	1996	01-Jan-96	45	3	3	15	27
Cow Creek	1997	01-Jan-97	84	4	4	19	22
Cow Creek	1998	01-Jan-98	90	4	3	20	19
Cow Creek	1999	01-Jan-99	99	4	3	29	22
Cow Creek	2000	01-Jan-00	89	4	3	27	21
Cow Creek	2001	01-Jan-01	50	4	3	18	6
Cow Creek	2002			0			
Cow Creek	2003	01-Jan-03	70	4	3	27	19
Cow Creek	2004			0			
Cow Creek	2005			0			
Cow Creek	2006	01-Jan-06	28	1	1	28	
Cow Creek	2007	01-Jan-07	32	3	2	10	
Cow Creek	2008	05-Apr-08	36	4	2	11	0
Cow Creek	2009	23-Apr-09	61	4	3	12	7
Cow Creek	2010	18-Apr-10	58	3	2		19
Cow Creek	2011	22-Apr-11	45	3	2		13
Cow Creek	2012	28-Apr-12	13	3	1		13
Cow Creek	2013	18-Apr-13	25	3	2	10	
Cow Creek	2014	28-Apr-14	45	4		12	3

*\*Prior to 2008 individual counts and dates were not maintained. The numbers for those years represent the maximum year. The counts were arbitrarily assigned a date of January 1st for incorporation into the database.*

20515	20520	Avg Males	RouteName	Year	Date	Total Males	Number of Leks Counted
	3	15	Brown's Creek	1996		0	0
38	5	21	Brown's Creek	1997	01-Jan-97	12	2
51	0	22.5	Brown's Creek	1998	01-Jan-98	15	3
48	0	24.75	Brown's Creek	1999	01-Jan-99	11	3
41	0	22.25	Brown's Creek	2000	01-Jan-00	24	2
26	0	12.5	Brown's Creek	2001	01-Jan-01	20	2
			Brown's Creek	2002	01-Jan-02	15	3
24	0	17.5	Brown's Creek	2003	01-Jan-03	26	3
			Brown's Creek	2004			0
			Brown's Creek	2005	01-Jan-05	33	4
		28	Brown's Creek	2006	01-Jan-06	73	4
22	0	10.66667	Brown's Creek	2007	01-Jan-07	46	4
25	0	9	Brown's Creek	2008	22-Apr-08	9	4
42	0	15.25	Brown's Creek	2009	23-Apr-09	14	4
39	0	19.33333	Brown's Creek	2010	17-Apr-10	12	5
32	0	15.00	Brown's Creek	2011	27-Apr-11	30	5
0	0	4.333333	Brown's Creek	2012	28-Apr-12	42	5
15	0	8.333333	Brown's Creek	2013	12-Apr-13	34	5
30	0	11.25	Brown's Creek	2014	10-Apr-14	28	5

*mum number of males counted for each lek in that route for that*

Number of active leks	20189	20190	20196	20198	20664	Avg Males	RouteName	Year
							Oreana	1996
2	2		10			6	Oreana	1997
2	0		12	3		5	Oreana	1998
2	0		9	2		3.666667	Oreana	1999
1	0		24			12	Oreana	2000
1	0		20			10	Oreana	2001
2	5	0	10			5	Oreana	2002
2	11	0	15			8.666667	Oreana	2003
							Oreana	2004
3	4	0	22	7		8.25	Oreana	2005
3	23	0	27		23	18.25	Oreana	2006
3	15	0	16		15	11.5	Oreana	2007
1	0	0	0		9	2.25	Oreana	2008
1	0		6	0	8	3.5	Oreana	2009
1	0	0	4	0	8	2.4	Oreana	2010
2	0	0	16	0	14	6	Oreana	2011
2	0	0	23	0	19	8.4	Oreana	2012
3	3	0	19	0	12	6.8	Oreana	2013
2	0	0	17	0	11	5.6	Oreana	2014

Date	Total Males	Number of Leks Counted	Number of active leks	20197	20505	20508	20705
01-Jan-96	33	2	2	10	23		
01-Jan-97	23	2	2	10	13		
01-Jan-98	42	3	3	12	16	14	
01-Jan-99	79	3	3	32	29	18	
01-Jan-00	59	2	2	16	43		
01-Jan-01	100	3	3	21	53	26	
01-Jan-02	61	3	3	26	33	2	
01-Jan-03	88	3	3	23	54	11	
01-Jan-04	75	3	3	25	43	7	
01-Jan-05	98	3	3	33	64	1	
01-Jan-06	90	3	2	29	61	0	
01-Jan-07	54	3	2	19	35	0	
10-Apr-08	51	3	3	17	29		5
12-Apr-09	40	4	4	11	18	0	11
26-Apr-10	134	5	4	32	26	0	5
24-Apr-11	115	5	4	34	33	0	7
12-Apr-12	105	5	4	35	28	0	4
23-Apr-13	95	5	4	23	22	0	6
14-Apr-14	82	5	3	17	24	0	0

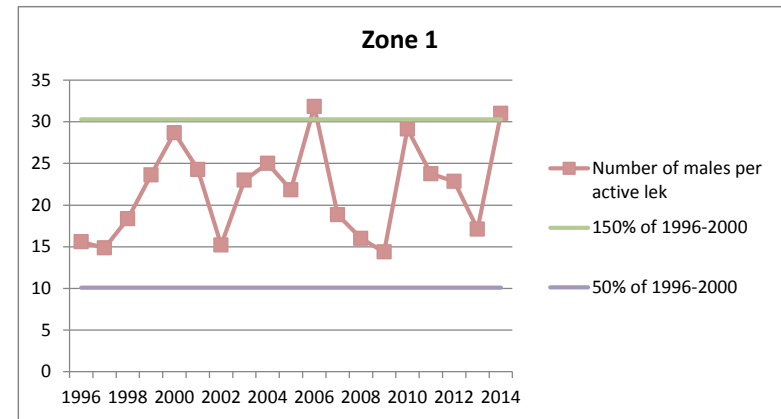
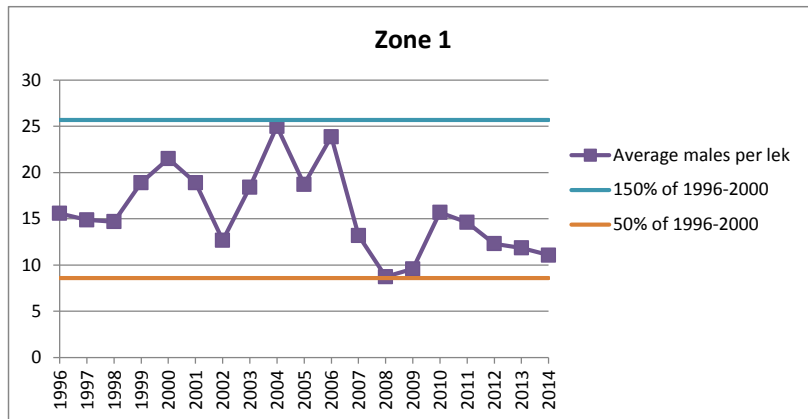
20642 (new 2010)	Avg Males	Total Males	Number of leks counted	Males per Lek	Number of active leks	Number of males per active lek
	16.5	78	5	15.60	5	15.60
	11.5	119	8	14.88	8	14.88
	14	147	10	14.70	8	18.38
	26.33333	189	10	18.90	8	23.63
	29.5	172	8	21.50	6	28.67
	33.33333	170	9	18.89	7	24.29
	20.33333	76	6	12.67	5	15.20
	29.33333	184	10	18.40	8	23.00
	25	75	3	25.00	3	25.00
	32.66667	131	7	18.71	6	21.83
	30	191	8	23.88	6	31.83
	18	132	10	13.20	7	18.86
	17	96	11	8.73	6	16.00
	10	115	12	9.58	8	14.38
40	15.75	204	13	15.69	7	29.14
41	23	190	13	14.62	8	23.75
38	21	160	13	12.31	7	22.86
44	19	154	13	11.85	9	17.11
41	16.4	155	14	11.07	5	31.00

Year	Total Males	Number of leks counted	Average males per lek	150% of 1996-2000	50% of 1996-2000	Number of active leks	Number of males per active lek	150% of 1996-2000	50% of 1996-2000
1996	78	5	15.60	25.7	8.6	5	15.60	30.3	10.1
1997	119	8	14.88	25.7	8.6	8	14.88	30.3	10.1
1998	147	10	14.70	25.7	8.6	8	18.38	30.3	10.1
1999	189	10	18.90	25.7	8.6	8	23.63	30.3	10.1
2000	172	8	21.50	25.7	8.6	6	28.67	30.3	10.1
2001	170	9	18.89	25.7	8.6	7	24.29	30.3	10.1
2002	76	6	12.67	25.7	8.6	5	15.20	30.3	10.1
2003	184	10	18.40	25.7	8.6	8	23.00	30.3	10.1
2004	75	3	25.00	25.7	8.6	3	25.00	30.3	10.1
2005	131	7	18.71	25.7	8.6	6	21.83	30.3	10.1
2006	191	8	23.88	25.7	8.6	6	31.83	30.3	10.1
2007	132	10	13.20	25.7	8.6	7	18.86	30.3	10.1
2008	96	11	8.73	25.7	8.6	6	16.00	30.3	10.1
2009	115	12	9.58	25.7	8.6	8	14.38	30.3	10.1
2010	204	13	15.69	25.7	8.6	7	29.14	30.3	10.1
2011	190	13	14.62	25.7	8.6	8	23.75	30.3	10.1
2012	160	13	12.31	25.7	8.6	7	22.86	30.3	10.1
2013	154	13	11.85	25.7	8.6	9	17.11	30.3	10.1
2014	155	14	11.07	25.7	8.6	5	31.00	30.3	10.1

**Average males per lek 1996-2000**      **17.1**  
**50%**      **8.6**  
**150%**      **25.7**  
**Current 3-year average**      **11.7**

**Average males per active lek 1996-2000**      **20.2**  
**50%**      **10.1**  
**150%**      **30.3**  
**Current 3-year average**      **23.7**

**Current 3-year average is within 50% and 150% of the 1996-2000 average  
DATA INDICATE A RESTRICTIVE SEASON**



**Table 4-14 from State Plan**

Option	3-year running average of lek counts	Days	Daily Bag
Closed	Less than 100 males observed Lek counts are less than 50% of 1996-2000 average counts Lek data are not gathered for the population	0	0
Restrictive	Lek counts are between 50% and 150% of the 1996-2000 average	7	1
Standard	Lek counts exceed 150% of the 1996-2000 average	23	2



RouteName	Year	Date	Total Males	Number of Leks Counted	Number of active leks	20238 (added 2012)
Rocky Knoll	1996	01-Jan-96	28	2	1	
Rocky Knoll	1997	01-Jan-97	24	1	1	
Rocky Knoll	1998	01-Jan-98	23	1	1	
Rocky Knoll	1999	01-Jan-99	32	1	1	
Rocky Knoll	2000	01-Jan-00	68	4	4	
Rocky Knoll	2001	01-Jan-01	42	1	1	
Rocky Knoll	2002	01-Jan-02	54	1	1	
Rocky Knoll	2003	01-Jan-03	72	1	1	
Rocky Knoll	2004	01-Jan-04	55	1	1	
Rocky Knoll	2005	01-Jan-05	204	6	6	
Rocky Knoll	2006	01-Jan-06	154	6	6	
Rocky Knoll	2007	01-Jan-07	108	6	6	
Rocky Knoll	2008	28-Apr-08	73	5	4	
Rocky Knoll	2009	16-Apr-09	91	6	5	
Rocky Knoll	2010	26-Apr-10	153	7	4	7
Rocky Knoll	2011	30-Apr-11	198	7	6	12
Rocky Knoll	2012	23-Apr-12	146	8	6	18
Rocky Knoll	2013	27-Apr-13	126	8	5	15
Rocky Knoll	2014	23-Apr-14	130	8	5	12

*\*Prior to 2008 individual counts and dates were not maintained. The numbers for those years represent the mean year. The counts were arbitrarily assigned a date of January 1st for incorporation into the database.*

20250	20367	20478	20479	20674	20682	20814 (new 2011)	Avg Males	RouteName
	28		0				14	Roland Road
	24						24	Roland Road
	23						23	Roland Road
	32						32	Roland Road
5	34	1	28				17	Roland Road
	42						42	Roland Road
	54						54	Roland Road
	72						72	Roland Road
	55						55	Roland Road
14	89	22	53	11	15		34	Roland Road
25	75	9	26	8	11		25.66667	Roland Road
19	37	5	35	5	7		18	Roland Road
8	32	5	28		0		14.6	Roland Road
2	48	1	35	5	0		15.16667	Roland Road
0	81	4	61	0	0		21.85714	Roland Road
10	90	4	75		0	7	28.28571	Roland Road
3	58	3	58	0	0	6	18.25	Roland Road
0	60	2	43	0	0	6	15.75	Roland Road
0	67	3	45	0	0	3	16.25	Roland Road

Maximum number of males counted for each lek in that route for that

Year	Date	Total Males	Number of Leks Counted	Number of active leks	20206	20254	20259
1996				0			
1997				0			
1998	01-Jan-98	38	3	3	8	15	15
1999	01-Jan-99	38	2	2		21	17
2000	01-Jan-00	50	3	3	14	15	21
2001	01-Jan-01	53	2	2		21	32
2002	01-Jan-02	60	3	3	21	17	22
2003	01-Jan-03	100	3	3	55	24	21
2004	01-Jan-04	117	3	3	57	41	19
2005	01-Jan-05	136	3	3	64	57	15
2006	01-Jan-06	94	3	3	42	36	16
2007	01-Jan-07	80	3	3	33	31	16
2008	07-Apr-08	39	3	3	12	19	8
2009	08-May-09	44	3	2	15	29	0
2010	24-Apr-10	43	3	3	13	22	8
2011	20-Apr-11	65	3	3	11	46	8
2012	17-Apr-12	59	3	3	10	42	7
2013	18-Apr-13	51	3	3	4	36	11
2014	29-Apr-14	77	4	4	6	49	20

20259a	Avg Males	RouteName	Year	Date	Total Males	Number of Leks Counted
		Sheep Creek	1996			0
		Sheep Creek	1997			0
	12.66667	Sheep Creek	1998	01-Jan-98	2	1
	19	Sheep Creek	1999	01-Jan-99	52	6
	16.66667	Sheep Creek	2000	01-Jan-00	82	6
	26.5	Sheep Creek	2001	01-Jan-01	44	6
	20	Sheep Creek	2002	01-Jan-02	41	6
	33.33333	Sheep Creek	2003	01-Jan-03	52	6
	39	Sheep Creek	2004	01-Jan-04	53	6
	45.33333	Sheep Creek	2005	01-Jan-05	94	6
	31.33333	Sheep Creek	2006	01-Jan-06	145	6
	26.66667	Sheep Creek	2007	01-Jan-07	139	6
	13	Sheep Creek	2008	17-Apr-08	95	6
	14.66667	Sheep Creek	2009	27-Apr-09	95	6
	14.33333	Sheep Creek	2010	10-Apr-10	100	6
	21.66667	Sheep Creek	2011	22-Apr-11	83	6
	19.66667	Sheep Creek	2012	16-Apr-12	81	6
	17	Sheep Creek	2013	17-Apr-13	68	6
2	19.25	Sheep Creek	2014	03-Apr-14	64	6

Number of active leks	20211	20392	20393	20542	20544	20545	Avg Males
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				2			2
6	11	9	6	6	19	1	8.666667
6	12	15	8	22	20	5	13.666667
5	12	5	4	3	20	0	7.333333
2	0	17	0	0	24	0	6.833333
4	20	2	0	6	24	0	8.666667
4	19	1	0	8	25	0	8.833333
5	37	2	0	14	38	3	15.666667
6	59	5	14	19	38	10	24.166667
6	54	3	17	31	29	5	23.166667
6	51	1	2	19	18	4	15.833333
5	42	0	12	22	13	6	15.833333
5	52	0	7	24	9	8	16.666667
5	44	0	4	26	5	4	13.833333
5	39	0	8	21	11	2	13.5
5	39	0	2	14	11	2	11.333333
5	21	8	10	12	13	0	10.666667

RouteName	Year	Date	Total Males	Number of Leks Counted	Number of active leks	20376
Wickahoney	1996	01-Jan-96	27	1	1	27
Wickahoney	1997	01-Jan-97	31	1	1	31
Wickahoney	1998	01-Jan-98	27	2	2	26
Wickahoney	1999	01-Jan-99	19	1	1	19
Wickahoney	2000	01-Jan-00	19	1	1	19
Wickahoney	2001	01-Jan-01	24	1	1	24
Wickahoney	2002	01-Jan-02	25	1	1	25
Wickahoney	2003	01-Jan-03	48	1	1	48
Wickahoney	2004	01-Jan-04	63	2	1	63
Wickahoney	2005	01-Jan-05	99	1	1	99
Wickahoney	2006	01-Jan-06	115	2	2	102
Wickahoney	2007	01-Jan-07	83	2	2	78
Wickahoney	2008	10-Apr-08	41	1	1	41
Wickahoney	2009	08-Apr-09	34	2	2	31
Wickahoney	2010	15-Apr-10	31	1	1	31
Wickahoney	2011	19-Apr-11	43	2	2	41
Wickahoney	2012	25-Mar-12	38	2	2	36
Wickahoney	2013	07-Apr-13	30	2	2	28
Wickahoney	2014	25-Mar-14	37	2	2	34

20604	Avg Males	RouteName	Year	Date	Total Of MaleCount	Number of Leks Counted
	27					
	31					
1	13.5					
	19					
	19					
	24					
	25					
	48					
0	31.5					
	99					
13	57.5					
5	41.5					
	41					
3	17					
	31					
2	21.5	Big Jack's Creek	2011	22-Apr-11	114	5
2	19	Big Jack's Creek	2012	01-May-12	116	5
2	15	Big Jack's Creek	2013	02-Apr-13	98	4
3	18.5	Big Jack's Creek	2014	12-Apr-14	103	4

Big Jack's Creek was a new lek route in 2010. It was not included in season

Number of active leks	20581	20584	20589	20669	20815	Avg Males	Total males	Number of leks counted
							55	3
							55	2
							90	7
							141	10
							219	14
							163	10
							180	11
							272	11
							288	12
							533	16
							508	17
							410	17
							248	15
							264	17
							327	17
4	25	59	0	12	18	22.8	503	23
4	38	37	0	26	15	23.2	440	24
4	13	44		25	16	24.5	373	23
4	22	45		24	12	25.75	411	24

---

setting in 2010 and 2011, but it is included in the 2012 analysis.



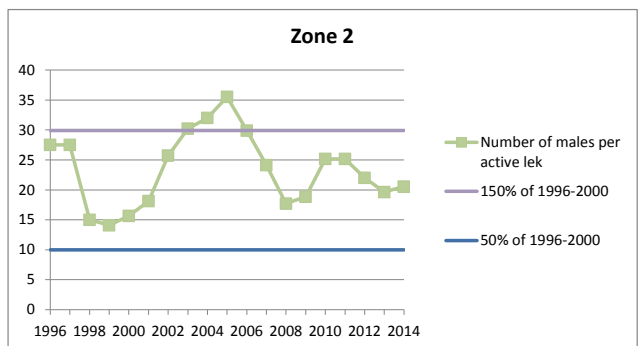
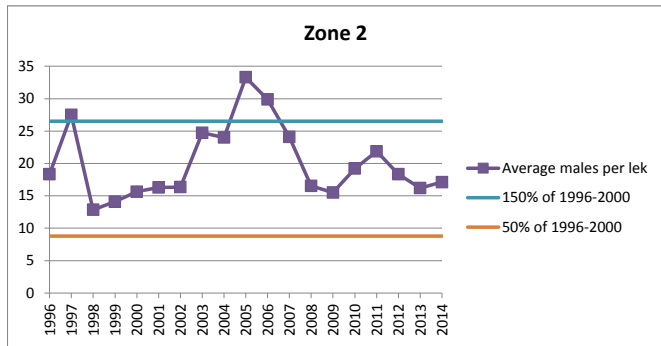
Average males per lek	Number of active leks	Number of males per active lek	w/o Jacks Cr
18.33	2	27.5	
27.50	2	27.5	
12.86	6	15	
14.10	10	14.1	
15.64	14	15.64285714	
16.30	9	18.11111111	
16.36	7	25.71428571	
24.73	9	30.22222222	
24.00	9	32	
33.31	15	35.53333333	
29.88	17	29.88235294	
24.12	17	24.11764706	
16.53	14	17.71428571	
15.53	14	18.85714286	
19.24	13	25.15384615	
21.87	20	25.15	389
18.33	20	22	324
16.22	19	19.63157895	275
17.13	20	20.55	

Year	Total males	Number of leks counted	Average males per lek	150% of 1996-2000	50% of 1996-2000	Number of active leks	Number of males per active lek	150% of 1996-2000	50% of 1996-2000
1996	55	3	18.33	26.5	8.8	2	27.50	29.9	10
1997	55	2	27.50	26.5	8.8	2	27.50	29.9	10
1998	90	7	12.86	26.5	8.8	6	15.00	29.9	10
1999	141	10	14.10	26.5	8.8	10	14.10	29.9	10
2000	219	14	15.64	26.5	8.8	14	15.64	29.9	10
2001	163	10	16.30	26.5	8.8	9	18.11	29.9	10
2002	180	11	16.36	26.5	8.8	7	25.71	29.9	10
2003	272	11	24.73	26.5	8.8	9	30.22	29.9	10
2004	288	12	24.00	26.5	8.8	9	32.00	29.9	10
2005	533	16	33.31	26.5	8.8	15	35.53	29.9	10
2006	508	17	29.88	26.5	8.8	17	29.88	29.9	10
2007	410	17	24.12	26.5	8.8	17	24.12	29.9	10
2008	248	15	16.53	26.5	8.8	14	17.71	29.9	10
2009	264	17	15.53	26.5	8.8	14	18.86	29.9	10
2010	327	17	19.24	26.5	8.8	13	25.15	29.9	10
2011	503	23	21.87	26.5	8.8	20	25.15	29.9	10
2012	440	24	18.33	26.5	8.8	20	22.00	29.9	10
2013	373	23	16.22	26.5	8.8	19	19.63	29.9	10
2014	411	24	17.13	26.5	8.8	20	20.55	29.9	10

10 Big Jack's Creek was a new lek route in 2010. It was not included in season setting in 2010 and 2011, but it is included in the 2012 analysis.

<b>Average males per lek 1996-2000</b>	<b>17.7</b>	<b>Average males per active lek 1996-2000</b>	<b>19.9</b>	<b>Average males per lek 1999-2000</b>	<b>14.87</b>
<b>50%</b>	<b>8.8</b>	<b>50%</b>	<b>10.0</b>	<b>50%</b>	<b>7.4</b>
<b>150%</b>	<b>26.5</b>	<b>150%</b>	<b>29.9</b>	<b>150%</b>	<b>22.3</b>
<b>Current 3-year average</b>	<b>17.2</b>	<b>Current 3-year average</b>	<b>20.7</b>	<b>Current 3-year average</b>	<b>17.2</b>

Current 3-year average is between 50% and 150% of 1996-2000 average  
**DATA INDICATE A RESTRICTIVE SEASON**



**Table 4-14 from State Plan**

Option	3-year running average of lek counts	Days	Daily Bag
Closed	Less than 100 males observed Lek counts are less than 50% of 1996-2000 average counts Lek data are not gathered for the population	0	0
Restrictive	Lek counts are between 50% and 150% of the 1996-2000 average	7	1
Standard	Lek counts exceed 150% of the 1996-2000 average	23	2

**Brent Ralston**

---

**From:** Karen  
**Sent:** Wednesday, June 25, 2014 4:11 PM  
**To:** econtreras@pheasantsforever.org; ajurquidi@msn.com; ann.moser@idfg.idaho.gov; atalsma@tnc.org; bcattle@att.net; bent0864@vandals.uidaho.edu; bevans@idl.idaho.gov; bhuff2@speedyquick.net; bill.bosworth@idfg.idaho.gov; bjost@blm.gov; boren@stephen.net; branch@safelink.net; Brandon\_knapton@blm.gov; brichardsbs@aol.com; bschoeberl@blm.gov; bunnasch@tnc.org; carl.rudeen@mountainhome.af.mil; ccgibson@citlink.net; Chris\_reighn@fws.gov; chrisfelty@gmail.com; chukar28@icloud.com; collett@wildblue.net; d\_lafayette48@yahoo.com; darcy.helmick@simplot.com; delwyne.trefz@swc.idaho.gov; dfrench@idl.idaho.gov; djohnson@idl.idaho.gov; dkemner@idfg.idaho.gov; gogrimm@mountainvisions.com; hmeyr@webtv.net; jackson@hughes.net; janna\_3000@yahoo.com; Jason\_Pyron@fws.gov; Jason\_Sutter@blm.gov; jbaum@uwalumni.com; jburquidi@msn.com; John.Biar@agri.idaho.gov; jon@owyheeavalanche.com; jrachael@idfg.idaho.gov; jrobison@idahoconservation.org; jromero@owyheeair.com; jvcwma@qwestoffice.net; kraberasturi@yahoo.com; Kristin\_lohr@fws.gov; krm@gscwireless.net; Lara\_R\_Rozzell@nps.gov; lchandler@blm.gov; lindle.offenbacker@id.usda.gov; lokeson@blm.gov; mbyrne@blm.gov; mendijaca@yahoo.com; michelle.common@idfg.idaho.gov; milleronglen@aol.com; mspicer@blm.gov; Norba@clearwire.net; OCNRC DIR@aol.com; paulnett2001@yahoo.com; pharrington@tu.org; Pilcher@congervet.com; pnielsen@house.idaho.gov; pwaldon@merrittbros.com; pwaldon@msn.com; rayola\_1@msn.com; rick.raymondi@idwr.idaho.gov; riddleranches@yahoo.com; rluke@idl.idaho.gov; ron.brooks@id.usda.gov; ron.hartzmänn@ars.usda.gov; Sankteki@isu.edu; scooter401962@yahoo.com; scottj@uidaho.edu; shrj@juno.com; stephenvgoddard@yahoo.com; steve.nadeau@idfg.idaho.gov; sv@centurylink.net; Tate.Walters@id.usda.gov; thaneb73@hotmail.com; todd.k.grimm@aphis.usda.gov; verti@congervet.com; wmbpratt@yahoo.com; Y2ranch@aol.com; bralston@blm.gov; sdouglas@idl.idaho.gov; pseymour@idl.idaho.gov; nmhill@mindspring.com; clyons714@gmail.com; s.iflybye@gmail.com; jholbrook@vandals.uidaho.edu; niem3790@vandals.uidaho.edu; stacy.thornbrugh@id.usda.gov; mcook@blm.gov; jd@uidaho.edu; tthrift@blm.gov; kathleen\_hendricks@fws.gov; amondor@idl.idaho.gov; mnmcgee@blm.gov; psalant@uidaho.edu; laura.a.schnapp@state.or.us; mark.hansen@cpsagu.com; SolutionsForBirdConservation@gmail.com; idhoundsman@q.com  
**Subject:** Fw: Funding for sage-grouse habitat projects

----- Original Message -----

**From:** [Kemner, Don](#)  
**Sent:** Wednesday, June 25, 2014 3:59 PM  
**Subject:** Funding for sage-grouse habitat projects

Local Working Groups;

Idaho Fish and Game and the Governor's Office of Species Conservation has some funds to do sage-grouse habitat projects. Local Working Groups should consider ideas for habitat improvement projects (e.g. fire rehab, fence marking, seedings, wet meadow restoration, juniper removal, etc.).

Please contact me if your LWG has ideas for habitat projects in your area.

Thank you,

Don Kemner  
Wildlife Program Coordinator  
Idaho Department of Fish and Game  
P.O. Box 25, 600 S. Walnut Street  
Boise, ID 83707  
(208) 287-2748 office



<http://fishandgame.idaho.gov/75th/>

**Brent Ralston**

---

**From:** Karen  
**Sent:** Monday, June 23, 2014 11:10 AM  
**To:** econtreras@pheasantsforever.org; ajurquidi@msn.com; ann.moser@idfg.idaho.gov; atalsma@tnc.org; bcattle@att.net; bent0864@vandals.uidaho.edu; bevans@idl.idaho.gov; bhuff2@speedyquick.net; bill.bosworth@idfg.idaho.gov; bjost@blm.gov; boren@stephen.net; branch@safelink.net; Brandon\_knapton@blm.gov; brichardsbs@aol.com; bschoeberl@blm.gov; bunnasch@tnc.org; carl.rudeen@mountainhome.af.mil; ccgibson@citlink.net; Chris\_reighn@fws.gov; chrisfelty@gmail.com; chukar28@icloud.com; collett@wildblue.net; d\_lafayette48@yahoo.com; darcy.helmick@simplot.com; delwyne.trefz@swc.idaho.gov; dfrench@idl.idaho.gov; djohnson@idl.idaho.gov; dkemner@idfg.idaho.gov; gogrimm@mountainvisions.com; hmeyr@webtv.net; jackson@hughes.net; janna\_3000@yahoo.com; Jason\_Pyron@fws.gov; Jason\_Sutter@blm.gov; jbaum@uwalumni.com; jburquidi@msn.com; John.Biar@agri.idaho.gov; jon@owyheeavalanche.com; jrachael@idfg.idaho.gov; jrobison@idahoconservation.org; jromero@owyheeair.com; jvcwma@qwestoffice.net; kraberasturi@yahoo.com; Kristin\_lohr@fws.gov; krm@gscwireless.net; Lara\_R\_Rozzell@nps.gov; lchandler@blm.gov; lindle.offenbacker@id.usda.gov; lokeson@blm.gov; mbyrne@blm.gov; mendijaca@yahoo.com; michelle.common@idfg.idaho.gov; milleronglen@aol.com; mspicer@blm.gov; Norba@clearwire.net; OCNRC DIR@aol.com; paulnett2001@yahoo.com; pharrington@tu.org; Pilcher@congervet.com; pnielsen@house.idaho.gov; pwaldon@merrittbros.com; pwaldon@msn.com; rayola\_1@msn.com; rick.raymondi@idwr.idaho.gov; riddleranches@yahoo.com; rluke@idl.idaho.gov; ron.brooks@id.usda.gov; ron.hartzmänn@ars.usda.gov; Sankteki@isu.edu; scooter401962@yahoo.com; scottj@uidaho.edu; shrj@juno.com; stephenvgoddard@yahoo.com; steve.nadeau@idfg.idaho.gov; sv@centurylink.net; Tate.Walters@id.usda.gov; thaneb73@hotmail.com; todd.k.grimm@aphis.usda.gov; verti@congervet.com; wmbpratt@yahoo.com; Y2ranch@aol.com; bralston@blm.gov; sdouglas@idl.idaho.gov; pseymour@idl.idaho.gov; nmhill@mindspring.com; clyons714@gmail.com; s.iflybye@gmail.com; jholbrook@vandals.uidaho.edu; niem3790@vandals.uidaho.edu; stacy.thornbrugh@id.usda.gov; mcook@blm.gov; jd@uidaho.edu; tthrift@blm.gov; kathleen\_hendricks@fws.gov; amondor@idl.idaho.gov; mnmcgee@blm.gov; psalant@uidaho.edu; laura.a.schnapp@state.or.us; mark.hansen@cpsagu.com; SolutionsForBirdConservation@gmail.com; idhoundsman@q.com  
**Subject:** Fw: SAC meeting presentations on you-tube

----- Original Message -----

**From:** [Kemner, Don](#)

**Sent:** Monday, June 23, 2014 9:52 AM

**Subject:** SAC meeting presentations on you-tube

Please share with Local Working Groups.

Three presentations were video-taped at the May SAC meeting in an effort to share information with LWGs. The video playlist are available on you-tube at the link below. Each video is 30-50 minutes.

[https://www.youtube.com/playlist?list=PLt-O2UCcvHHE\\_gZGje-sNT\\_-mXr6pVkk](https://www.youtube.com/playlist?list=PLt-O2UCcvHHE_gZGje-sNT_-mXr6pVkk)

The videos are:

- Update on BLM/FS Sage-grouse EIS Process by Brent Ralston (BLM)
- How Does Spring Livestock Grazing Influence Sage-grouse Populations? By Courtney Conway (Idaho Cooperative Research Unit) and Karen

Launchbaugh (University of Idaho)

- Update on Sagebrush Nutrition Research by Jennifer Forbey (Boise State)

You may want to watch a video at your next LWG meeting.

Don Kemner  
Wildlife Program Coordinator  
Idaho Department of Fish and Game  
P.O. Box 25, 600 S. Walnut Street  
Boise, ID 83707  
(208) 287-2748 office



<http://fishandgame.idaho.gov/75th/>



Beck, Jonathan &lt;jmbeck@blm.gov&gt;

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**Comments on BLM Sage Grouse Plans**

1 message

**Doug Burdin** <dburdin@verizon.net>

Mon, Jun 29, 2015 at 4:11 PM

To: jmbeck@blm.gov

Cc: "Burdin, Doug" &lt;DBurdin@safariclub.org&gt;

Attached are the comments of Safari Club International on the greater sage grouse proposed LUP and final EIS. Please contact me with any questions. Thank you.

Douglas S. Burdin, Esq.

Litigation Counsel

Safari Club International

501 Second Street, NE

Washington, D.C. 20002

202-543-8733

fax-202-543-1205

[dburdin@safariclub.org](mailto:dburdin@safariclub.org)

"Join us in Las Vegas, Nevada February 3–6, 2016 for SCI's 44th Annual International Hunters Convention - the World's Biggest and Best Hunters' Market"

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**2015 06 29 - Comments - SCI - Idaho and SW Montana Land Use Draft Plan Amendments and Final****EIS.pdf**

171K





June 29, 2015

Via First Class Mail and Email: [ramiller@blm.gov](mailto:ramiller@blm.gov), [jmbeck@blm.gov](mailto:jmbeck@blm.gov)

Bureau of Land Management  
5001 Southgate Drive  
Billings, MT 59101

Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

**Re: Safari Club International Protest of the 2015 Idaho and Southwestern Montana Greater Sage-Grouse Proposed Land Use Plan Amendments and Final Environmental Impact Statement, EIS No. 20150145**

Dear Sir or Madam:

Safari Club International (SCI) appreciates the opportunity to provide our comments on the 2015 above-referenced Greater Sage-Grouse Proposed Land Use Plan Amendments and Final Environmental Impact Statement (Plan Amendments and Final EIS). SCI and its members consider the Plan Amendments and Final Plan to be inadequate in terms of their assessment of the potential adverse impact of the proposed actions on the hunting community. SCI comments on these documents to inform the agencies in their preparation of the Record of Decision. SCI is filing the comments within the 30 day period following the publication of the Final EIS.

### **Safari Club International**

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 47,000 members worldwide, many of whom hunt on federal lands, including those that are the subject of the Plan Amendments and Final EIS. SCI's missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool. The Plan Amendments and Final EIS will likely impact many hunting opportunities currently open to SCI members, as well as the access SCI members will have to these opportunities.

### **The Plan Amendments and Final EIS Do Not Adequately Consider or Evaluate the Potential Adverse Impacts on Hunting on the Subject Lands**

At most, the Plan Amendments and Final EIS offer a very superficial and conjectural examination of the potential adverse impacts that the proposed actions will have on hunting opportunities and access to those hunting opportunities in the planning areas. The likely closures of roads and limitations of means of transportation with the planning areas will undoubtedly affect the ability of many to hunt, access hunting areas and retrieve successfully hunted game. Those limits could impact individual hunters, hunting and outfitting businesses, and other

SCI Comments on Idaho and SW Montana Greater Sage-Grouse Proposed Land Use Plan Amendments and Final Environmental Impact Statement

June 29, 2015

Page 2 of 2

businesses related to hunting. In additions, such closures and limitations could reduce the revenue generated from hunting by the State and the State's ability to use that revenue for managing and conserving wildlife and habitat. The BLM and Forest Service should not approve any actions under the Plan Amendments and Final EIS without conducting a detailed analysis of the ramifications of those actions on the hunting interests in the affected areas. The Plan Amendments and Final EIS do not adequately fulfill this requirement.

These inadequacies may, at least in part, be the result of the haste that the agencies are making to comply with the Greater Sage Grouse (GSG) listing deadline to which the U.S. Fish and Wildlife Service (FWS) committed itself in a litigation settlement. In making that commitment, the FWS put an unnecessary burden not only on itself, but also on all federal agencies with management responsibilities for wildlife and land within GSG habitat. This commitment also affects other stakeholders, such as states and the public who use those lands. That haste has led to a situation where concerns for the listing of the GSG have potentially overridden competing concerns for other species and the needs of the public who use resources within GSG habitat. The BLM and FS must not let the time constraint lead to mistakes and to decisions that fail to take into account the interests of those whose recreation and/or livelihoods depend upon access to the lands addressed by the Plan Amendments and Final EIS.

SCI cautions the BLM and FS to make certain that future project and site specific planning, conducted as part of the implementation of the Plan Amendments and Final EIS, includes comprehensive analyses of the impact of these actions on the hunting community and on the need to continue to hunt and access hunting opportunities in the subject areas.

Thank you again for the opportunity to protest on this important planning decision. If you have any questions or need anything further, please contact Anna Seidman, Director of Litigation, [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Sincerely,



Craig Kauffman  
President, Safari Club International



July 31, 2014

**VIA U.S. MAIL and E-MAIL**

Mr. Brent Ralston  
Idaho and Southwestern Montana  
Sub Regional Project Lead  
Greater Sage-grouse EIS  
1387 S. Vinnell Way  
Boise, ID 83709

Email: [blm\\_id\\_swmt\\_sagegrouse\\_eis@blm.gov](mailto:blm_id_swmt_sagegrouse_eis@blm.gov)

**Re: Supplemental Comments on the Draft Land Use Plan Amendment and Environmental Impact Statement; DOI-BLM-UT-9100-2013-0002-EIS**

Dear Mr. Ralston:

The National Mining Association (NMA), the American Exploration & Mining Association (AEMA) and the Industrial Minerals Association – North America (IMA-NA) (collectively “the Associations”) supplement their original comments submitted on January 29, 2014 on the Bureau of Land Management (BLM) and United States Forest Service (USFS) (collectively Agencies) Draft Land Use Plan Amendment (LUPA) and Environmental Impact Statements (EIS) for the Greater sage-grouse (GRSG) (LUPA/EIS). Since the comment period closed, additional information has become available, which directly supports many of the comments the Associations raised in January. For this reason, the Associations seek to supplement the administrative record with their additional comments and materials referenced herein.

In its original comments, the Associations identified deficiencies with the National Technical Team (“NTT”) Report and its associated studies, contending the underlying studies lacked independent authorship, had various methodological and data quality issues, and included limiting factors such as inadequate sampling that undermined the results. Specifically, the Associations referred to several other scientific reports that called these NTT studies into question. One such report was a pre-publication paper prepared by Dr. Robert M Zink, *Comparison of Patterns of Genetic Variation and Demographic History in the Greater Sage-Grouse (Centrocercus urophasianus); Relevance for Conservation* (“Zink Study”). Since the comment period closed, however, Dr. Zink has now finalized his study and a copy is attached hereto as Exhibit A. Notably, Dr. Zink concludes, in part, that “[t]here is no clear evidence that

the population genetic variability of the greater sage-grouse has been influenced by range reduction and fragmentation.” Indeed, Dr. Zink’s study contradicts the findings of Garton, *et al.*, which is cited by the FWS to support the warranted but precluded determination, and the agency’s conclusion that habitat fragmentation caused by human activities, such as oil and gas development, mining and grazing, are responsible for GSG population declines. Because the Associations raised this comment earlier, and specifically cited Dr. Zink’s pre-publication paper, the LUPA/EIS administrative record should be supplemented to include the final Zink Study, which refutes the work of other scientific reports the agency is directly relying upon.

In the originally filed January 2014 comments, the Associations also discussed the inadequacy of the No Action Alternative, contending that it failed to consider existing conservation measures already implemented on the ground. Specifically, the Associations noted the United States Fish & Wildlife Service’s (“FWS”) efforts to protect candidate species by partnering with private landowners as one of these sorts of pre-existing measures that needed to be accounted for. In support of this position is a recent communication from Jason A. Weller, Chief of the Natural Resources Conservation Service (NRCS), dated April 25, 2014, to Colorado Governor Hickenlooper. In this letter, the NRCS discusses exactly these sorts of collaborative and voluntary conservation efforts that the Associations referred to in their original comments. A copy of this letter is attached as Exhibit B. As the letter explains, NRCS has invested approximately \$354 million in the past three years, which has served to protect millions of acres of GRS habitat on private land throughout the eleven western states. NRCS estimates that the additional hiding cover it has protected through its Sage-Grouse Initiative (SGI) will “increase sage-grouse numbers by 8 to 10 percent within the 2.6 million acres of grazing systems implemented.” This letter evidences why partnering with private landowners and developing incentive programs like those discussed therein are a key component to any GRS conservation plan. Furthermore, this letter is significant because NRCS expresses concern with an ESA listing (and associated habitat designations), as they are already seeing the negative effects on their voluntary programs across private land. Several of the alternatives in the LUPA/EIS could very likely have the same effect in Utah.

Similarly, the Associations commented that the No-Action Alternative did not address or account for the other voluntary conservation programs like those funded by certain NRCS programs, including the Wildlife Habitat Incentive Program and the Farm and Ranch Lands Protection Program, both of which have proven to be successful, as the NRCS letter explains. For this reason, the Associations request the administrative record be supplemented to include this recent NRCS letter as well as this supplemental comment.

Other documents that should be included in the administrative record are the recent communications to the State of Utah and Nevada from the FWS. On May 13, 2014, Governor Herbert (Utah) received a letter from the FWS Director Dan Ashe, and Governor Sandoval (Nevada) received a similar letter from Southwest Regional Director Ren Lohofener discussing the respective state plans and certain recommendations, including applying regulatory mechanisms to state and private lands. A copy of these letters is attached as Exhibit C. The letter to Governor Herbert states that the FWS recognizes the need for regulatory mechanisms on state and private land given that a large proportion of GRS populations are on non-federal lands. Consequently, the FWS states its commitment to implementing the state conservation plan, so long as it includes these sufficient regulatory mechanisms on state and private land. The

Nevada letter is similar in that it recognizes the need to include voluntary measures and encourage private landowners to conserve key wet meadow habitat. These letters should be incorporated into the administrative record because they expand on the Associations original comments regarding the need to consider voluntary measures as well as state-wide conservation plans that are already exist.

The Associations also seek to supplement the administrative record with another publication prepared after the close of the comment period. Recently, the Western Governors Association (WGA) published a third report on the status of local and state efforts to protect the GRSG. *See* Inventory of State and Local Government's Conservation Initiatives for Sage-grouse (February 20, 2014) (referred to as the "WGA 2014 Inventory"), a copy is attached as Exhibit D. This report reviews sage-grouse conservation activities throughout the affected western states during 2013. Similar to the NRCS letter, this report also informs the Associations' original comments regarding the benefits of voluntary conservation programs. Like the comments above, the NO Action Alternative failed to develop an accurate baseline condition when it failed to consider these numerous state-wide and local conservation efforts. The Associations request the BLM carefully consider the recent WGA 2014 Inventory and supplement the administrative record with this report.

The Western Governors Association also recently held their annual meeting in Colorado Springs during the week of June 9, 2014, in which the plight of the GRSG was discussed at length. One outcome of the annual meeting was the signing of Policy Resolution 2014-11, *Species of Concern and Candidate Species*, in which the Governors emphasize the need for state plans to lead the GRSG conservation effort rather than the federal government. A copy of this Resolution is attached as Exhibit E. This collective voice of the leaders in the affected western states should be included in the administrative record to demonstrate the political will of these states that are in the best position to understand the state-specific issues, conditions, and opportunities to protect the GRSG.

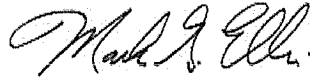
Finally, in April 2014, after the comment period closed, Secretary Jewell issued a detailed mitigation strategies report, launching a new directive for mitigation programs agency-wide. A copy of the report is attached as Exhibit F. The Associations' original comments discussed—at length—the need for a sufficient mitigation program, and in fact, referenced the initial order from Secretary Jewell, which has now been finalized. While the Associations may not agree with this report in several key respects, it nevertheless should be considered when determining the impacts of the "No Action" alternative. Because of the expanded mitigation requirements set forth in this report, GRSG impacts, even without any changes to the land use plans, should be diminished. Accordingly, this latest report is directly on point, was specifically referenced in the original comments, and should be incorporated into the LUPA/EIS decision-making process.

In conclusion, various documents, reports and statements have been prepared since the public comment period closed on January 29, 2014, which are directly related to certain issues the Associations raised in its original comments submitted in January 2014. The Associations request the BLM carefully consider the attached materials and supplement both the Associations' comments and the administrative record with this new information.

Sincerely,



Executive Director  
American Exploration &  
Mining Association



President  
Industrial Minerals  
Association  
- North America



Adam Eckman  
Associate General Counsel  
National Mining Association



# Comparison of Patterns of Genetic Variation and Demographic History in the Greater Sage-Grouse (*Centrocercus urophasianus*): Relevance for Conservation

Robert M. Zink\*

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**Abstract:** The greater sage-grouse (*Centrocercus urophasianus*) was once widespread in western North America but its range has contracted by an uncertain degree owing to anthropogenic and natural causes. Concern over population declines has led to its proposed listing as threatened under the U.S. Endangered Species Act. Detailed genetic and demographic analyses of this species throughout its range are available but heretofore have not been compared. Reduced genetic variability is often taken as a proxy for declining populations, but rarely are there quantitative population estimates with which to compare. I compared published mitochondrial DNA (mtDNA) control region sequences, microsatellite allele frequencies at seven loci, and estimates of numbers of males per lek, number of active leks, percent decline in the best population models, and the probability (P) of  $N_e < 50$  in 30 years and  $P(N_e < 500)$  in 100 years, at two spatial scales, 45 local population samples and 16 larger aggregates of samples. When excluding the populations from the Columbia Basin, which show little genetic diversity and are statistical outliers, there were no consistent relationships between estimates of genetic variation and demographic trends across the remainder of the range at either spatial scale. A measure of inbreeding derived from microsatellite data was also not related to population trends. Thus, despite habitat reduction and range fragmentation, the greater sage-grouse does not exhibit expected genetic signatures of declining populations. Possibly, the mtDNA and microsatellite data are insufficiently sensitive to detect population declines that have occurred over the span of a half century. Alternatively, only when populations are reduced to the levels seen in the Columbia Basin will genetic effects be seen, suggesting that the bulk of the range of the greater sage-grouse is not currently in genetic peril.

**Keywords:** conservation genetics, heterozygosity, inbreeding, microsatellite loci, mitochondrial DNA, population management, population structure.

## INTRODUCTION

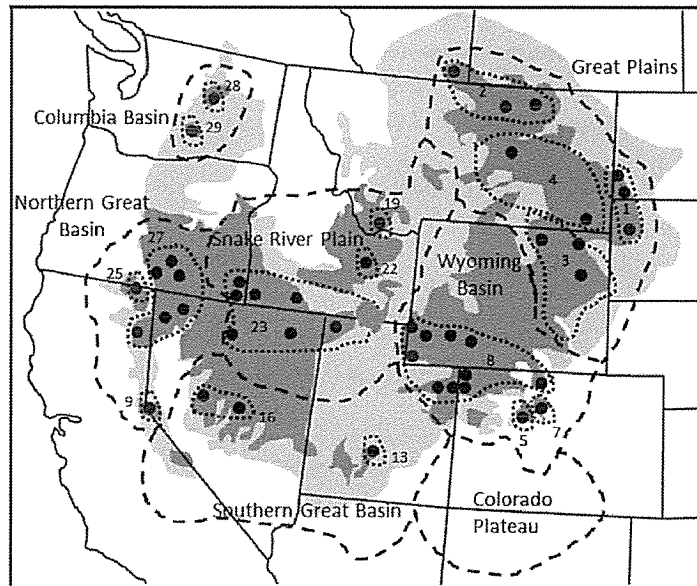
Many sources of biological information can guide management of threatened and endangered species. Measures of genetic variability and differentiation provide indirect historical information on whether populations have experienced bottlenecks or inbreeding, or have been isolated from exchanging individuals with other populations. Measures of demographic fluctuations through long-term population monitoring provide evidence on more recent population fluctuations. In theory, these two types of information should be complementary. Lower than average levels of genetic variability are typically inferred to be a result of population declines. Oyler-McCance *et al.* [1:1293] noted that such populations “can suffer from inbreeding effects and can be more susceptible to parasitic agents and disease.” Small populations can lose genetic diversity, which could hamper their ability to respond to new (or current) environmental challenges [2]. Furthermore, slightly deleterious alleles might increase in frequency and result in lower individual fitness. Given the potential for genetic and demographic information jointly to inform conservation efforts, it is surprisingly rare

to be able to compare measures of genetic variation and inbreeding depression with quantitative estimates of demographic history, especially for species of conservation concern.

The greater sage-grouse (*Centrocercus urophasianus*), considered threatened (but precluded) under the U.S. Endangered Species Act [3], is an exception. Garton *et al.* [4] provided a detailed demographic study of greater sage-grouse population trends at two geographic levels, a broad, inclusive level that included the seven sage grouse management zones (SMZ, Fig. 1), and 30 smaller population units within these zones. Using data from 1965 to 2007 (in five-year intervals) on the number of active leks (display grounds) and males per active lek, they computed estimates of population trends, and estimated the probability of population persistence (P) at two levels ( $N_e < 50, 500$ ) 30 and 100 years into the future.  $N_e$  refers to the genetic effective population size, which is a function of how males and females contribute to future generations, and not an estimate of the census size of a population. They concluded that some populations are in danger of falling below the putative minimum viable population sizes or 50 or 500, which some consider arbitrary [5]. This makes it appropriate to survey genetic variation to determine if populations estimated to be on downward trajectories also show reductions in levels of genetic diversity.

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**Fig. (1).** Plot of sample sites (blackened circles) for genetic samples [1]. Dashed lines indicate greater sage-grouse Management Zones, and dotted lines indicate population samples from [4]. Numbers correspond to sequence of populations in [4]. Dark gray indicates current distribution and light gray indicates estimate of historical distribution.

Oyler-McCance *et al.* [1] surveyed mitochondrial DNA control region (141 base pairs) variation and genotyped seven microsatellite loci for over 1000 greater sage-grouse from 45 populations (Fig. 1) throughout the same area as that analyzed by Garton *et al.* [4]. They provided measures of genetic variation within populations, and genetic differentiation among the same populations for which Garton *et al.* [4] tallied the number of active leks and number of males per individual populations. In addition Oyler-McCance *et al.*'s [1] genetic data can be summarized for six of the seven SMZs (only the Colorado Plateau was missing), and for 16 of the 30 larger populations for which Garton *et al.* [4] provided measures of long-term demographic fluctuations and  $P(N_e < 50; N_e < 500)$ . In this paper I compare genetic variability measures with quantitative estimates of population trends to determine whether the effects of population declines can be observed at two geographic scales in the microsatellite and mitochondrial DNA data for this species of conservation concern. The available data sets also allow comparison of the extent to which mtDNA and microsatellites provide similar estimates of population genetic variability.

## MATERIAL AND METHODOLOGY

Analyses were performed on two data sets. Data set I consisted of 45 population samples, each of which has microsatellite and mtDNA data [1] and data on the number of active leks and number of males/active lek [4]. Data set II included the 16 population groupings for which Garton *et al.* [4] estimated  $P(N_e < 50$  or  $N_e < 500)$  in the next 30 or 100 yr, and for which mtDNA and microsatellite data were available. In addition, I used the percent population change in Garton *et al.*'s [4] "best model" as a measure of population fluctuation. Populations for which Garton *et al.* [4] did not find a significant overall trend were considered stable over the time period. For both data sets, if the relationship between the number of individuals sampled and measures of

genetic variability were significantly correlated, residuals from linear regression were used in place of actual values (no differences were found using residuals from other regression models).

For data set II I regrouped individuals' mtDNA and microsatellite data and recomputed measures of genetic variability using Arlequin 3.5.1.3 [6]. Arlequin was also used to compute the Garza-Williamson [7] index (and a modified version) for both data sets (e.g., 16 and 45 population units), which compares the number of alleles at loci with the allelic range to provide an indication of whether populations exhibit effects of bottlenecks. I performed analyses with and without the samples from Yakima and Douglass/Grant (Moses Coulee, WA) representing the Columbia Basin, owing to the possibility that the low variation in these samples represents outliers that could bias analyses.

To evaluate the relationship among the variables, I computed a matrix of Pearson product-moment correlation coefficients. The computation of multiple coefficients runs the risk of spurious significance values. A standard approach is to apply a Bonferroni correction [8] that results in an experiment-wide lowering of the alpha level accepted for significance. For data set I, the level would be  $0.05/21$  (0.0024) and for data set II,  $0.05/45$  (0.0011). Many authors [e.g., 9, 10] have pointed out that this is extremely conservative and runs the opposite risk of failing to recognize significant values, especially if the relationship is weak but nonetheless significant and in studies with relatively small sample sizes. Because this is one of the first large-scale comparisons of genetic and demographic data, and is partly exploratory in nature, I assessed statistical significance using the standard of  $P < 0.05$ , but it should be realized that some values are insignificant if the Bonferroni criterion is applied. Of course if a standard  $P$ -value is not significant, the Bonferroni correction is irrelevant. In addition, although comparisons among genetic variables or among demographic variables are

likely non-independent, comparisons between these two classes of variables are less so. For example, in data set I, there are eight comparisons between genetic and demographic variables, and one could consider the appropriate Bonferroni correction to be 0.05/8 or 0.0063.

To determine whether one might expect a genetic signature of population reductions, I constructed 10 random samples from the total pool of individuals with microsatellite data that matched the observed sample size for each of the 45 populations in Oyler-McCance *et al.* [1], and plotted the relationship between number of individuals and average number of alleles/locus. If there were no relationship, it would suggest there was not enough variability among samples to detect effects from demographic fluctuations.

Previous genetic analyses [1, 11, 12] documented the existence of two well-separated mtDNA clades that are currently geographically co-distributed over much of the range. To evaluate whether these might have once been allopatric and secondarily sympatric, and to provide historical perspective on the distribution and range displacements of greater sage-grouse, I computed ecological niche models for the present, Last Glacial Maximum (LGM; 21,000 ybp), and Last interglacial (LIG; 120,000 ybp). Locality records ( $n = 173$ ) were obtained from Ornis2 (<http://ornis2.ornisnet.org/>); duplicate records (those <1 km apart) were eliminated. Correlative ecological niche models [13, 14] were constructed using MAXENT ver 3.2.2 [15] for the present and projected to the LGM (CCSM database). Climatic data (19 layers) were obtained from the Worldclim bioclimatic database [16], and trimmed so as to provide a buffer around each species' range. Multiple methods exist to account for correlations among climate variables, none with clear superiority [17]. Based on an initial MAXENT run, climatic layers that contributed 5% or more to the model were chosen (layers 1 2 3 8 11 13 18) and MAXENT was rerun using these layers and all locality records for final maps. Each map was based on the average of five MAXENT runs (using all points) and plotted using DIVA-GIS ver. 7.1.7.2 [18]. Predicted distribution maps were coded as presence/absence using the logistic threshold for equal training sensitivity and specificity produced by MAXENT (value = 0.375). MAXENT outputs a threshold-independent measure of the overall performance of the model (Area Under the Receiver Operating Curve or AUC). An AUC value of 0.5 indicates the predictive model is no better than random, whereas higher AUC values indicate better predictive ability with a value of 1 indicating perfect prediction. MAXENT's auto-features and the default regularization multiplier parameter (1.0) were used, and the number of iterations was increased to 1500 to allow the program to reach the default convergence threshold.

To explore further the recent evolutionary history of the two mtDNA clades of greater sage-grouse, DnaSP [19] was used to compute a mismatch distribution and associated statistics ( $k$ , average number of haplotypes;  $\pi$ , nucleotide diversity;  $h$ , haplotype diversity) independently for each clade.

## RESULTS

### Data Set I (45 Populations)

None of the measures of genetic variability (Table 1, Fig. S1) were significantly ( $P > 0.05$ ) correlated with number of

individuals per sample (Table 2). Measures of genetic variability were significant correlated for each type of genetic data, heterozygosity and number of alleles/locus ( $P < 0.001$ ) for microsatellites, and haplotype and nucleotide diversity ( $P < 0.001$ ) for the mtDNA data. Several measures of variability at microsatellite loci and mtDNA were significantly correlated, number of alleles/locus and haplotype diversity ( $P = 0.017$ ), number of alleles/locus and nucleotide diversity ( $P = 0.05$ ), heterozygosity and nucleotide diversity ( $P < 0.024$ ), and heterozygosity and haplotype diversity ( $P < 0.001$ ). There were no consistent or significant relationships between numbers of active leks, number of males/active lek, and heterozygosity, alleles/locus, mtDNA haplotype and nucleotide diversity (Fig. S1). Although microsatellite heterozygosity was significantly ( $P = 0.0395$ ) correlated with the number of active leks, this relationship does not remain ( $P = 0.10$ ) when the two samples from the Columbia Basin are omitted. The G-W index was not significantly ( $P > 0.05$ ) related to measures of population trends (Fig. 2).

### Data Set II (16 Populations)

Only the average number of alleles/locus was significantly correlated ( $P < 0.001$ ) with number of individuals per sample, hence, residuals from the regression of these two variables were used subsequently (Table 3). Measures of genetic variability were significant correlated for each type of genetic data, heterozygosity and number of alleles/locus ( $P = 0.007$ ) for microsatellites, and nucleotide and haplotype diversity for the mtDNA data ( $P < 0.001$ ) (Table 4). Heterozygosity was correlated with haplotype diversity ( $P = 0.013$ ), and number of alleles/locus was correlated with haplotype ( $P = 0.019$ ) and nucleotide ( $P = 0.013$ ) diversity. When the two samples from the Columbia Basin were omitted, no significant correlations remained. With one exception, no correlations were significant between measures of genetic variability and percent decline in best model,  $P(\text{Ne}) < 50$  in 30 years or  $P(\text{Ne}) < 500$  in 100 years (Figs. 3-4). The G-W index was not significantly ( $P > 0.05$ ) related to measures of population trends (Fig. 5). Interestingly, there were no significant correlations between percent decline in best model,  $P(\text{Ne}) < 50$  in 30 yrs, and  $P(\text{Ne}) < 500$  in 100 yrs (Table 4). Random samples of microsatellite genotypes showed that the average number of alleles/locus varied from 6 to 12 (Fig. S2), suggesting that this genetic measure has the potential to reveal demographic declines.

### Ecological Niche Models

Predicted current distribution agrees with the known historical distribution (Fig. 6) and the LIG predicted distribution (not shown); the AUC score of 0.947 estimated under current climate conditions indicates a very good ability to discriminate between presence and absence locations. The LGM distribution suggests two potential refugia, one in the southeast and the consisting of the remainder of the range. Although there is southward displacement at the LGM, much of the distribution, especially in the west, is similar to that found today, suggesting that the species was not greatly range-restricted especially in the western part of the range, at the LGM.

**Table 1.** Population samples, greater sage-grouse Management (SMZ) zones, number of active leks, number of males per active lek and measures of genetic variability at 7 microsatellite loci and mtDNA control region for 45 population samples<sup>1</sup> [1, 4].

Population	SMZ zone <sup>3</sup>	No. active leks	No. males/active lek	No. males	HEave	Ave. No. alleles	G-W modified index	MtDNA h	MtDNA $\pi$
Warner <sup>2</sup>	nogrbas	1	7	7	0.664	5.29	0.186	0.836	0.023
Strawberry valley	sogrbas	5	23	115	0.679	3.86	0.112	0.549	0.015
Yakima	cb	8	16	128	0.446	3.29	0.117	0.000	0.000
Douglass/grant	cb	12	18	216	0.457	3.14	0.104	0.529	0.010
Beaverhead	sr	15	18	270	0.680	6.00	0.189	0.645	0.011
Eagle	wyo	15	17	255	0.707	5.71	0.18	0.619	0.018
Middle	wyo	15	17	255	0.714	5.71	0.191	0.724	0.015
North park	wyo	15	17	255	0.671	6.43	0.206	0.814	0.018
Humboldt	sr	16	7	112	0.701	6.43	0.211	0.738	0.013
Lyon/Mono	sogrbas	19	19	361	0.587	5.71	0.201	0.738	0.020
Wayne	sogrbas	29	33	957	0.566	5.00	0.157	0.737	0.018
Harding	gp	39	16	624	0.583	5.57	0.164	0.657	0.036
Slope	gp	39	16	624	0.614	4.86	0.146	0.589	0.015
Bowman	gp	39	16	624	0.641	5.43	0.167	0.606	0.016
Valley	gp	123	28	3444	0.667	6.86	0.203	0.563	0.016
Phillips	gp	123	28	3444	0.679	6.14	0.179	0.804	0.016
Alberta	gp	123	28	3444	0.683	7.14	0.218	0.539	0.014
Bighorn	gp	158	19	3002	0.620	5.14	0.168	0.647	0.013
Weston	gp	158	19	3002	0.667	6.29	0.181	0.826	0.018
Churchill	sogrbas	159	19	3021	0.651	5.57	0.195	0.745	0.019
Nye	sogrbas	159	19	3021	0.696	6.29	0.209	0.747	0.020
Beattys butte	nogrbas	175	28	4900	0.720	5.71	0.195	0.862	0.023
Steen's	nogrbas	175	28	4900	0.749	6.00	0.195	0.762	0.024
Wagontire	nogrbas	175	28	4900	0.709	5.57	0.183	0.819	0.027
Washoe	nogrbas	175	28	4900	0.679	5.71	0.19	0.826	0.028
Sheldon	nogrbas	175	28	4900	0.703	5.29	0.18	0.813	0.025
Lassen	nogrbas	175	28	4900	0.679	6.43	0.209	0.745	0.018
Medicine lodge	sr	207	23	4761	0.721	8.00	0.245	0.754	0.016
Rosebud	gp	231	21	4851	0.676	6.71	0.204	0.561	0.016
Fergus	gp	231	21	4851	0.689	6.29	0.182	0.530	0.014
Owyhee	nogrbas	366	19	6954	0.713	6.43	0.217		
Box	sr	366	19	6954	0.671	6.86	0.202	0.616	0.016
Riddle	sr	366	19	6954	0.696	5.43	0.182	0.730	0.025
Curlew valley	sr	366	19	6954	0.720	6.29	0.194	0.620	0.010
Magic valley	sr	366	19	6954	0.693	7.00	0.22	0.854	0.042
Whitehorse	sr	366	19	6954	0.684	6.00	0.205	0.729	0.024

(Table 1) contd....

Population	SMZ zone <sup>3</sup>	No. active leks	No. males/active lek	No. males	HEave	Ave. No. alleles	G-W modified index	MtDNA h	MtDNA π
Elko	sr	366	19	6954	0.754	7.00	0.225	0.863	0.039
Blue Mtn CO	wyo	807	33	26631	0.690	5.71	0.184	0.667	0.015
Cold springs	wyo	807	33	26631	0.693	6.14	0.201	0.707	0.017
Rich	wyo	807	33	26631	0.693	6.71	0.209	0.801	0.020
Diamond	wyo	807	33	26631	0.690	6.00	0.19	0.769	0.018
Blue Mt - UT	wyo	807	33	26631	0.576	4.86	0.154	0.614	0.013
Kemmerer	wyo	807	33	26631	0.703	5.71	0.186	0.732	0.017
Farson	wyo	807	33	26631	0.716	6.00	0.188	0.637	0.014
Rawlins	wyo	807	33	26631	0.749	6.71	0.218	0.626	0.012

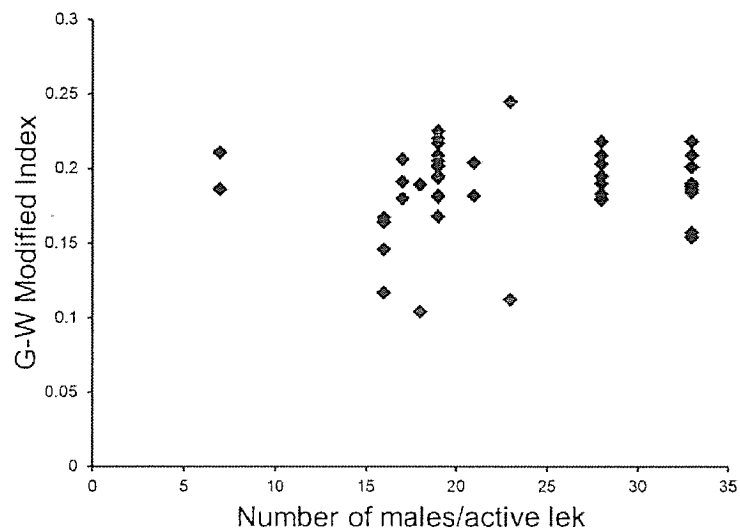
<sup>1</sup>Oyler-McCance *et al.* [1] show a locality "Owyhee, OR" on their Figure 5 that was not represented in their genetic data. Their locality point for "Weston WY" is actually for "Converse, WY" and there is no locality point for Weston, WY on their Figure 5.

<sup>2</sup>Although Garton *et al.*[4] list one lek with seven males, Oyler-McCance *et al.* [1] analyzed 19 individuals for mtDNA and 22 individuals for the seven microsatellite loci, presumably as a result of sampling over years.

<sup>3</sup>nogrbas = Northern Great Basin, sogrbas = Southern Great Basin, cb = Columbia Basin, sr = Snake River Plain, wyo = Wyoming Basin, gp = Great Plains.

**Table 2. Correlations among genetic [1] and demographic parameters [4] for 45 populations of greater sage-grouse. Asterisks indicate standard statistical significance levels (\* P < 0.05, \*\* P < 0.01, \*\*\* P < 0.001); see text for significance levels if applying Bonferroni corrections.**

	No. active leks	No. males/active lek	No. males	Heterozygosity (ave)	Number alleles/locus (ave)	MtDNA h	MtDNA π
No. males/active lek	0.68**						
No. males	0.98**	0.72**					
Heterozygosity (ave)	0.31*	0.21	0.26				
Number alleles/locus (ave)	0.25	0.13	0.18	0.71**			
MtDNA h	0.12	0.13	0.09	0.59**	0.45**		
MtDNA π	0.01	-0.03	-0.07	0.39*	0.30*	0.66**	



**Fig. (2).** Plot of Garza-Williamson inbreeding index [7] versus number of males per active lek [4] in greater sage-grouse, showing a lack of a relationship.

Table 3. Demographic [4] and genetic [1] data for 16 population units of greater sage-grouse.

Population (numbered area on Fig. 1)	SMZ Zone	N micro-sats	N mtDNA	No. active leks	No. males per active	No. males	Heterozygosity	No. al-leles/locus	Residuals No. al-leles/locus	MtDNA h	MtDNA pi	decline in best model	P(Ne) <50 in 30 yrs	P(Ne) <500 in 100 yrs
Warner (Klamath OR) (25)	Northern Great Basin	22	19	1	7	7	0.59	5.29	-0.26	0.836	0.023		4.2	91.3
Yakima (29)	Columbia Basin	29	25	8	16	128	0.45	3.29	1.05	0.000	0.000	0.00	26.1	100.0
Douglas/Gant (Moses Coulee) (28)	Columbia Basin	21	18	12	18	216	0.47	2.86	1.11	0.529	0.010	-4.30	9.8	99.8
Beaverhead (Red Rocks, MT) (19)	Snake River Plain	19	22	15	18	270	0.71	6.00	-0.74	0.645	0.011	0.00	0.1	91.9
Middle (7)	Wyoming Basin	21	21	15	17	255	0.70	5.71	-0.52	0.724	0.016	3.70	2.5	100.0
Lyon/Mono (9)	Southern Great Basin	68	54	19	19	361	0.52	5.71	0.56	0.738	0.020	1.00	15.4	100.0
South central UT <sup>1</sup> (13)	Southern Great Basin	27	25	29	33	957	0.58	5.00	0.02	0.737	0.018	0.00	0.0	21.0
Dakotas <sup>2</sup> (1)	Great Plains	81	79	39	16	624	0.58	6.71	0.29	0.614	0.021	-3.20	4.6	66.3
Northern montana <sup>3</sup> (2)	Great Plains	84	73	123	28	3444	0.65	8.71	-0.79	0.613	0.015	0.00	0.0	2.0
Powder river <sup>4</sup> (3)	Great Plains	40	40	158	19	3002	0.59	7.00	-0.82	0.743	0.016	-7.30	2.9	86.2
Southern Great Basin <sup>5</sup> (16)	Southern Great Basin	42	38	159	19	3021	0.64	7.29	-0.94	0.750	0.021	-0.10	0.0	78.0
Western Great Basin <sup>6</sup> (27)	Northern Great Basin	158	122	175	28	4900	0.67	8.86	0.84	0.834	0.025	0.00	5.5	99.1
Snake-Salmon Beaverhead <sup>7</sup> (22)	Snake River Plain	36	20	207	23	4761	0.73	8.00	-1.49	0.754	0.016	0.00	4.2	26.8
Yellowstone Watershed <sup>8</sup> (4)	Great Plains	55	46	231	21	4851	0.65	7.71	-0.88	0.550	0.015	-4.50	0.0	59.8
Northern Great Basin <sup>9</sup> (23)	Snake River Plain	189	214	366	19	6954	0.65	11.14	0.25	0.804	0.022	-4.30	2.1	99.7
Wyoming Basin <sup>10</sup> (8)	Wyoming Basin	268	254	807	33	26631	0.66	10.71	2.32	0.758	0.017	-3.40	0.0	10.7

Locations within major populations from Oyler-McCance *et al.* (2005): <sup>1</sup>Wayne; <sup>2</sup>Harding, Slope, Bowman; <sup>3</sup>Valley, Phillips, Alberta; <sup>4</sup>Bighorn, Weston; <sup>5</sup>Churchill, Nye; <sup>6</sup>Beattys Butte, Steens, Wagontire, Washoe, Sheldon, Lassen; <sup>7</sup>Medicine Lodge; <sup>8</sup>Rosebud, Fergus; <sup>9</sup>Box Elder, Riddle, Curlew Valley, Magic Valley, Whitehorse, Elko, Humboldt; <sup>10</sup>Blue Mountain CO, Cold Springs, Rich, Diamond, Blue Mountain UT, Kemmerer, Farson, Rawlins, North Park, Eagle, Strawberry.

### Recent Evolutionary History of Greater Sage-Grouse

Clades I and II exhibit different mismatch distributions (Fig. 7) and Clade I was consistently less variable (Clade I:  $k = 1.62$ ,  $\pi = 0.0129$ ,  $h = 0.76$ ; Clade II:  $k = 2.52$ ,  $\pi = 0.019$ ,  $h = 0.84$ ). There is no evidence of two clades in the microsatellite data. However, because of the mode of inheritance of these bi-parental, nuclear markers, evidence of two clades would be erased with recombination and interbreeding.

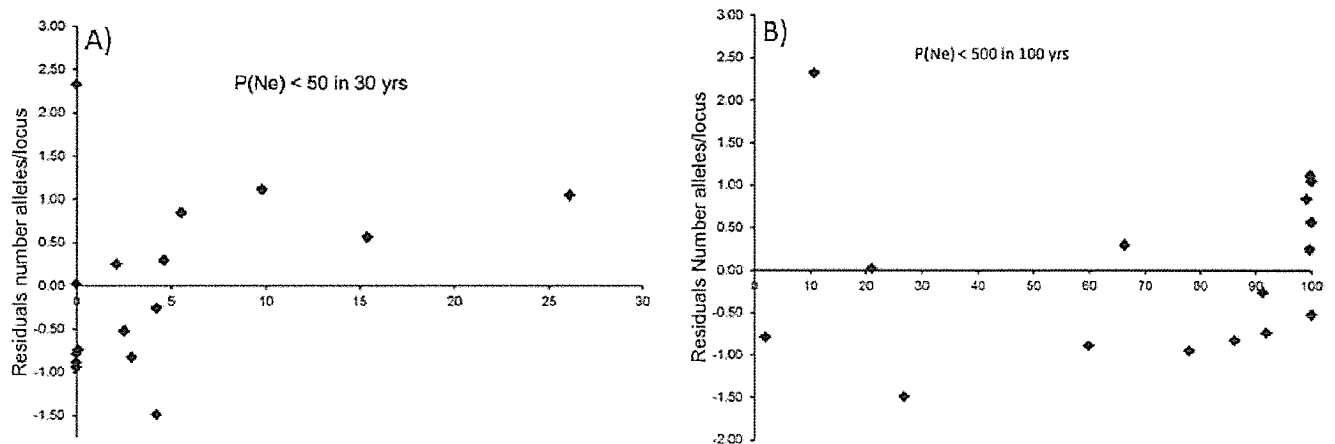
### DISCUSSION

Based on analyses of lek counts over several decades, greater sage-grouse have declined over much of their range [20], although the exact nature of the decline is unclear. Most assessments suggest population declines of from 17-

47% [e.g., 21, 22] concluded from lek counts that the population declined by 2.0% per year from 1965 to 2003, and Schroeder *et al.* [23] suggested that the species currently occupies 56% of its pre-European settlement distribution. Given the lack of quantitative historical surveys that can be compared to current quantitative censuses, these estimates of range contraction are educated guesses. Nonetheless, it appears that not all regions have decreased to the same level, and some populations appear to be stable or increasing. The variability in degree of decline provides an opportunity for assessing the congruence of estimates of population trends and genetic variation. Oyler-McCance and Quinn [24] noted that estimates of population structure and gene flow in greater sage-grouse, i.e., connectivity of populations, as well as levels of genetic diversity "are paramount for

**Table 4.** Correlations among demographic and genetic variables for the 16 population units of greater sage-grouse described in [4]. Values in parentheses are for correlation coefficients excluding the two Columbia Basin populations. Asterisks indicate standard statistical significance levels (\*  $P < 0.05$ , \*\*  $P < 0.01$ , \*\*\*  $P < 0.001$ ); see text for significance levels if applying Bonferroni corrections.

	Number active leks	Number males/active lek	Total males	Het (ave)	Ave. No. alleles (resid)	mtDNA h	mtDNA $\pi$	Decline in best model	P(Ne) < 50 in 30 yrs
Number males/active lek	0.492								
Total males	0.978**	0.568*							
Het(ave)	0.353	0.265	0.305						
Ave. No. alleles(resid)	0.401	0.254	0.498	-0.468					
mtDNA h	0.324	0.374	0.274	0.614*	-0.197				
mtDNA $\pi$	0.265	0.300	0.199	0.436	-0.078	0.873***			
Decline	-0.373	0.054	-0.287	0.231	-0.136	-0.026	-0.030		
P(Ne) < 50 in 30 yrs	-0.359	-0.411	-0.310	-0.737** (-0.499)	0.399	-0.726** (0.257)	-0.558* (0.406)	0.161	
P(Ne) < 500 in 100 yrs	-0.432	-0.744** (-0.733**)	-0.480	-0.295	0.09	-0.171	-0.084	0.009	0.463

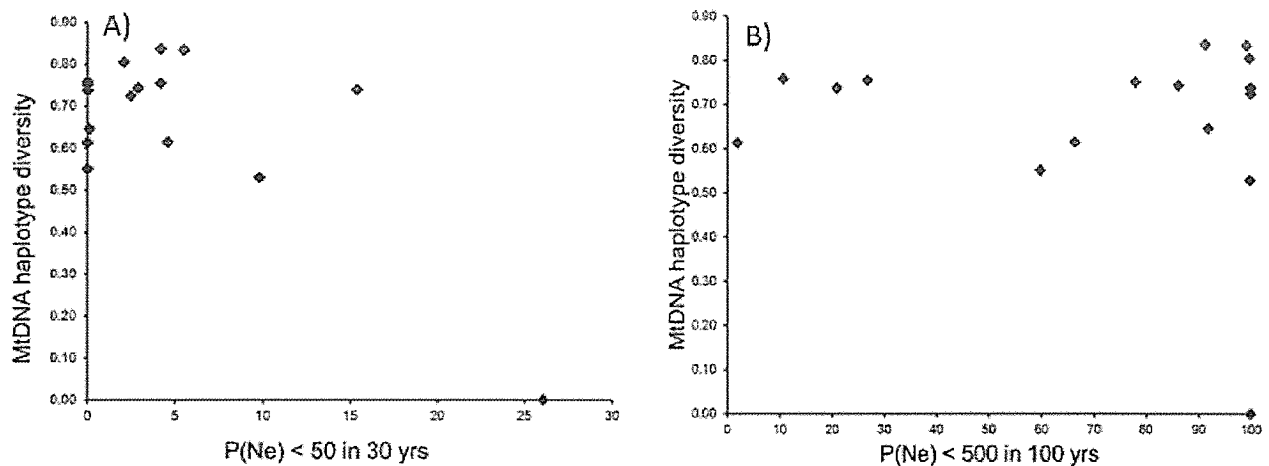


**Fig. (3).** A) Plot of the residual number of alleles/locus for the seven microsatellite loci [1] versus the P(NE) < 50 in 30 yrs [4] for the 16 population samples of greater sage-grouse, showing a lack of a relationship. B) Plot of the residual number of alleles/locus for the seven microsatellite loci [1] versus the P(NE) < 500 in 100 yrs [4] for the 16 population samples of greater sage-grouse, showing a lack of a relationship.

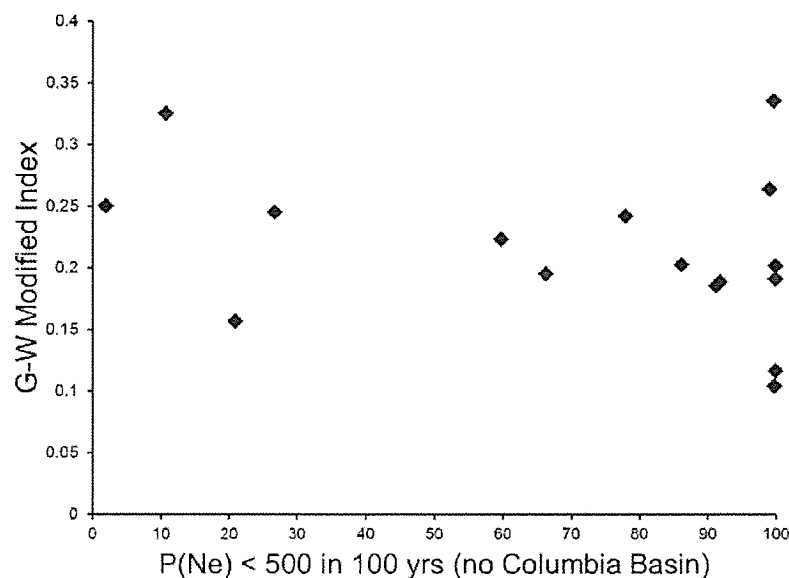
conservation efforts.” Oyler-McCance *et al.* [1:1308] stated that “genetic data used in conjunction with large-scale demographic and habitat data will provide an integrated approach to conservation efforts for the greater sage-grouse”. This is the tact taken in this analysis.

Thousands of studies have been published that include “conservation genetics” in their key word section (*Google Scholar* search 16 February 2014). For the majority, there are no corresponding demographic data that can be used to compare with the genetic data. Hence, results from genetic analyses are often taken as proxies of past population demography. For example, Schmidt *et al.* [25] stated that lower mtDNA and microsatellite variation was associated with

bottlenecked populations in the Eurasian lynx (*Lynx lynx*) although data on population histories consisted of verbal descriptions such as “The Scandinavian population...is believed to number up to 2000 individuals...is now large and appears to be growing rapidly.” Part of the lack of quantitative data on populations stems from the difficulty in observing lynx in the field, making more easily observable species such as the greater sage-grouse better suited to obtaining quantitative estimates of population demography. In fact, the genetic analyses [1] and the demographic results [4] represent one of the most extensive opportunities to compare these logically interrelated data sets.



**Fig. (4).** **A)** Plot of the relationship between  $P(N_e) < 50$  in 30 years [4] and mtDNA haplotype diversity [1] for greater sage-grouse, showing a lack of a relationship. **B)** Plot of the relationship between  $P(N_e) < 500$  in 100 years and mtDNA haplotype diversity in greater sage-grouse showing a lack of a relationship.



**Fig. (5).** Plot of the Garza-Williamson inbreeding index [7] versus  $P(N_e) < 500$  in 100 years [4] excluding the Columbia Basin populations for greater sage-grouse, showing a lack of a relationship.

### Do Measures of Population Trends Explain Genetic Patterns of Variation or Reveal Inbreeding?

Levels of genetic variability should co-vary with long-term population fluctuations. Populations in decline ought to show reductions in heterozygosity, number of alleles/locus, and nucleotide and haplotype diversity. However, it is known that heterozygosity will only show a response to demographic declines if a bottleneck is severe and long term [26], whereas the number of alleles or haplotypes per locus is more sensitive to population fluctuations.

There was no evidence that average number of alleles or haplotypes per population co-varied with estimates of population trends (16 populations) or between measures of genetic variability and number of active leks or males/active lek (45 populations). Thus, the expected population genetic signatures of differences in population size were not ob-

served. Importantly, the insignificant correlation between the G-W indices and measures of population trends suggests that populations, whether declining, increasing or stable, are not showing signs of inbreeding. This casts other studies of genetic variation alone in a different perspective, as one might not be able to infer that populations with low genetic variability are necessarily declining. In addition, Ramey *et al.* [27] detected several potential errors in the calculations of Garton *et al.* [4], although these errors would likely result in less severe estimated declines and lower probabilities of populations being less than 50 or 500 in 30 or 100 years. Hence, analyses presented here potentially evaluated a “worst-case” scenario.

One clear genetic pattern is that the remaining populations in the Columbia Basin exhibit low levels of heterozygosity and numbers of alleles/locus. Although the remaining leks possess an average number of males, their isolation ap-

parently has precluded the maintenance of genetic variability. For example, the mtDNA estimate of gene flow (Slatkin's  $N$ ) averaged 15.4 among all populations excluding the two from the Columbia Basin, whereas an average of only 1.9 immigrants was exchanged between the Columbia Basin and the remaining populations. Hence, isolation from gene flow of the nature observed in Washington likely leads to reduced genetic variability and clearly poses a potential risk to population persistence. However, throughout the rest of the range, there are no similar situations, with the possibility of the population in Lyon/Mono (see below). In fact, in a small population in Alberta, Bush *et al.* [28:343] remarked: "Although the species is endangered in Alberta and occurs in fragmented habitat, it has maintained genetic diversity and connectivity." This was explained as a result of successful dispersal of breeding individuals among leks. Given this level of connectivity at the northern fringe of the current range, it stands to reason that at least this much dispersal and gene flow exists in southern and more continuous portions of the range. It is possible that the lack of a relationship between estimated degree of population decline and levels of genetic variability is that there is still sufficient inter-area dispersal to counteract local population declines and genetic drift.

Populations with high probabilities of  $P(N_e) < 50$  or 500 were already on a historically decreasing population trajectory, given that these calculations were based on lek counts over the past several decades. Possible reasons for a lack of expected genetic signatures-include a high level of gene flow or an inability of available genetic measures to capture population declines owing to a lag effect [e.g., 29]. For example, although the Iberian lynx (*Lynx pardinus*) has decreased from a total population of 1100 individuals in the 1980s to 100 individuals distributed in two isolated populations today, Casas-Marce *et al.* [2] were unable to show genetic effects of bottlenecks in a sample of 36 polymorphic microsatellite loci. However, in randomly sampling from the 1181 individuals for which microsatellite data were available, there are strongly reduced levels of alleles/locus in population samples identical in size to those analyzed in this study

(Zink, unpubl. data). Thus, the lack of a relationship between genetic and  $P(N_e < 50, 500)$  in greater sage-grouse is likely not an artifact of the sensitivity of the genetic markers compared.

### Evolutionary History of Greater Sage-Grouse

An understanding of the past evolutionary history of a species can provide useful perspective on current populations and their distributions, and how the species might respond to future climate change scenarios. The two historically divergent mtDNA lineages (Clades I and II) might have originally corresponded to small-bodied (Clade I) and large-bodied (Clade II) birds. If these two clades had always been part of an interbreeding population, there should not be genetic differences between two clades from the same mtDNA gene genealogy. Based on differences in mismatch distributions (Fig. 7) and associated estimates of variability, these two clades likely represent once geographically and genetically independent lineages that retained the ability to interbreed. In my opinion there is no relevant calibration for a short section of mtDNA control region to determine the age at which these two clades last shared a common ancestor, but the degree of divergence (ca. 15%) is consistent with a Late Pleistocene, if not earlier, origin [30]. Niche models suggest a refugium for Clade II individuals in the southeastern portion of the range, and it would appear that these two clades were isolated as recently as the Last Glacial Maximum (Fig. 6). Post-glacial range expansion resulted in a pattern where members of each historical clade are now co-mingled over much of their range [1], owing to a northward spread of Clade II individuals, and an eastern expansion of clade I individuals. However, the low frequency of individuals bearing Clade I haplotypes in the northeastern part of the range (eastern Montana, Dakotas, northeastern Colorado) could mean that demographic equilibrium has not yet been reached. Alternatively, there could be an as yet unidentified adaptive reason for the nonrandom spatial distribution of haplotypes. Lastly, the potentially isolated refuge for Clade II individuals (Fig. 6B) might explain why current populations have relatively reduced levels of genetic variability.

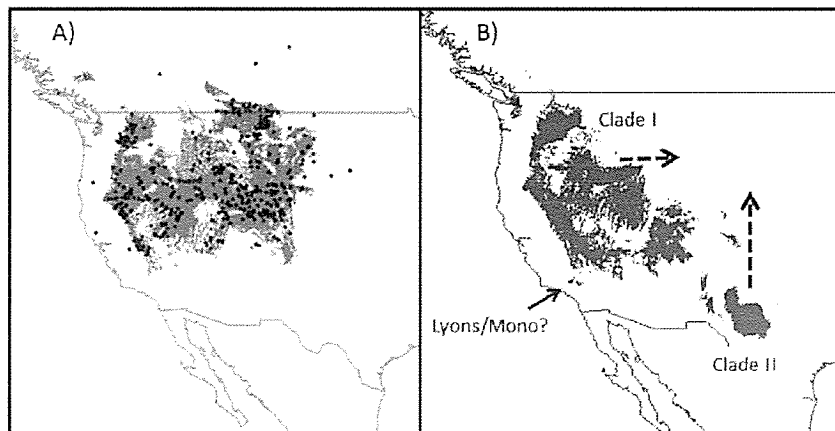
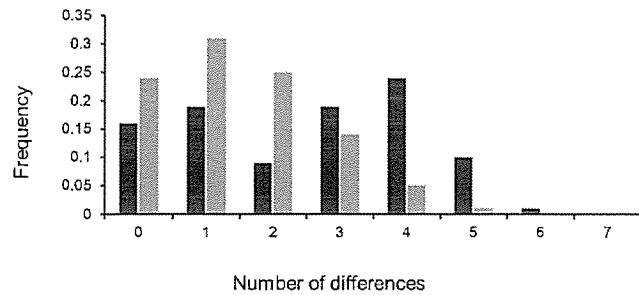


Fig. (6). Map of niche models showing predicted distributions of greater sage-grouse at the A) present and B) Last Glacial Maximum (LGM; 21,000 ybp). Blackened circles show locality points used to develop climate niche model. The arrow on the right panel indicates a possible refugium for the Lyons-Mono population that is today genetically differentiated. This distribution of Clade II could correspond to populations today considered the Gunnison sage-grouse (*Centrocercus minimus*).





**Fig. (7).** Distribution of pairwise differences for Clade I (black bars) and Clade II (gray bars) mtDNA haplotypes [1]. The differing distributions suggest that the two clades of greater sage-grouse were once allopatric and had independent demographic histories until they were reunited following glacial retreat.

The projected LGM distribution (Fig. 6) indicates a southerly outpost of sage-grouse that might represent the current Lyon-Mono population. This population, which is more genetically differentiated from the rest of greater sage-grouse than greater sage-grouse is from the Gunnison sage-grouse (*Centrocercus minimus*), has been proposed as a distinct population segment [31]. However, despite the large number of unique alleles in the Lyon-Mono population, the level of genetic divergence is similar to that among other greater sage-grouse populations. The Lyon-Mono population has similar levels of variability relative to other populations, but not to the low extent found in the Columbia Basin populations (Tables 1, 3).

Thus, niche modeling suggests both stability (western) and range displacement (eastern) of greater sage-grouse over the past 120,000 years. They have survived the last glaciation and responded by shifting their ranges as climates ameliorated and associated vegetation was redistributed over western North America.

### Comparison of Molecular Markers

Many authors have concluded that estimates of mtDNA variation and differentiation are insufficient to describe population variation or lineage divergence owing to stochasticity inherent in any single-locus [32, 33]. MtDNA has been used extensively over the past two decades in phylogeography and conservation genetics, and has been complemented by surveys of nuclear loci, either microsatellites or sequencing [34, 35]. In this study, mtDNA and microsatellites were available for the same 45 populations, and although the original authors [1] did not make explicit comparisons, it is noteworthy that the two markers gave similar estimates of levels of variation and population differentiation for data set I (Table 2) although less strongly for data set II (Table 4).

### CONCLUSION

There is no clear evidence that the population genetic variability of the greater sage-grouse has been influenced by range reduction and fragmentation. The microsatellite data suggest that despite past population trends, there is no evidence of heightened inbreeding in smaller populations. Indeed, over deep evolutionary time, populations ebb and flow. Only in the case of the geographically isolated Columbia Basin populations is there a demonstrable effect of popula-

tion declines and loss of genetic variability, but even in these populations there is no clear evidence of inbreeding. Because genetic variability is thought to be a proxy for population health, it does not appear that demographic declines have reached a point where genetic variation is affected in greater sage-grouse, with the exception of the Columbia Basin populations.

### CONFLICT OF INTEREST

The authors confirm that this article content has no conflict of interest.

### ACKNOWLEDGEMENTS

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### SUPPLEMENTARY MATERIALS

Supplementary material is available on the publishers web site along with the published article.

### PATIENT'S CONSENT

Declared none.

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United States Department of Agriculture

COPY

APR 25 2014

The Honorable John Hickenlooper  
Governor, State of Colorado  
Chairman, Western Governors' Association  
400 North Capitol Street, N.W., Suite 376  
Washington, D.C. 20001

Dear Governor Hickenlooper:

Thank you for your letter of March 25, 2014, cosigned by Governor Brian Sandoval of Nevada, expressing appreciation and support of voluntary conservation efforts, such as those undertaken as part of the Department of Agriculture (USDA), Natural Resources Conservation Service's (NRCS) Sage-Grouse Initiative (SGI).

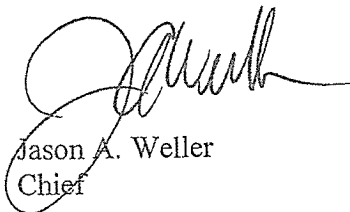
My objective for the collective SGI efforts, "on-the-ground" conservation work and the results of science-based evaluations documenting the effectiveness of that work have always been to support a "not-warranted" listing decision for sage-grouse. I still believe this objective is possible.

NRCS remains committed to working with the U.S. Fish and Wildlife Service to increase the visibility and consideration of voluntary conservation efforts within the legal framework of the Endangered Species Act. I welcome assistance the Western Governors' Association is willing to offer in this regard.

Enclosed are answers to your questions explaining NRCS SGI. I hope the responses are useful. Please let me know if you need additional information.

Again, thank you for writing and for your continued conservation efforts for the greater sage-grouse. An identical letter has been sent to Governor Sandoval.

Sincerely,



Jason A. Weller  
Chief

Enclosure

Natural Resources Conservation Service  
Post Office Box 2890  
Washington, D.C. 20013  
An Equal Opportunity Provider and Employer

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Enclosure

***1. How much money has NRCS invested (through the SGI and other programs) in sage-grouse conservation between 2010 and 2013? What dollar amount did landowners and other partners contribute for these activities over the same period?***

A total of \$354.3 million has been invested through the Sage-Grouse Initiative (SGI) from fiscal years (FY) 2010 to 2013 to strategically address threats facing sage-grouse and western rangelands. Of this total, NRCS provided \$246.8 million, while partners and landowners invested an additional \$107.4 million.

NRCS primarily fuels SGI through individual contracts with ranchers offered from Farm Bill conservation programs, including the Environmental Quality Incentives Program, Wildlife Habitat Incentive Program, Farm and Ranch Lands Protection Program, Grasslands Reserve Program, and the Wetlands Reserve Program. NRCS and partners invested \$338.4 million through these programs, resulting in direct on-the-ground conservation (Table 1). Examples include developing grazing management practices to maintain nesting cover, removal of encroaching conifers that have invaded former historic sagebrush-steppe, securing conservation easements to keep working lands working as intact range in perpetuity, and making fences more visible to reduce sage-grouse collisions.

Additionally, NRCS and partners invested \$14.7 million through a creative partnership called the SGI Strategic Watershed Action Team (SWAT). This agreement teams NRCS with over 40 conservation partners, including many State agencies, to expand field-delivery capacity, communications, and science. SWAT has been highly effective, resulting in a doubling of SGI implementation. We've further bolstered our investments in science to quantify resulting benefits of applied conservation with a \$1.2 million investment through the Conservation Effects Assessment Project.

*Table 1 - Sage Grouse Initiative: Number of NRCS agreements, contracts, projects, and financial dollars obligated for fiscal years 2010-2013.*

- a) Source 2010: EQIP/WHIP data were queried from NRCS' ProTracts October 1, 2010, GRP data from NEST as of March 2011. Note: The FY 2010 tabular summary for SGI does not reflect contracts developed in Nevada. Six EQIP contracts were developed for a total obligation of \$1,136,303, but were not coded in the system. In addition, Oregon used EQIP to fund 8 EQIP contracts (\$451,107) to benefit Sage Grouse.
- b) Source 2011: EQIP/WHIP data were queried from NRCS' ProTracts 10/1/2011 with 12/24/2012 file update, FRPP/GRP/WRP data derived from State office spreadsheets, 10/19/2011 (Acreages estimates from Program Manager 8/22/2012), State program manager estimates for CO and NV GRP acreages 10/12/2012.
- c) Source 2012: EQIP/WHIP data were queried from NRCS' ProTracts 10/2/2012, NRCS' FMMI query via state office for FRPP and WRP financial information as of 4/25/13-4/30/13 obtained through state program manager query 4/25/13, GRP Financial Assistance from LTP-50 "Agreement to Purchase Conservation Easement" obtained through state program manager query 4/25/13-4/30/13.

d) Source 2013: EQIP/WHIP data were queried from NRCS' ProTracts 10/25/2013, FRPP/GRP/WRP data derived from State office spreadsheets, 3/17/2014.

State	Environmental Quality Incentives Program			Wildlife Habitat Incentive Program			Farm & Ranchland Protection Program		
	No. of Contracts	FA Obligated	Acres	No. of Contracts	FA Obligated	Acres	No. of Contracts	FA Obligated	Acres
California	55	\$9,552,540	358,308	21	\$2,615,732	49,109	0	\$0	-
Colorado	20	\$1,936,841	63,439	5	\$186,429	10,060	12	\$16,372,500	47,776
Idaho	96	\$8,121,491	434,114	6	\$173,942	18,168	0	\$0	-
Montana	38	\$8,333,599	435,585	25	\$1,319,513	26,181	3	\$4,000,000	46,278
Nevada	36	\$3,862,856	378,966	22	\$1,303,027	15,561	1	\$5,001,790	4,064
North Dakota	47	\$1,716,541	88,797	6	\$243,504	14,935	0	\$0	-
Oregon	93	\$10,576,761	129,573	44	\$3,366,781	38,190	0	\$0	-
South Dakota	24	\$2,939,423	175,093	16	\$1,656,809	78,976	0	\$0	-
Utah	46	\$5,775,471	85,270	4	\$308,788	10,165	0	\$0	-
Washington	94	\$4,139,919	49,327	10	\$793,296	24,183	0	\$0	-
Wyoming	80	\$12,606,629	884,026	18	\$1,485,650	76,591	49	\$49,001,116	120,372
<b>Total</b>	<b>629</b>	<b>\$69,562,072</b>	<b>3,082,499</b>	<b>177</b>	<b>\$13,453,472</b>	<b>362,118</b>	<b>65</b>	<b>\$74,375,406</b>	<b>218,490</b>

Table 1 continued.

State	Grassland Reserve Program			Wetlands Reserve Program			Grand Total		
	No. of Contracts	FA Obligated	Acres	No. of Contracts	FA Obligated	Acres	Contracts/Agreements	FA Obligated	Acres
California	1	\$1,464,710	2,037	0	\$0	-	77	\$13,632,982	409,454
Colorado	13	\$5,559,005	6,564	0	\$0	0	50	\$24,054,775	127,839
Idaho	33	\$21,504,694	52,617	0	\$0	-	135	\$29,800,127	504,899
Montana	4	\$4,085,982	10,742	0	\$0	-	70	\$17,739,094	518,786
Nevada	4	\$10,942,582	6,466	8	\$14,476,657	10,757	71	\$35,586,913	415,814
North Dakota	0	\$0	-	0	\$0	-	53	\$1,960,045	103,731

Oregon	0	\$0	-	0	\$0	-	137	\$13,943,542	167,762
South Dakota	0	\$0	-	0	\$0	-	40	\$4,596,232	254,069
Utah	8	\$7,423,395	33,765	0	\$0	-	58	\$13,507,654	129,200
Washington	0	\$0	-	0	\$0	-	104	\$4,933,215	73,510
Wyoming	11	\$13,530,651	40,222	0	\$0	-	158	\$76,624,046	1,121,211
<b>Total</b>	<b>74</b>	<b>\$64,511,019</b>	<b>152,412</b>	<b>8</b>	<b>\$14,476,657</b>	<b>10,757</b>	<b>953</b>	<b>\$236,378,626</b>	<b>3,826,273</b>

**2. How many acres were put into conservation easements through SGI from 2010-2013? How many additional acres also received other conservation treatments -- such as conifer removal, new grazing systems, and fence marking/removal -- during that same period?**

Through SGI, we partner with 953 ranches to implement conservation on 3.8 million acres across 11 Western States. Conservation practices are designed to address primary threats and targeted in priority landscapes containing the majority of birds. SGI uses outcome-based science to quantify the biological benefits of conservation, to assess effectiveness, and adaptively improve delivery. Listed is a summary of SGI accomplishments from FY 2010-FY 2013.

- Reduced the overarching threat of fragmentation by preventing subdivision of large and intact ranches through the establishment of 381,659 acres of conservation easements. These investments work in tandem with State and Federal policy to maximize benefits to birds. As an example, conservation easements in Wyoming are expected to help reduce by two-thirds anticipated bird losses by embedding conservation easements inside Wyoming's core areas (Copeland et al. 2013-PLos One).
- Additional hiding cover is expected to increase sage-grouse numbers by 8 to 10 percent within the 2.6 million acres of grazing systems implemented (Doherty et al. in press-Wildlife Biology).
- We have tripled the chance of maintaining viable populations by removing 276,250 acres of invasive conifer in core habitats and prevented a loss of 60 percent of the available forage (Baruch-Mordo et al. 2013- Biological Conservation; McClain 2012- MS Thesis).
- Preventing 2,800 sage-grouse fence collisions annually and reduce fence strike risk by 83 percent by marking or moving 537 miles of "high-risk" fence (Stevens et al. 2013-WSB).

**3. What has been the trend in SGI enrollments? Did you see a change in enrollments after the U.S. Fish and Wildlife Service (FWS) proposed listing the Bi-State distinct population segment (DPS) of greater sage-grouse as threatened and, if so, by how much?**

Since inception in 2010, agricultural producers across the West have embraced the voluntary and incentive-based approach to conservation offered through SGI. Producer interest has remained consistently high over the 4-year period with NRCS enrolling an average of 238 SGI participants each year (224 in FY 2010, 239 in FY 2011, 253 in FY 2012, and 237 in FY 2013).

The Bi-State DPS is included as a key part of SGI's conservation strategy. This unique landscape straddling the California and Nevada borders is comprised mostly of federally owned

public lands (92 percent) and ranchers here rely on their continued use of Federal grazing allotments to make their agricultural operations viable. Although Federal lands dominate the landscape, much of the water is located in irrigated meadows on the privately owned lands and is critical to sage-grouse brood survival. Top priorities for Bi-State conservation are establishing conservation easements on private lands to ensure critical brood habitats remain and removing encroaching conifers that degrade habitats and increase predation.

Initial interest and SGI participation from Bi-State landowners was low, resulting in only \$155,000 in SGI projects in FY 2010. Producer interest has grown each successive year and SGI investments have accelerated significantly. Through FY 2013, we finalized contracts for \$26 million of on-the-ground Bi-State projects addressing critical threats identified in the 2012 Bi-State Action Plan; primarily the establishment of perpetual conservation easements, removal of encroached conifer, and restoration of wet meadows to improve brood rearing habitat (Table 2).

*Table 2- Funding totals including both CA and NV*

Year	EQIP	WHIP	GRP	WRP	FRPP*	Total SGI \$
2010	\$119,778	\$36,209	\$ -	\$ -	\$ -	\$155,987
2011	430,294	90,353	-	-	-	520,647
2012	234,642	31,367	2,218,565	278,400	11,400,000	14,162,974
2013	303,447	47,492	9,570,557	0	1,240,000	11,161,496
<b>Totals</b>	1,088,161	205,421	11,789,122	278,400	12,640,000	<b>26,001,104</b>

*\* FRPP funding includes cooperative partnership dollars.*

Although we experienced significant growth in Bi-State SGI participation in the period of FY 2010 through FY 2013, landowner interest has declined precipitously in FY 2014 (Figure 1). While several factors likely influence landowner participation, it appears this decline is associated with the FWS proposal to list the bird in the fall of 2013. There were 13 producers who had submitted early SGI applications for FY 2014 funding and withdrew their applications shortly after the listing announcement. Many expressed continued desire to participate in SGI, but are fearful that listing of the Bi-State sage-grouse will reduce or eliminate their use of Federal grazing allotments, thereby rendering their private agricultural operations unviable. Today, our FY 2014 applications total 3, down from 24 the prior year (FY 2013). None of the FY 2014 applications are for establishment of new conservation easements.



**4. How would a threatened or endangered listing of the greater sage-grouse affect NRCS's investment in sage-grouse conservation? Do you anticipate that landowners and other partners will still want to participate in SGI under a listing scenario?**

NRCS is determined to provide SGI support until the threats facing sage-grouse are addressed.

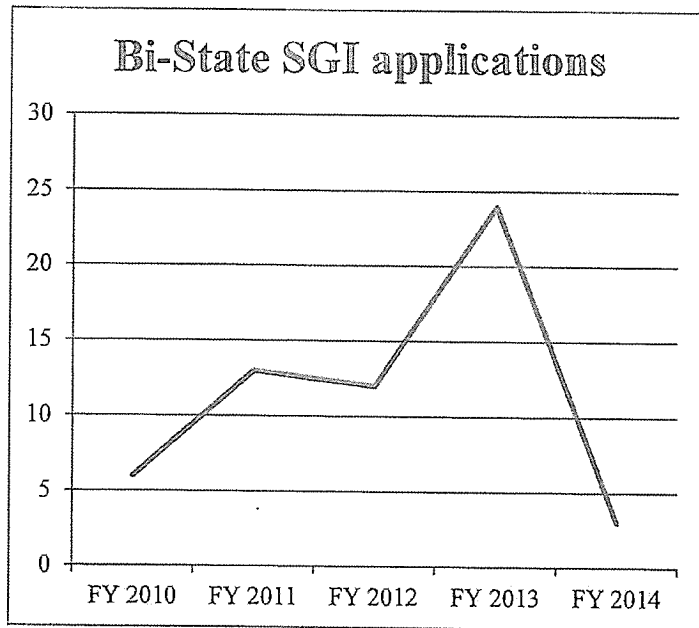
It is important to note, however, that NRCS does not directly implement any conservation practices on our own. Instead, our voluntary and incentive-based approach depends completely on the willingness of private landowners to voluntarily sign up, agree to implement beneficial practices, and invest their own resources to put conservation on the ground. Because of this, any action, such as an Endangered Species Act (ESA) listing, or otherwise, that negatively impacts private landowner desire ultimately affects our ability to implement SGI in the future. Additionally, new critical habitat designations for sage-grouse could also increase NRCS consultation requirements and impact landowner desire to participate.

To help address landowner concerns regarding additional ESA regulations, NRCS partnered with FWS in 2010 and created the first-ever Sage-Grouse Conference Report. SGI participants benefit by obtaining "ESA predictability" meaning that if sage-grouse are ultimately listed under ESA, landowners can continue implementing approved practices on their private lands and still be in full compliance with the law. This approach is likely to be effective for producers who primarily operate on private land. Our agreement does not offer similar predictability for public land allotments and a solution for this concern is needed as the majority of western ranches operate on a combination of public allotments and private land.

Predicting future landowner and partner participation if sage-grouse are listed is very hard. SGI is based on the belief that we can achieve wildlife conservation through sustainable ranching and adherence to this vision and voluntary framework has fostered an enthusiastic and unprecedented participation rate among diverse partners and landowners across the West. Coupled with the historic actions taken by the States and other Federal land management agencies, I sincerely hope this question will remain hypothetical and we will succeed by proactively conserving sage-grouse and avoiding ESA designation altogether.

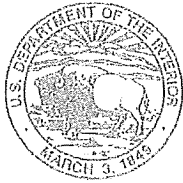
**5. If the greater sage-grouse is not listed under the Endangered Species Act, will NRCS continue to provide funding for voluntary conservation efforts and if so, at what level?**

SGI is not a program, rather it is a strategic way of delivering many existing Farm Bill programs to achieve desirable outcomes. This is the premise of all of our Landscape Conservation



Initiatives designed to focus necessary resources to solve conservation challenges of national importance. Working together over the past 4 years, we have improved the outlook for sage-grouse and have implemented unsurpassed conservation on a watershed scale. We also recognize the significant threats facing sage-grouse and the need for a sustained long-term investment from all of us to finish the job. I cannot commit to a specific future monetary or program contribution level, but I can assure you that SGI will remain a highly prioritized and desirable business model for NRCS as long as it continues to net positive conservation outcomes.

C



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Washington, D.C. 20240

MAY 13 2014

The Honorable Gary R. Herbert  
Governor of Utah  
Salt Lake City, Utah 84114-2220

Dear Governor Herbert:

Thank you for your January 3, 2014, letter regarding conservation of the greater sage-grouse. We recognize the meaningful efforts supporting greater sage-grouse conservation across the species' range and in Utah. We appreciate your collaboration with us as we work towards our 2015 listing decision. Conservation efforts implemented by Utah and its federal, state, local, and tribal partners, include pinyon-juniper removal, sagebrush restoration, and seeding projects. Furthermore, Utah and its partners have focused efforts on surveys and monitoring of this species, which have provided population and habitat information to help guide conservation efforts.

As your letter points out, Utah is in the process of implementing its February 14, 2013, Conservation Plan for Greater Sage-grouse in Utah (Plan). Your Plan's strengths lie in its ambitious goals and objectives to protect habitat which provides for the year-round life-cycle needs of the species, perpetuate conditions necessary to ensure recruitment of a continuing population, and enhance or improve sage-grouse habitat through restoration or rehabilitation activities.

In our April 29, 2013, letter to Kathleen Clarke we provided several recommendations to strengthen the State's Plan. Many of our recommendations were specific to avoiding and minimizing impacts to sage-grouse populations and their habitats from land use activities, including recommendations to 1) consider a maximum 3 percent surface disturbance limit in priority sage-grouse habitats regardless of landownership, 2) protect leks and nesting habitats using a 4-mile lek buffer, 3) avoid construction of infrastructure in sage-grouse habitat, and 4) include conservation of the Anthro and West Tavaputs sage-grouse populations—these populations are primarily on federal lands in the otherwise largely non-federally owned Carbon PAC (see Table 1, below), and are important for habitat and population connectivity in northeastern Utah. We provided the BLM and USFS with similar and additional recommendations to avoid, minimize, and mitigate impacts to greater sage-grouse under their Greater Sage-Grouse Land Use Plan Amendment (LUP) DEIS (letter to BLM dated January 31, 2014). The BLM LUP amendment will provide policy and regulatory provisions for land use activities occurring on federal lands across the range of the greater sage-grouse.

In our April 29, 2013, letter we also urged that the State consider the use of regulations and policies to ensure the implementation of conservation measures on non-federal lands. As you indicated in your letter, the State's Plan is based largely on the use of voluntary incentives on non-federal lands, and we commend your efforts to work with partners, conduct habitat treatments, and provide funding to address fire control and rehabilitation needs.

While we strongly support voluntary incentive-based programs as important components of species' conservation efforts, we also strongly recommend (as described in the COT report) the use of regulatory mechanisms as needed to address all threats to the maximum extent practicable. This is particularly important in Utah where several of the sage-grouse Priority Areas of Conservation (PAC) are comprised of large acreages of private or other non-federal lands—specifically the Box Elder (58%), Parker Mountain-Emery (28%), Rich-Morgan-Summit (81%), Strawberry (74%), Uintah (35%), and Carbon (86%) areas that are also identified as sage grouse management areas (SGMAs) in the State's Plan. Given the large proportion of greater sage-grouse populations on non-federal lands in many of the SGMAs, it is uncertain how successful the complete reliance on voluntary incentives will be for greater sage-grouse conservation in the State.

For example, several PACs/SGMAs have a large overlap of non-federal lands and development potential (Table 1). If the State is unable to obtain voluntary conservation mechanisms for greater sage-grouse on these lands, or if the conservation and mitigation measures are substantially less protective than those on neighboring federal lands, it is likely that a high degree of habitat fragmentation and loss of population connectivity will occur within and between PACs in Utah, and possibly with those in neighboring States. As another example, the Bald Hills, Box Elder, Hamlin Valley, Ibabah, and Sheeprocks, PACs/SGMAs all have high potential for loss of habitat from fire and invasive species. The BLM is developing adaptive management protocols to specifically address responses to fire, however landscape level suppression and rehabilitation efforts will be more effective if addressed equally across all land ownerships, with some regulatory mechanisms to ensure implementation.

**Table 1-Percentage of Non-Federal Lands and Development Threat**

SGMA/PAC	Percentage of GRSG Habitat on Non-Federal Land in SGMA*	Energy, Mining ,or Infrastructure listed as a primary threat**
Box Elder	58%	Yes
Carbon	86%	Yes
Panguitch	35%	Yes
Parker Mountain-Emery	28%	Yes
Strawberry	74%	Yes
Rich-Morgan-Summit	81%	Yes
Uintah	35%	Yes

\*from the State's Conservation Plan for Greater Sage-grouse in Utah-Appendix 5

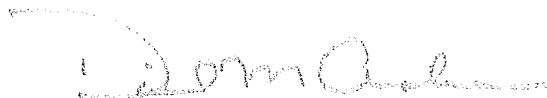
\*\*Based on COT report and BLM Greater Sage-Grouse Land Use Plan Amendment DEIS

Reversing population and habitat declines of greater sage-grouse in Utah and across its range is very challenging and we must continue to work together in order to succeed. We are committed to continuing the collaborative process of working with the State to ensure your Plan is ultimately best positioned to contribute to a future where listing the greater sage-grouse under the Endangered Species Act is unnecessary. We believe your continued coordination with us, along with a commitment to implement a conservation Plan with adequate regulatory mechanisms, will help ensure long-term viability for the species in the State.

However, should the sage-grouse become a listed species; your continued efforts toward greater sage-grouse conservation would help engage partnerships and expedite recovery.

If I can be of further assistance, please contact me at the letterhead address.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom A. Ash". The signature is written in dark ink and is positioned below the word "Sincerely,".

DIRECTOR



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pacific Southwest Region  
2800 Cottage Way, Suite W-2606  
Sacramento, California 95825

IN REPLY REFER TO:  
FWS/RS/

MAY 13 2014

The Honorable Brian Sandoval  
One Hundred One North Carson Street  
Carson City, Nevada 89701

Dear Governor Sandoval:

Thank you for taking time from your busy schedule to meet with me on May 5<sup>th</sup>. Your time and thoughts are greatly appreciated.

You asked me what states have sage grouse conservation plans that the Fish and Wildlife Service believes are good plans. I promised to respond to you. Wyoming has completed a plan that has been found sufficient by the Service. Of the other ten states that have sage grouse habitat, eight are working on plans. Oregon, Montana, and Idaho are making progress on plans that the Service hopes will sufficiently plan for conservation of sage grouse. We continue to work closely with those states as they craft approaches that would meet the objectives of the 2013 inter-agency "Conservation Objectives Team" report. This report identified areas of key habitat, the primary threats in the key areas, and objectives for reducing threats. An overarching objective of the report is to ensure the integrity of priority areas by directing human-caused habitat loss elsewhere.

Nevada's plan focuses almost entirely on the Bureau of Land Management's (BLM) actions but does not recognize the need to avoid habitat loss in good occupied sage grouse habitat. As I related during our meeting, Nevada is a key state – perhaps the key state – in conserving sage grouse and its habitat. I believe there are two key components to conserving sage grouse in Nevada: on BLM lands, do not permit actions that would result in loss of good sage grouse habitat that is occupied by sage grouse, and encourage private landowners to conserve key wet meadow habitat. While both voluntary and regulatory measures can conserve habitat in private ownership, voluntary efforts must demonstrate implementation and probability of success if they are to contribute to a finding that Endangered Species Act (ESA) protection is not necessary. Your office could be a strong force for conservation of sage grouse and its habitat and help obviate the need for federal protection under the ESA.

Without doubt, wildfire and invasive species are major threats and much needs to be done before we are confident these threats can be sufficiently ameliorated, which makes it all the more important that we address the threats that can be removed or lessened. I appreciate your offer to work with me as we approach the critical September 2015 date when the Service has to decide whether proposing federal protection is needed. Please feel free to call me at (916) 414-6467 anytime, on any issue. Again, thank you.

Sincerely,

Regional Director

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# Special Report to the Western Governors

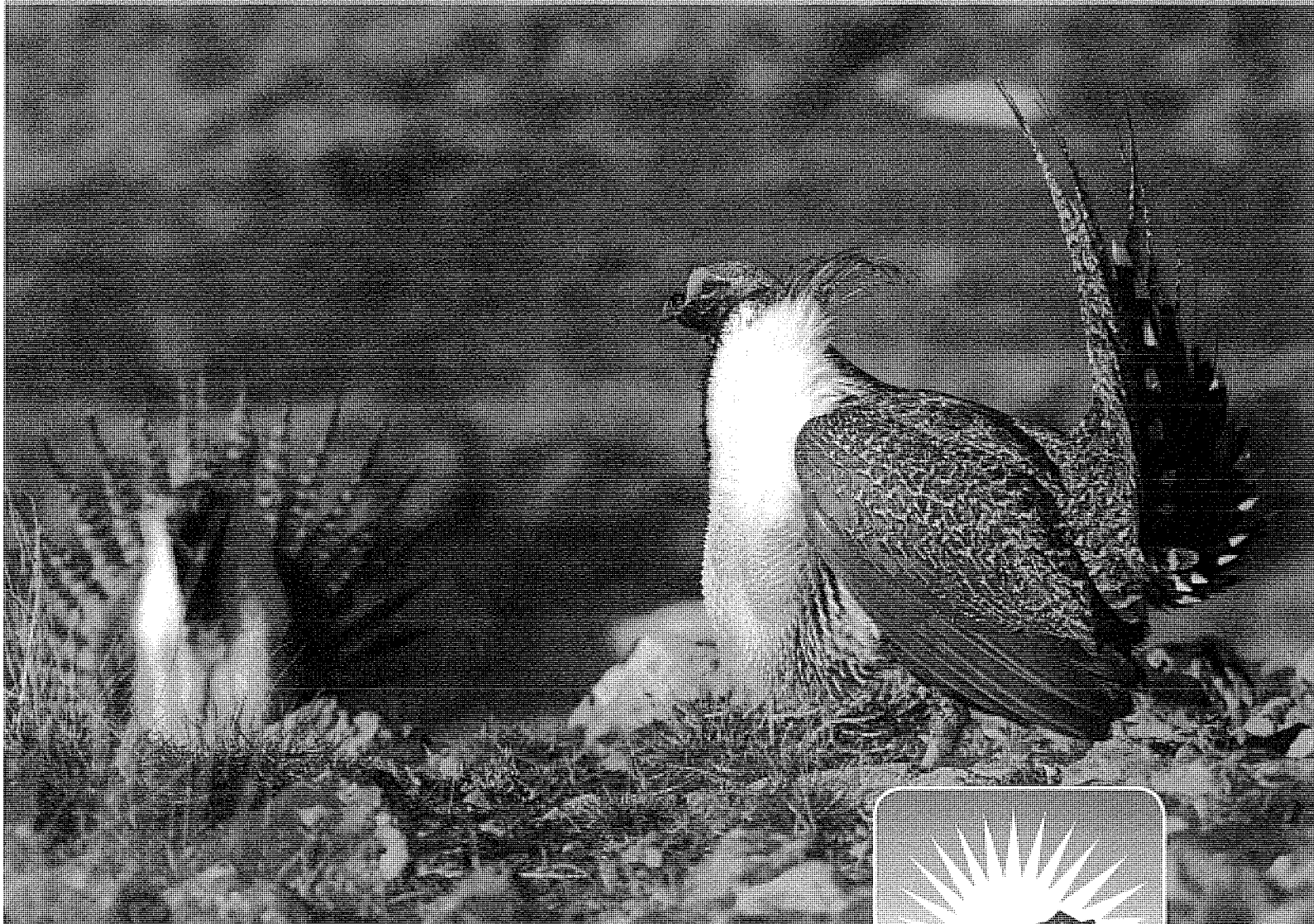


Photo: Scott Root,  
Utah Division of  
Wildlife Resources

## Inventory of State and Local Governments' Conservation Initiatives for Sage-Grouse

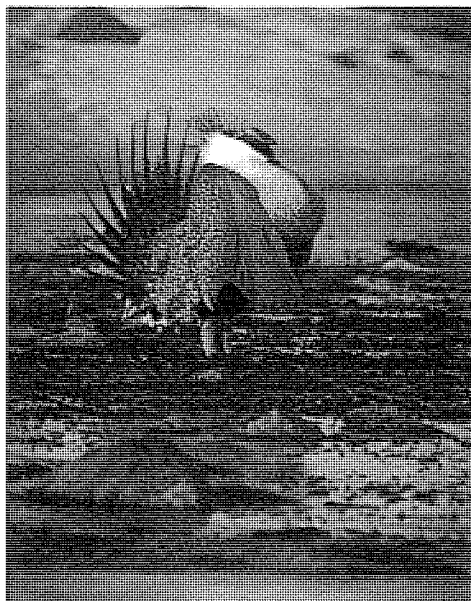
2013 UPDATE  
FEBRUARY 20, 2014

WESTERN  
GOVERNORS'  
ASSOCIATION

## About This Inventory

The greater sage-grouse needs large expanses of land for the stages of its lifecycle. Sagebrush, key habitat for the species, is found throughout 11 of the Western Governors' Association (WGA) member states. But today, evidence shows greater sage-grouse now occupy just 56% of their historic range.

In 2010 the U.S. Fish and Wildlife Service (FWS) listed the greater sage-grouse as "warranted but precluded" under the Endangered Species Act, meaning that the species deserves federal protections but that FWS does not have the resources to support those measures.



Lynn Chamberlain, Utah Division of Wildlife Resources

Western Governors and former Interior Secretary Ken Salazar formed the State-Federal Sage-Grouse Task Force (SGTF) in 2012 to implement high priority conservation actions and integrate ongoing efforts necessary to preclude the need for fully listing the sage-grouse. If fully listed, the economic impacts to states with sage-grouse habitat could be significant.

Since then Western states, through the WGA and Western Association of Fish and Wildlife Agencies (WAFWA), have worked collaboratively to address challenges facing sage-grouse and their habitat. With the passage of WGA Policy Resolution 11-09 (*Sage-Grouse and Sagebrush Conservation*), Western Governors demonstrated support for all reasonable management efforts necessary to avoid a threatened or endangered listing of the species.

At the Governors' request – and as a resource for FWS and the public – WGA and WAFWA created the first annual inventory in 2011 to illustrate how states and counties were taking proactive, voluntary steps to preclude the need to put the greater sage-grouse and Gunnison sage-grouse on the federal endangered species list.

Since that initial report, a second WGA inventory of sage-grouse conservation initiatives was released for 2012. This third WGA report highlights new sage-grouse conservation activities in 2013, along with an appendix that contains all initiatives reported by the relevant states and counties between 2011 and 2013.

## 2013 a busy year for Sage-Grouse Task Force

Representatives appointed by Governors from the 11 states with sage-grouse populations participated in four State-Federal Sage-Grouse Task Force (SGTF) meetings in 2013 with federal representatives from the U.S. Fish and Wildlife Service (FWS), U.S. Department of the Interior (DOI), Bureau of Land Management (BLM), U.S. Forest Service (USFS), Natural Resources Conservation Service (NRCS), and U.S. Geological Survey (USGS).

During the meetings members shared individual state and agency progress reports. Members also engaged in discussions to define the metrics that would demonstrate successful conservation of the species for FWS decision-making purposes.

The task force weighed options for addressing threats to sage-grouse, such as invasive species and wildfire. The task force, for example, commissioned a Near-Term Fire Conservation Action Team comprised of sage-grouse and fire experts. The group issued a report to the SGTF on near-term conservation actions, identifying what policy makers can do to address the wildfire threat, while recognizing the operational realities of fire response.



Scott Root, Utah Division of Wildlife Resources

## The Inventory

Western Governors' Association staff asked states and counties to update the 2012 inventory spreadsheet of state and local governments' conservation initiatives for sage-grouse. The resulting list of policies and conservation measures illustrate the methods used to conserve sage-grouse and sagebrush habitat, including: type of action taken, stage of implementation, description of the action, plus achieved and/or expected outcomes.

**California, Colorado, Idaho, Montana, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington** and **Wyoming** have reviewed and updated the inventory. Counties with inventory updates include, from Colorado: Delta, Dolores, Gunnison, Mesa, Montrose, Ouray, Saguache and San Miguel. Hot Springs County in Wyoming and San Juan County in Utah also participated. The updated data can be found in the appendix.

This inventory provides a catalog of management

approaches by state and local authorities to conserve sage-grouse and their habitat. State and local governments, and their partners, are strongly encouraged to review the elements included in this inventory and give strong consideration to the initiatives recorded here when evaluating their own sage-grouse conservation efforts.

The following is a look at conservation measures of note in the inventory.

## Working Groups

All the states have Local Working Groups (LWGs) actively engaged in sage-grouse conservation activities. Many of the groups are instrumental in overseeing implementation of sage-grouse conservation plans. Several counties also are actively involved in LWGs, such as the Crawford Area Local Working Group and the Bi-State/ Tri-County Sage Grouse Working Group.

## Conservation Plans

All states reported having greater sage-grouse conservation plans, most of which have been in existence for several years. Counties also are utilizing conservation plans for Gunnison sage-grouse, which establish goals and initiatives to ensure adequate work is being conducted to conserve the Gunnison sage-grouse and its habitat.

The office of **Idaho Gov. Butch Otter** developed and submitted a state plan of regulatory mechanism as an alternative in BLM's Environmental Impact Statement. On Nov. 1, 2013, the Idaho Governor's Alternative was named a co-preferred alternative in the BLM Idaho and Southwestern Montana Draft Land Use Plan Amendment and Environmental Impact Statement.

The state of **Nevada**, through the Governor-appointed Sagebrush Ecosystem Council, submitted a state alternative for inclusion in the Nevada and Northeast California Sub-Regional Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement (EIS). The alternative focuses on addressing the primary habitat threats of fire and invasive species, and includes regulatory mechanisms to avoid, minimize and mitigate impacts while establishing a Conservation Credit System to protect and restore critical habitat. The Council provided clarifying comments to the BLM and USFS with the intent of the state alternative being selected as the preferred plan in the Final EIS. The elements of the state alternative serve as the foundation for Nevada's state plan for sage-grouse conservation efforts.

The **South Dakota** Department of Game, Fish and Parks began revising its sage-grouse conservation plan in the fall of 2012 with expected completion in the spring of 2014. The revised plan will identify additional conservation opportunities beyond what are identified in the current management plan. The plan will also include sage-grouse

core areas, which identify the most important sage-grouse landscapes in the state.

In February of 2013 **Utah** released its final conservation plan for sage-grouse. The plan is designed to protect high quality sage-grouse habitat, enhance impaired habitat, and restore converted habitat. It also aims to eliminate threats facing the sage-grouse while balancing the economic and social needs of Utah residents. The plan provides for an incentive-based program for private, local government and school trust lands and a cooperative regulatory program on other state- and federally-managed lands. The plan focuses on conservation within 11 specific Sage-Grouse Management Areas that represent more than 90 percent of the species in Utah. The Plan Implementation Council monitors activities related to the plan.

Eight **Wyoming** LWGs completed sage-grouse conservation plans in 2007-08 and since then have been implementing conservation efforts in the form of habitat treatments, applied research, public outreach and enhanced population monitoring. In response to the 2010 FWS listing decision, the Wyoming Sage-Grouse Executive Orders and other new information, the LWGs have revised and updated their plans. All eight of the final revised plans will be presented to the Wyoming Game and Fish Commission in March 2014.

Implementation of the **Washington** State Recovery Plan for the Greater Sage-Grouse began in 2004, guiding management and research activities in the state. Activities include translocations to re-establish or augment populations, population monitoring, support of federal farm programs in greater sage-grouse management zones, establishment and prioritization of management zones, research, and support of sage-grouse management activities for agency-specific and area-specific management plans.

**Oregon's** sage-grouse conservation plan documents the state's All-Lands/All-Threats approach to sage-grouse conservation. It is tied to the SageCon Partnership co-convened by the Governor's office, BLM and NRCS. The plan documents the efforts undertaken since 2010 to reduce threats to sage-grouse conservation in Oregon and the strategies and actions (programmatic, voluntary and regulatory) the state will take in addressing gaps tied to those threats.

**North Dakota** Game and Fish developed a Sage-Grouse Nesting Resource Selection Model that predicts high, medium and low nest use locations. The model will be

used to identify priority habitat and to prioritize areas for conservation efforts.

## Initiatives

Nearly all states have initiatives to protect or enhance sage-grouse populations or sagebrush habitat. Several states have hired additional biologists to help landowners implement conservation practices such as habitat restoration, fencing removal and rangeland management.

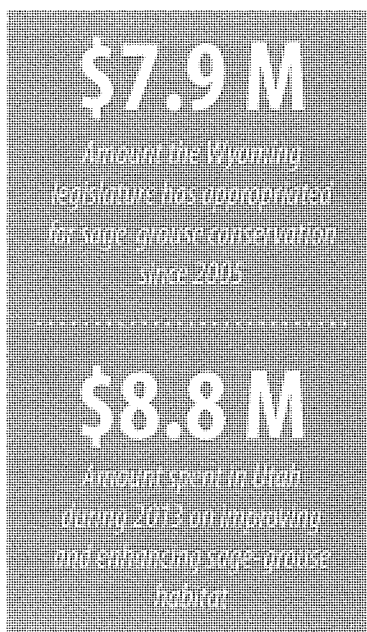
In 2013 the states of **Colorado** and **Utah**, along with nine local governments, entered into a Conservation Agreement for cooperation, collaboration and partnership for fostering conservation efforts for the Gunnison sage-grouse. **Oregon** Department of State Lands (DSL) is working with the FWS to develop a Candidate Conservation Agreement with Assurances (CCAA) for State Common School Fund Rangelands to implement conservation measures on over 610,000 acres of sage-grouse habitat. **Wyoming** also has a CCAA for greater sage-grouse. In addition, the state mapped sagebrush habitat by canopy cover category, using remote sensing and modeling efforts through a collaboration with industry, NGOs, academia and federal partners.

On the local level, 11 governments from Colorado and Utah signed a 2013 MOU creating a coalition for coordinated action to increase the abundance, viability and vitality of the Gunnison sage-grouse and its habitat. One outcome of the MOU was the execution of the Conservation Agreement between Colorado, Utah and nine local governments. It identified a commitment to amending the 2005 Gunnison Sage-Grouse Rangewide Conservation Plan, and adoption of the same, along with implementing the Habitat Prioritization Tool.

Gunnison County in Colorado utilizes a 1% county sales tax to finance the Gunnison County Land Preservation Fund. The fund generates approximately \$300,000 annually to pay for open space and conservation easements, including areas within the Gunnison Sage-Grouse Occupied Habitat. The Fund has provided funding (all or part) for 29 conservation easements, totaling 8,422 acres,

in Gunnison sage-grouse occupied habitat as of December 2013. Gunnison County also has a Gunnison Sage-Grouse Conservation Trust Fund used to fund research and habitat enhancements.

San Miguel County in Colorado has a Land Heritage Program providing private landowners with financial incentives to maintain land ownership while protecting open space and wildlife habitat.



## Executive Orders and Agreements

In 2013 Montana **Gov. Steve Bullock** issued Executive Order No 2-2013, which established a Greater Sage-Grouse Habitat Conservation Advisory Council. The council crafted recommendations for addressing the threats identified by the FWS to sage-grouse in Montana. Final recommendations will be submitted to the Governor in early 2014.

**Idaho Gov. Butch Otter** established the Governor's Sage-Grouse Task Force by executive order in 2012. **Wyoming Gov. Matt Mead** issued an Executive Order in 2011 that reiterated and clarified the intent of Wyoming's Core Area Strategy, originally developed under former Gov. Dave Freudenthal.

In May of 2013, **Washington Gov. Jay Inslee** and **Oregon Gov. John Kitzhaber** made a Declaration of Cooperation with Secretary of the Interior Sally Jewell on the Pacific Northwest Regional Infrastructure Team. This agreement recognized the need to mitigate and protect sage-grouse as energy projects are permitted.

## Statutes and Regulations

The **Washington** legislature by statute authorized the Department of Natural Resources to fight fires on non-forested land that may include sage-grouse habitat. In **Wyoming**, the legislature has appropriated \$7.9 million for sage-grouse conservation since 2005.

Seven states, up from four states in 2012, reported having regulations in effect for sage-grouse. **California, Idaho, Montana, Oregon** and **South Dakota** cited special hunting season rules

or recommendations. **Wyoming** Public Service Commission regulations ensure consistency of proposed public utility projects with the Governor's Executive Order.

The **Oregon** Statewide Planning Program provides a legal framework to protect rural lands for rural uses. The state statute is implemented through county comprehensive plans and zoning ordinances. A review conducted by the seven Oregon sage-grouse counties shows that almost all of the non-federal land identified as sage-grouse habitat is included in some type of Exclusive Farm Use Zoning District.

Under Oregon's Energy Facility Siting Standards, there is a requirement that a proposed energy facility comply with the habitat mitigation goals and standards of the Oregon Department of Fish and Wildlife.

**Nevada** has several regulations. Assembly Bill 461 formally created and gave regulatory authorization for the Sagebrush Ecosystem Program. After being approved by the state legislature, **Gov. Brian Sandoval** signed the bill into law in July, 2013. The state also has a pesticide registration fee where revenue from a fee increase will provide additional funding to the state noxious weed program. Funds from that fee will go to the statewide effort toward sage-grouse habitat conservation, as well as continue the program's ability to provide effective, efficient service in pesticide registration. The funds will also be used to fund a position on the Sagebrush Ecosystem Technical Team (SETT) and allow for greater statewide weed mapping and control efforts. This funding source will be leveraged with other federal and local sources to maximize the benefit. The state also has a Nevada Cheatgrass Action Team, a voluntary multi-disciplinary group of individuals to assist the SETT with planning and managing projects to address cheatgrass and other invasive or noxious weeds that impact greater sage-grouse habitat.

Counties are also using regulatory tools to support sage-grouse. Three **Colorado** counties—Delta, Dolores and Montrose—passed 2013 resolutions giving the counties authority to help preserve Gunnison sage-grouse and its habitat. Saguache County and Ouray County in Colorado have regulations for seasonal road closures near active leks.

## Partnerships

All states participating in this inventory take part in the **Natural Resources Conservation Service (NRCS) Sage Grouse**



Larry Dalton, Utah Division of Wildlife Resources

**Initiative.** States are also cooperating with BLM to identify strategic habitat, provide feedback on draft EISs and provide technical assistance.

In **Nevada**, collaborative funding through state and federal agencies is being used to support three new positions within the Department of Conservation and Natural Resources' Conservation District Program. The positions were created within the conservation district program to assist local conservation districts in their efforts to lead Local Area Work Group meetings and planning efforts as well as assisting the SETT with habitat evaluations, "groundtruthing" local conditions for the administration of the Conservation Credit System, and implementing sage-grouse habitat conservation projects.

There is also a new agreement in Nevada to provide additional services under the Wildland Fire Protection Program, under which the Nevada Division of Forestry and the state's counties will work closely to maintain effective wildfire management. Better wildfire management translates into reduced loss of sage-grouse habitat due to fire.

The **North Dakota** Game and Fish Department funded a cooperative monitoring project with the Little Missouri Grazing Association to identify grazing practices that are beneficial to nesting sage-grouse. North Dakota is also collaborating with local and private partners to introduce private landowners to the CCAA program with the FWS.

The **South Dakota** Department of Game, Fish and Parks has partnered with the Intermountain West Joint Venture

CONTINUED ON PAGE 8

# Major Federal Activities

## Bureau of Land Management (BLM) / U.S. Forest Service (USFS)

The BLM and USFS are currently revising and amending a total of 98 land use plans across 10 western states. By Feb. 1, 2014, all 15 planning efforts in those states associated with the National Greater Sage-Grouse Planning Strategy will have released draft versions for public review. The Wyoming 9-Plan and Oregon Draft greater sage-grouse land use plan amendments are the only two efforts that have existing open public comment periods (ending on Feb. 20, 2014, and March 24, 2014, respectively). The BLM and Forest Service expect to release proposed plans and final environmental impact statements associated with this strategy throughout the summer and fall of 2014, with the expectation that these planning efforts will be completed by year's end.

## U.S. Fish and Wildlife Service (FWS)

In March 2013, the FWS released the Conservation Objectives Team (COT) report to help guide efforts by the states and other partners to conserve the greater sage-grouse. The landscape-level strategy outlined in the report, which was developed by a team of federal and state wildlife biologists and managers, describes the conservation status of the sage-grouse, identifies the threats facing the species, and establishes long-term conservation objectives. The report represents a collaborative state and federal effort to evaluate species conservation before the FWS is required to make a decision in 2015 on whether to propose protecting the species under the Endangered Species Act. It also provides state, federal, local and private entities with permitting or land management authority with information to support conservation actions for the sage-grouse.

FWS has also worked closely with federal land managers and state wildlife agencies to help guide the development of their respective sage-grouse conservation plans at both the technical and policy levels, while at the same time building the tools for evaluating the status of sage-grouse conservation efforts in a consistent, transparent and thorough manner. Finally, FWS has invested heavily in funding research aimed at addressing key scientific questions about sage-grouse conservation, including the invasive species-fire nexus.

## Natural Resources Conservation Service (NRCS)

The NRCS-led Sage Grouse Initiative (SGI) partnership carries out conservation in 11 western states. SGI proactively conserves sage-grouse, cares for other wildlife sharing the same extensive sagebrush country, and helps ranchers pass on their rural way of life. The paradigm for at-risk wildlife works through voluntary cooperation, incentives and community support. Applying the power of the Farm Bill to target lands where habitats are intact and sage-grouse numbers are highest, SGI has invested more than \$145 million, generating \$70 million in matching contributions since 2010. As of 2013, more than 700 ranchers have enrolled and reduced sodbusting and subdivision threat on more than 240,000 acres; increased hiding cover for nesting birds on 2+ million acres; removed invading conifers on more than 200,000 acres, and marked or removed 500+ miles of high-risk fences to prevent bird collisions.

## U.S. Geological Survey (USGS)

At the request of the Western Association of Fish and Wildlife Agencies (WAFWA), the USGS led the development of a Greater Sage-Grouse National Research Strategy. The Strategy, published in 2013, was requested as a way to connect existing research and conservation plans with persisting or emerging information needs. It documents information gaps and identifies priority research topics to inform future planning and management activities. The USGS also completed a report for the BLM that summarizes several decades of work on sage-grouse populations, sagebrush as habitat, and sagebrush ecological functions. This Baseline Environmental Report (BER) summarizes scientific information in the context of threats identified in the FWS's "warranted but precluded finding." In addition, the USGS completed an analysis and mapping of ecological conditions necessary to support sage-grouse across large expanses of its range. This Ecological Minimums publication examined environmental factors surrounding 3,000 active leks, within a 355,000 square-mile portion of the sage-grouse's historic range.

(IWJV), Pheasants Forever and the NRCS to place a Farm Bill biologist position in western South Dakota, emphasizing the implementation of the NRCS Sage-Grouse Initiative.

**Montana** Fish, Wildlife and Parks, BLM, NRCS, IWJV, and Montana Association of Conservation Districts developed a partnership to purchase bulk orders of fence markers and use volunteer groups to mark fences within core areas determined to be at the highest risk for collision (using the NRCS risk model).

## Programs

Annual sage-grouse lek counts, which establish population trends and habitat protection needs, are featured in most states. **Montana** has translocated greater sage-grouse to augment populations in Alberta, Canada. **Idaho** has a new Rural Land Fire Protection Association program, with three rural fire protection associations created allowing private landowners and agency (local, state, and federal) fire management coordination to improve initial response on wildfires.

The **Washington** departments of Fish and Wildlife and Natural Resources are acquiring and conserving sagebrush habitat through the Natural Heritage and Wildlife Area programs. In **Utah**, more than \$8.8 million dollars was spent in 2013 on improving and enhancing sage-grouse habitat. The **Wyoming** Wildlife and Natural Resources Trust focuses on sage-grouse habitat enhancement and conservation easements. In addition, the Wyoming Department of Environmental Quality administers the process for industrial permits, working with developers to ensure the **Governor's Sage-Grouse Executive Order** is being implemented.

## Management Tools

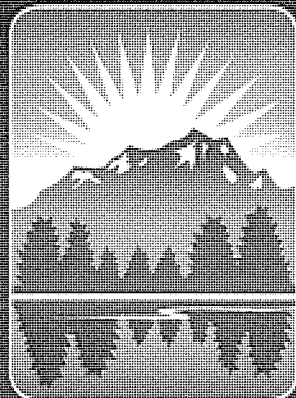
**Nevada** is making quick progress with the development of the Nevada Conservation Credit System (NCCS). In December, 2013, the Sagebrush Ecosystem Council and the interdisciplinary Sagebrush Ecosystem Technical Team began working with a contractor on the development of biological metrics for the NCCS as well as the framework for implementation. The NCCS is a key management tool for the state to achieve no net unmitigated loss of sage-grouse habitat. The system is being designed to utilize the Habitat Suitability Model that the state contracted with USGS for development. The scale of this mitigation system will be the first of its kind for greater sage-grouse mitigation and can serve as a model for other conservation efforts.

In addition, Nevada has contracted with the USGS to complete Habitat Suitability Modeling and Mapping for the greater sage-grouse. A preliminary draft of the map and suitability index was completed and will be reviewed by an expert review team in February of 2014 for refinement and final inclusion in the BLM/Forest Service EIS. The model incorporates greater sage-grouse telemetry data along with environmental data at multiple scales, such as land cover, vegetation communities, physiographic indices and anthropogenic attributes. The habitat suitability model will be used to inform management decisions on protecting the most critical habitat and to provide strategic decision tools to identify where conservation activities will have the greatest beneficial impact on the habitat.

In three **Colorado** counties (Delta, Gunnison and Montrose) a GIS "Habitat Prioritization Tool" is used to assess all land use applications for impacts to sage-grouse habitat.

## WESTERN GOVERNORS' ASSOCIATION

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westgov.org



The Western Governors' Association represents the Governors of 19 Western states and 3 U.S. flag islands. The association is an instrument of the Governors for bipartisan policy development, information exchange and collective action on issues of critical importance to the Western United States.

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WESTERN  
GOVERNORS'  
ASSOCIATION

Western Governors' Association  
Policy Resolution 2014-11

*Species of Concern and Candidate Species*

**A. BACKGROUND**

1. States possess broad trustee responsibilities, police powers and primacy over management of the majority of fish and wildlife within their borders, and state wildlife managers have on-the-ground expertise in managing species.
2. Western states are proactively engaged in species conservation, including development of state and/or multi-state conservation plans to manage species as an alternative to federal Endangered Species Act (ESA) regulation.
  - a. All 11 states with greater sage-grouse have developed state conservation plans or other authorities for conservation.
  - b. The five states with lesser prairie-chicken collaborated with the Western Association of Fish and Wildlife Agencies to develop the Lesser Prairie-Chicken Range-wide Conservation Plan. The Plan was endorsed by the U.S. Fish and Wildlife Service (FWS).
3. Western Governors applaud federal incentive-based conservation efforts such as the Sage-Grouse Initiative (SGI) and the Lesser Prairie-Chicken Initiative of the Natural Resources Conservation Service. These initiatives have successfully assisted landowners in conserving habitat for those species on a voluntary basis. ESA listings dramatically alter the ability of states and federal agencies to seek incentive-based, collaborative solutions to difficult conservation questions by causing citizens to avoid cooperative agreements.
4. ESA listing decisions have real economic impacts for state and local governments through restriction on rangeland grazing, hunting, tourism and development of resources on public and private lands. The negative economic impacts of federal ESA decisions fall solely on states, local communities, businesses, jobs, and private property owners.

**B. GOVERNORS' POLICY STATEMENT**

1. Western Governors support all reasonable management efforts to conserve species and preclude the need to list species under the ESA.

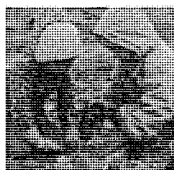
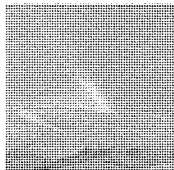
2. Western Governors believe that state and multi-state conservation plans, upon review, consultation and endorsement by the U.S. Fish and Wildlife Service or National Marine Fisheries Service (NMFS), should give rise to a regulatory presumption by federal agencies that an ESA listing is not warranted. To that end:
  - a. States need clear, concrete guidance from FWS and NMFS about the requirements of state and multi-state conservation plans in meeting minimum conservation goals and objectives that would lead to stable or increasing populations, eliminate perceived threats to the species, and eliminate the need for listing.
  - b. FWS and NMFS should acknowledge that variability in state approaches for conservation of species, particularly for species with a wide geographic range such as the greater sage-grouse, can be valid so long as conservation goals and objectives are met.
3. States should be included as partners in ESA listing determinations, particularly in the case of listings that could have significant impact on state economies. Partnership must include:
  - a. Cooperative engagement of federal agencies with state fish and wildlife agencies to ensure that state fish and wildlife data, analyses and management recommendations are used as a principal source to inform listing determinations.
  - b. Avoiding duplicate analysis by federal agencies of raw data previously prepared by the states.
  - c. Giving full consideration to state conservation plans as a means for species management and using such plans to the greatest extent practicable.
  - d. Private landowners are central to voluntary conservation efforts. Concerns about public release of data make private landowners reluctant to engage in these valuable voluntary conservation efforts. Efforts should be made to publicly release data at an appropriate scale which acknowledges and addresses such concerns.
4. In considering whether to list a species under the ESA, the FWS should give full recognition to voluntary conservation efforts conducted by landowners, states, non-profit organizations, and other stakeholders, whether independently conducted or in partnership with federal programs like the Sage Grouse Initiative (SGI).
5. When issuing a proposed rule for a candidate species, the FWS should define what thresholds of geographic, temporal or other conditions are necessary to preclude the need to list a species.

6. Conservation efforts by both federal and state governments should prioritize time and funding for primary challenges facing a particular species, rather than less-significant concerns or those easiest to mitigate.
7. Federal agencies, as partners, should do their share to conserve species and be consistent and coordinated in their efforts to conserve species.
  - a. Federal agencies need to demonstrate their commitment to species conservation by prioritizing such efforts on their own lands, in cooperation with the overarching goals of state conservation plans.
  - b. Adequate funding must be budgeted by the federal agencies for conservation efforts on federal lands.
  - c. The proportion of a species' habitat that occurs on federal land should inform the federal agencies' level of commitment to conservation of that species. States and local governments cannot bear a disproportional burden for species conservation when federal management practices are a dominating factor in the likelihood of a species' success.
8. Federal funding for state conservation of species including State and Tribal Wildlife Grants and Section 6 funds must remain robust. States rely on these grants to support and leverage state management of non-game species.
9. Governors support legislative initiatives, court rulings, petitions or regulatory measures which allow local, state, federal and private conservation efforts adequate time to be implemented and demonstrate their efficacy.

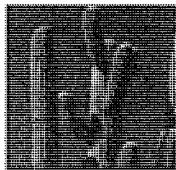
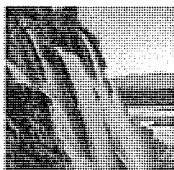
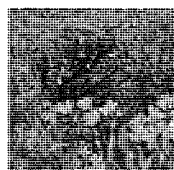
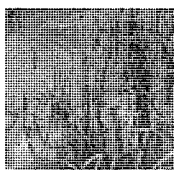
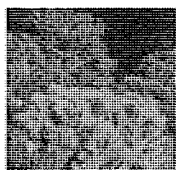
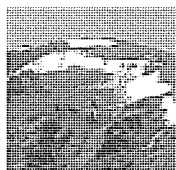
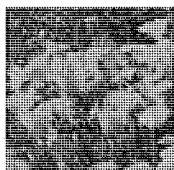
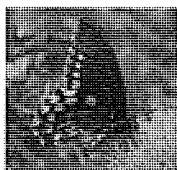
C. **GOVERNORS' MANAGEMENT DIRECTIVE**

1. The Governors direct the WGA staff, where appropriate, to work with Congressional committees of jurisdiction and the Executive Branch to achieve the objectives of this resolution including funding, subject to the appropriation process, based on a prioritization of needs.
2. Furthermore, the Governors direct WGA staff to develop, as appropriate and timely, detailed annual work plans to advance the policy positions and goals contained in this resolution. Those work plans shall be presented to, and approved by, Western Governors prior to implementation. WGA staff shall keep the Governors informed, on a regular basis, of their progress in implementing approved annual work plans.

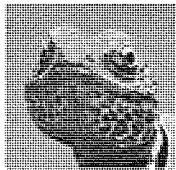
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# A Strategy for Improving the Mitigation Policies and Practices of The Department of the Interior



A Report to The Secretary of the Interior  
From The Energy and  
Climate Change Task Force



April 2014



# **A Strategy for Improving the Mitigation Policies and Practices of The Department of the Interior**

*A Report to The Secretary of the Interior  
From The Energy and Climate Change Task Force*

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**April 2014**

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The concept of mitigation, as expressly identified or implicit in the mission and statutory direction of the Department and its bureaus, is an essential element in how the Department manages the lands and resources under its jurisdiction. In response to Secretarial Order Number 3330 entitled “Improving Mitigation Policies and Practices of the Department of the Interior,” issued by Secretary of the Interior Sally Jewell in October 2013, this report highlights the challenges and opportunities associated with developing and implementing an effective mitigation policy, and describes the key principles and actions necessary to successfully shift from project-by-project management to consistent, landscape-scale, science-based management of the lands and resources for which the Department is responsible. In so doing, we believe that the natural and cultural assets stewarded by the Department can be managed more efficiently, effectively, and responsibly for the greater good of the nation.

To address the challenges associated with mitigation and improve practices while accommodating both infrastructure development and the conservation needs of America’s rapidly changing landscapes, the Department and its bureaus need mitigation policies and practices that a) more effectively avoid, minimize, and compensate for the impact of development on Department-managed lands and resources; b) provide better information and greater predictability to project proponents and land managers; c) improve the resilience of our Nation’s resources in the face of climate change; d) encourage more strategic conservation investments in lands and other resources; and e) increase compensatory mitigation effectiveness, durability, transparency and consistency.

Taking a landscape-scale approach to mitigation can meet these needs while improving permitting efficiencies, reducing conflict, and better achieving

development and conservation goals. In the mitigation context, the landscape approach dictates that it is not sufficient to look narrowly at impacts at the scale of the project; it is necessary to account for impacts to resource values throughout the relevant range of the resource that is being impacted. In order to realize the promise of landscape-scale mitigation, the Department and its bureaus will institute policies and procedures that reflect the following guiding principles:

1. **Landscape-scale:** *Incorporate landscape-scale approaches into all facets of development and conservation planning and mitigation.*
2. **Full Hierarchy:** *Utilize the full mitigation hierarchy in project planning and review.*
3. **Promote Certainty:** *Establish protocols to simplify planning and project review while improving operational certainty for project proponents.*
4. **Advance mitigation planning:** *At the outset of the project planning process, incorporate mitigation and landscape objectives into the design and development of projects that are likely to impact natural or cultural resources.*
5. **Science and Tools:** *Develop and utilize the scientific information and tools necessary to identify the most efficient and effective means of mitigating the effects of development and to inform monitoring and evaluation of mitigation efforts.*
6. **Foster Resilience:** *Identify and promote mitigation efforts that improve the resilience of our Nation’s resources in a rapidly changing climate.*
7. **Durability:** *Ensure that mitigation measures are durable.*
8. **Transparency:** *Promote transparency and consistency in the development of mitigation measures.*
9. **Collaboration:** *Coordinate with other federal and state agencies, tribes, and stakeholders in conducting assessments of existing and projected resource conditions, forming mitigation strategies, and developing compensatory mitigation programs.*
10. **Monitoring:** *Monitor and evaluate the results of mitigation over time to ensure that the intended outcomes are achieved.*

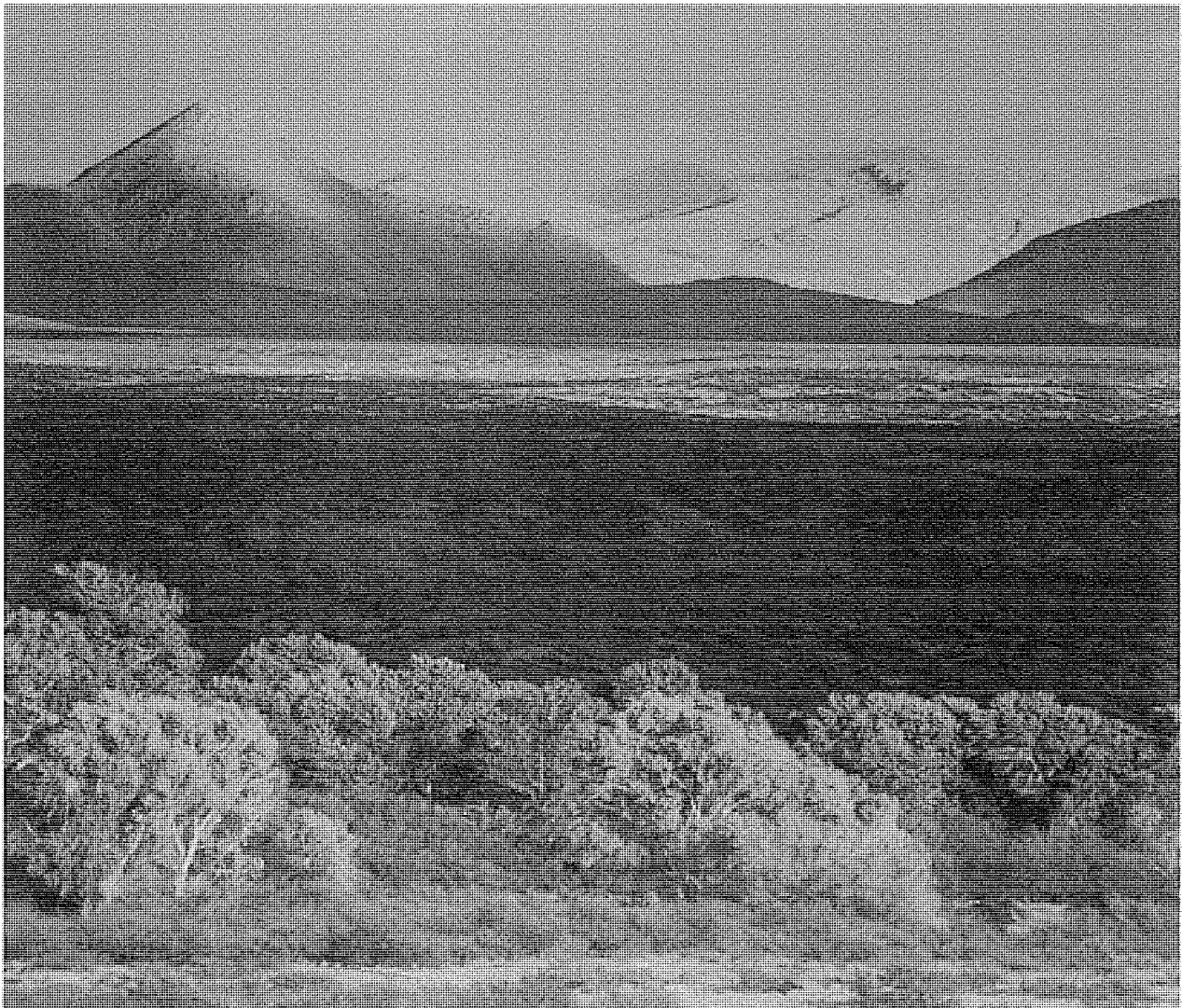
To effectively integrate these guiding principles and enhance the ability of state and federal agencies to address wildland fire, invasive species, climate change and other large-scale stressors, the Department’s management bureaus are moving toward a landscape approach to managing resources. The landscape approach to mitigation involves four distinct steps:

1. Identifying key landscape-scale attributes, and the conditions, trends, and baselines that characterize these attributes;

2. Developing landscape-scale goals and strategies;
3. Developing efficient and effective compensatory mitigation programs for impacts that cannot be avoided or minimized; and
4. Monitoring and evaluating progress and making adjustments, as necessary, to ensure that mitigation is effective despite changing conditions.

This report describes planned outcomes and next steps for each of these phases, as well as a number of near-term deliverables for the Department and its bureaus. Departmental bureaus are currently advancing this landscape approach to mitigation in various contexts, and anticipate that the strategy will evolve over time. This work is being conducted in collaboration with other federal, state, and tribal agencies, non-governmental organizations, and commercial interests.

This report describes an advanced form of collaborative problem-solving at a time when the uncertainties of a rapidly changing climate and the imperative of an energy transformation pose challenges for sustaining the natural ecosystems that buffer us from extreme weather events and play a fundamental role in the maintenance of America's clean air, clean water, agricultural productivity, world class recreational opportunities, and economy. This report, and the strategy it describes, is the Department's first step in building upon the innovative efforts that have been emerging across the Country to avert resource conflicts prior to development and to advance sustainable solutions that ensure the highest and best use of our natural resources.



On October 31, 2013, the Secretary of the Interior issued Secretarial Order Number 3330 entitled "Improving Mitigation Policies and Practices of the Department of the Interior." The Order charged the Department's Energy and Climate Change Task Force (Task Force) with developing a coordinated Department-wide strategy to strengthen mitigation practices:

*The purpose of this Order is to establish a Department-wide mitigation strategy that will ensure consistency and efficiency in the review and permitting of infrastructure development projects and in conserving our Nation's valuable natural and cultural resources. Central to this strategy will be (1) the use of a landscape-scale approach to identify and facilitate investment in key conservation priorities in a region; (2) early integration of mitigation considerations in project planning and design; (3) ensuring the durability of mitigation measures over time; (4) ensuring transparency and consistency in mitigation decisions; and (5) a focus on mitigation efforts that improve the resilience of our Nation's resources in the face of climate change.*

The Department has management responsibility over much of our Nation's federal lands, waters, and other natural resources. Steward for 20 percent of our Nation's lands, the Department oversees the development of over 20 percent of U.S. energy supplies, is the largest wholesaler and manager of water in the 17 western states, and provides services to over 500 federally recognized tribes and Alaska Native communities. In addition, the Department is responsible for the conservation and management of fish and wildlife resources, including over 800 native migratory bird species and nearly 2,000 federally listed threatened and endangered species. The Department also preserves and manages over 400 units of the National Park System and provides leadership for the National Historic Preservation Program, which guides the preservation of cultural resources both on and off the federal lands.

Given the inherent and sometimes difficult conflicts associated with the Department's responsibilities for both managing development and conserving the natural and cultural resources of the Nation's lands and waters, effective mitigation of the impacts of development is critical in enabling the Department, through its bureaus, to fulfill its statutory mandates. This report describes the rationale and the principles that will govern a Department-wide, landscape-scale approach to mitigation that fulfills the five purposes set forth in the Secretarial order and noted above. It also documents a number of actions that the Department and its bureaus will take in the coming months to further develop and implement the landscape-scale mitigation policy.

As directed in the Order, the Task Force report team conducted extensive outreach to many of our fellow federal agencies that conduct mitigation as well as several states and a subset of other stakeholders and partners (Appendix II). Due to the scope of mitigation efforts nationwide, this outreach effort will necessarily continue over the coming months as the Department works to implement an overarching mitigation framework consistent with the principles described in this report. To advance those efforts and provide the building blocks for its comprehensive new approach to mitigation, this report provides:

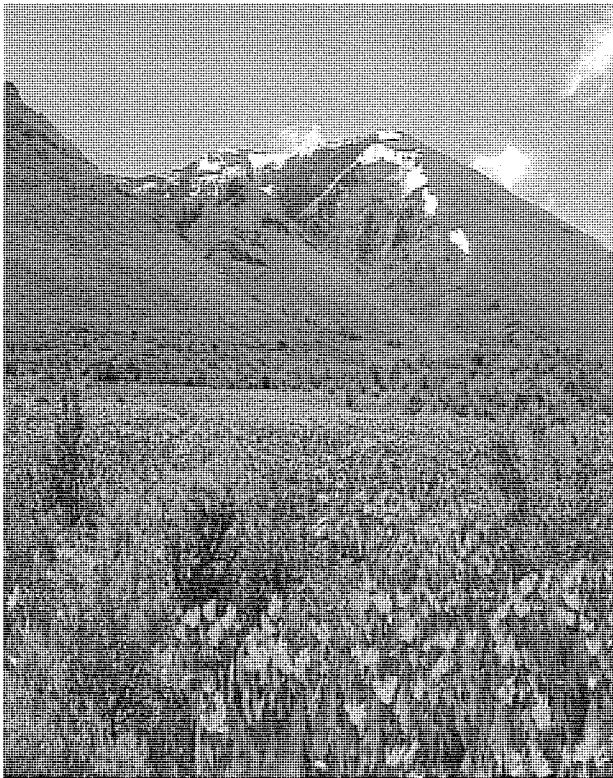
- a) A primer on the concept of mitigation and how it has been applied;
- b) A description of some of the key challenges that the Department and other agencies have faced in implementing effective mitigation;
- c) A Departmental strategy for overcoming those challenges, including a set of guiding principles that will govern the Department's landscape-scale mitigation efforts;
- d) Initial actions to be taken by the Department and its bureaus and agencies to implement a consistent and integrated landscape-scale mitigation policy;
- e) A list of deliverables and timelines for developing or revising landscape-scale mitigation policies and practices of the Department;
- f) A representative sample of some of the ongoing efforts that embrace the principles described in the strategy;
- g) A brief summary of the mitigation aspects of the Department's existing management practices and procedures, permitting, and legal authorities (Appendix I);
- h) A list of some of the agencies and partners contacted during outreach for this report (Appendix II).

The concept of mitigation, as expressly identified or implicit in the mission and statutory direction of the Department and its bureaus and agencies, is an essential element in how the Department manages the lands and resources under its jurisdiction. The purpose of this report is to highlight the challenges and opportunities associated with developing and implementing an effective mitigation policy and to describe the key principles and actions necessary to successfully shift from project-by-project management to consistent, landscape-scale, science-based management of the lands and resources for which the Department is responsible. In so doing, we believe that the natural and cultural assets stewarded by the Department can be managed more efficiently, effectively, and responsibly for the greater good of the nation.

## Origins

The Fish and Wildlife Coordination Act of 1934 included requirements that were the first formal expressions in law of a duty to minimize the negative environmental impacts of major development projects and to compensate for those impacts that remained – giving birth to the core ideas of what we now label as environmental mitigation. In the ensuing decades, environmental mitigation has come to play a key role in many other statutes and programs. Contemporary understanding of mitigation has benefited from decades of scientific advances and experience implementing the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the wetlands protection provisions of Section 404 of the Clean Water Act, the National Historic Preservation Act (NHPA) and other federal and state laws.

Under NEPA, federal agencies that are required to evaluate the environmental impacts of proposed federal actions may incorporate mitigation measures to reduce the impacts of the action. The Federal Land Policy and Management Act (FLPMA) requires that “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values.” The habitat conservation planning provisions of Section 10 of the ESA have proven sufficiently flexible



to provide the basis for either mitigation for the impacts of small, single-landowner development projects or broader regional conservation plans that offset the impacts of multiple projects undertaken by multiple landowners or project proponents. The Clean Water Act has spawned creative approaches to mitigation, including banking and in-lieu fee arrangements that seek to improve upon the outcomes of more typical, project-by-project mitigation efforts. The Clean Air Act has also encouraged innovative market-based approaches for reducing air emissions while also capturing cost savings.

Major energy and infrastructure development projects, both on land and offshore, can adversely affect a broad array of resources and values, including fish and wildlife, cultural resources, unique natural communities, scenic views, air quality, recreational opportunities, and water supplies for human use. For certain resources – including wetlands, endangered species, cultural resources, national parks, wildlife refuges, and wild and scenic rivers – there are explicit statutory and regulatory drivers requiring mitigation.<sup>12</sup> For other resources, mitigation decisions have been driven by the more broadly stated requirements of statutes such as NEPA and FLPMA.

## The Hierarchical Approach to Mitigation

As used in this report, the term “mitigation” encompasses the full suite of activities to avoid, minimize, and compensate for adverse impacts to particular resources or values. In the implementation of both NEPA and the Clean Water Act, there has developed a mitigation “hierarchy” or sequence of steps through which mitigation is typically achieved. The hierarchy starts with avoidance. If a project can reasonably be sited so as to have no negative impacts to resources of concern then that is generally the most defensible approach. By avoiding adverse impacts in the first place, there is no need to take further action to minimize or offset such impacts. If the authorization of the proposed action requires compliance with NEPA, NHPA, and/or ESA, determining whether or not adverse effects may occur is carried out through a public process for impact analysis and interagency consultation processes.

Frequently, however, it is not practical or possible to avoid negative impacts altogether. A linear project such as a road or pipeline may of necessity entail a number of stream or wetland crossings, for example. In such cases, the second step of the mitigation hierarchy seeks minimization of the associated impacts. For example, altering design features or integrating pollution control technologies could substantially minimize impacts to the immediate site, to human health and safety, and to nearby affected

resources in special status areas like national parks or wilderness areas. In the case of cultural resources, steps may be taken to minimize adverse effects by, for example, choosing paint colors or reducing the height of oil and gas tanks to reduce visual impacts. If the impacts cannot be adequately minimized, a project in a given location may not be appropriate and the permit denied.

Remaining steps in the mitigation hierarchy seek to repair, rehabilitate, or restore the affected environment or resource, and ultimately to compensate for, or offset, any impacts that remain. For example, compensating for unavoidable wetland impacts may include creating new wetlands where none previously existed, or restoring and protecting wetlands where they were damaged or destroyed. In still other cases, this type of mitigation might take the form of acquiring and bringing under long-term protection an existing, fully functional wetland. While the preservation of existing wetlands is an uncommon form of compensatory mitigation under the Clean Water Act, permanently preserving existing habitat is a common form of compensatory mitigation under the ESA.<sup>3</sup>

It should be noted that the term “mitigation” is sometimes used to refer only to the final step in the sequence described here. Thus, one sometimes sees the mitigation hierarchy somewhat confusingly described as “avoid, minimize, and mitigate.” For clarity, when referring to the final step in the hierarchy, this report will use the term “compensatory mitigation.” The term “mitigation” will refer to all of the steps in the hierarchy.

Although this hierarchical approach to mitigation includes a strong presumption in favor of the sequence described above, there are circumstances in which rigid adherence to the sequence may not realize the greatest overall benefit. There may, for example, be circumstances in which already-degraded habitat can be *avoided* or certain *minimization* measures are economically feasible, and yet other *compensatory* mitigation measures could achieve a better environmental outcome at less cost. In such situations, a rigid adherence to the mitigation hierarchy might not best serve the goals and purposes of the statutes that provided the basis for mitigation requirements. Similarly, some endangered species may occupy sites that are ephemeral in nature or facing major threats not subject to regulatory control. In such cases, greater conservation benefit may be secured by compensating elsewhere for the loss of such sites than by avoiding development in them.

### *Forms of Compensatory Mitigation*

Mitigation requirements – including compensatory mitigation requirements – are often imposed as a condition of a permit issued to a project sponsor by a regulatory agency. Traditionally, the permittee either

carries out the compensatory mitigation itself, or pays to have it done by another party (known as permittee-responsible mitigation).

Another mechanism for implementing compensatory mitigation is known as mitigation “banking.” This approach may be used where there might be economic efficiencies as well as better environmental results if compensatory mitigation actions are carried out in advance of foreseeable future projects, or if a single large mitigation action could compensate for the impacts of multiple future development projects. This approach allows for “banking” credits earned for early compensatory mitigation actions, and later drawing down against those banked credits as new development projects are undertaken. Wetland and stream banks have been developed under the CWA, and habitat conservation banks have been developed under the ESA. Mitigation banking is specifically provided for under the Clean Air Act with regard to emission controls and the siting of new facilities.

Two forms of mitigation banks are used. In one, credits from the bank are intended to be used to offset projects carried out by the bank creator. Other banks, however, earn credits that can be sold to third parties whose projects require compensatory mitigation. These multi-user banks are often called “entrepreneurial banks” because they are frequently established by for-profit businesses that seek to provide a specialized service (e.g., creation, restoration, or enhancement of wetlands) to others.

Yet another form of compensatory mitigation is referred to as “in-lieu fee” mitigation. This mechanism allows a project developer to satisfy its compensatory mitigation responsibilities by paying a fee to a third party (often a state agency or a conservation non-governmental organization, or NGO), with the assurance that the third party will use the fees to carry out future conservation actions. Some in-lieu fee arrangements initially received limited oversight, with fees sometimes accumulating for lengthy periods and ultimately being used for purposes that may not have offset authorized impacts. Under the Clean Water Act, however, recent regulatory revisions have addressed these shortcomings and reduced some of the distinctions between mitigation banks and in-lieu fee mitigation arrangements.

It is important to ensure that the mitigation measures required under different forms of compensatory mitigation actually offset the impacts of the authorized project – that is, ensure that the offsets are comparable to the impacts. There are multiple methods for establishing such comparability. For example, ratios are often used (for example, a 2:1 ratio requirement in which two acres of endangered species habitat

are restored or enhanced elsewhere for every acre of habitat lost) to ensure that the required mitigation offsets the project impacts, and to account for uncertainty, temporal losses, and other factors. In other cases, more sophisticated methods that focus on functional losses may be used.

### ***Science in Support of Mitigation***

The quality of mitigation decision-making depends, in large part, upon the quality of available information. Science informs mitigation decisions by providing: 1) a solid foundation for understanding the status, function, value, and drivers of change to natural resources within proposed development areas, 2) a basis for evaluating the tradeoffs associated with alternative mitigation strategies, 3) data and tools for measuring and understanding the short and long-term impacts of proposed projects, and 4) monitoring protocols to understand the effectiveness of mitigation actions relative to their design objectives. Throughout the process, quality science provides value-neutral data that

increases credibility and transparency, provides a factual basis for policy and agency decisions, and ultimately ensures that the mitigation design-process and resulting actions are supported by relevant knowledge. Science is particularly important for evaluating mitigation performance relative to predicted performance, thereby enabling adaptive management and the ongoing improvement of avoidance, minimization, and compensatory actions.

When underpinned by sound science, an array of tools can be used to significantly enhance and inform decision-making, provide a basis for the analysis of costs, benefits and trade-offs, and aid in understanding the long-term impacts of near-term decisions. These science-based tools include geospatial data integration, remote sensing, predictive modeling, habitat evaluation, scenario development, and forecasting and simulation, along with traditional tools like natural histories and condition assessments of species and communities.



In practice, the application of the mitigation hierarchy to manage the lands and resources under the Department's jurisdiction presents numerous challenges for land managers, project proponents, and other stakeholders. These challenges complicate not only the application of mitigation and other management tools, but also the ability to measure progress toward established mitigation goals. In this chapter we describe several of the major mitigation challenges, and in succeeding chapters we present a strategy for addressing them, including ways to enhance the effectiveness of the Department's overall mitigation policies and practices.

### 1. Resources at Risk:

#### **Increasing Pressure and Cumulative Impacts**

Not surprisingly, predictions suggest that pressures on natural and cultural resources will increase with population growth. "Our lands, air and waters are increasingly in demand for a wide diversity of uses including recreation, energy development – both renewable and conventional – and other forms of commerce. The *cumulative* impacts of these uses are having a significant effect on the landscape. The term cumulative impacts refers to the combined effects of human activity on a resource or community; impacts of an action may be relatively insignificant on their own, but as they accumulate over time and combine with the impacts from other sources they can lead to significant overall degradation of resources.

To date, analyzing and addressing these cumulative impacts has proven challenging. In the case of air quality, for example, a single oil and gas well or small group of wells generally cannot be identified as causing an exceedance of a specific threshold—be it a health based standard or a requirement to protect visibility in national parks. Tools exist, however, for analyzing cumulative impacts from multiple wells and determining whether mitigation is needed on individual operations to avoid exceedances.

### 2. Changing Climate: Increasing Uncertainty

Climate change has many known and potential impacts. Known impacts include increased temperature and evaporation, changes in precipitation patterns, extreme weather events, sea level rise and higher storm surge. These impacts can have significant effects on the natural and cultural resources managed by the Department, including changes in stream flow, increased wildfire risks, increased spread of invasive species, changes to wildlife health and behavior, and increased occurrence of flood

damage to historic properties. In addition to ecological impacts, climate change presents profound implications for social, cultural, and economic conditions. Science suggests that regions such as the Arctic are moving toward conditions never before witnessed.<sup>5</sup> The increasing uncertainty of near and long-term impacts of a changing climate requires decision-makers to manage toward less predictable future scenarios, and limits the effectiveness of current management tools that are based on more predictable variables, such as historical condition.

This increased uncertainty can have a significant effect on mitigation efforts that are designed to address impacts well into the future – impacts that cannot be easily predicted. New tools and approaches are necessary to allow managers to consider a range of plausible scenarios, make contingency plans, assess the resilience of the proposed mitigation strategies, provide for adaptive management, and ensure a precautionary approach in the face of uncertainty.

### 3. Science: Assessments, Baselines, Monitoring and Evaluation

The lack of adequate scientific information can be a constraint in the implementation of mitigation efforts. Scientific baselines that are necessary for understanding, monitoring and evaluating resources and their interactions are not always available. Without baseline information and an understanding of the complex interactions within and between natural systems, developing useful, quantifiable measures of mitigation success is extremely difficult. Effective and consistent monitoring of mitigation efforts at multiple scales is also needed to ensure that the measures are actually undertaken and that these measures are accomplishing their intended results. Fiscal resources should be allocated to ensure that monitoring and evaluation take place, particularly for system level impacts, multiple stressors, and/or the durability of the mitigation over the lifetime of the mitigation period.

When the science is inadequate, the promise of mitigation may not be realized, leading to potential ecological and compliance failures. In the case of salmon in the Pacific Northwest, for example, hatcheries were intended to compensate for the unavoidable loss of naturally spawning fish caused by dams. Unfortunately, however, it has turned out that artificial production of salmon has negatively impacted wild salmon stocks through competition for space and food, predation by

hatchery fish on wild stocks, introduction of disease and parasites, and a host of other factors.

To add to the challenges, effective mitigation requires many different types of scientific information and processes. Examples of scientific requirements for effective mitigation include monitoring conditions and processes in a comprehensive and consistent manner across jurisdictional boundaries; quantifying resources in both the impacted and mitigated areas; developing a system of metrics for adequately analyzing the comparability of development impacts and compensatory mitigation actions; assessing habitat quality for specific species of interest and assigning ecological equivalence to different locations; identifying tipping points that may lead to major degradation of natural and cultural resources and ecosystem services; developing models that accurately simulate environmental conditions in order to assess future possible scenarios; and providing useful data and training to land managers.

#### 4. Durability of Mitigation

The durability of mitigation efforts over time is another important area of concern. To be successful, compensatory mitigation measures must be effective at least as long as the impacts – specifically those impacts the measures are designed to offset. Easements, covenants, and title conveyance are all widely used mechanisms that can ensure against new actions that harm resources on private land. However, many mitigation areas also require ongoing management to prevent dumping, control invasive plants, respond to natural or human-caused disturbances, and address unexpected contingencies. Such management often requires significant financial resources.

Thus, a key challenge in ensuring the durability of mitigation efforts is ensuring the availability of needed resources over the long term. On federal lands, the challenge of ensuring durability of mitigation efforts has two added dimensions in that the laws applicable to such lands may restrict long-term encumbrances upon them and agency action is often dependent on yearly appropriations. Further complicating matters, current regulatory structures may restrict federal agencies from requiring compensatory mitigation beyond the life cycle of the project, which, even if the project site is later reclaimed, may not represent the full duration of the impacts.

#### 5. Additionality of Mitigation Measures

The goal of compensatory mitigation is typically to offset a proposed development action's expected impact on a resource value through conservation

measures that create, restore, enhance, or protect that same resource value in another location. For this goal to be achieved, it is essential that the offsetting conservation measures would not otherwise have occurred. If they would otherwise have occurred, then the impacts of development will not have been offset. In short, the beneficial effects of compensatory mitigation must be *additional* to what would otherwise have occurred.

When compensatory mitigation takes place on private land, it is usually not difficult to demonstrate additionality. When compensatory mitigation takes place on public lands, however, demonstrating additionality can be more problematic. The Fish and Wildlife Service, as a general matter, does not allow wetland restoration on National Wildlife Refuges to serve as compensatory mitigation for wetlands losses elsewhere, because the Service is already committed to restoring wetlands on its Refuges – wetland restoration efforts on Refuges would not be additional to what would otherwise happen there. For other land managing agencies with missions that encompass conservation, sorting out what would likely have occurred anyway from what will occur only because of compensatory mitigation initiatives is often very complex, entailing consideration of not only agency authorities, but possibly also agency budgets, plans, and historical practices.

#### 6. Issues of Scale

Project-by-project compensatory mitigation, particularly when guided by a rigid presumption that such mitigation should be located as near to the impact site as possible, can be inefficient and ineffective for many reasons. Most notably, the narrow focus of project-by-project development and associated mitigation foregoes the opportunity to consider and address broadly the full impacts of a project upon the functional values of the place that is impacted. By examining the conservation needs of a more expansive area, such as a watershed or landscape, it may be possible to determine how mitigation decisions could more effectively and efficiently compensate for the project's impacts. Limited by scale and scope, project-by-project mitigation is more likely to result in inefficient use of mitigation resources and can reduce overall environmental benefit.

Adding to the challenge of addressing impacts at larger scales, the lack of landscape-scale scientific information, and the tools to use it, can make it difficult to identify and prioritize mitigation opportunities at a greater scale. If available at the appropriate scale, such information could be



incorporated into decision support tools that would help policy makers and managers to better plan landscape-scale mitigation.

#### **7. Timeliness of Mitigation Considerations**

The timing of mitigation considerations can be a concern for permitting agencies, project proponents and the public. Project planning involves many steps, and mitigation requirements are often inconsistently addressed and take place late in the planning process. The failure to coordinate these considerations at an early stage in the permitting process can result in efforts that are unsatisfactory for the permitting agency, inefficient or costly for the project proponent, and/or ineffective as mitigation measures – an outcome frustrating for all partners and stakeholders. When a project proponent is required to provide costly compensation for impacts that may have been avoided if mitigation expectations were understood and addressed early in the planning process, for example, both the proponent and the resources being impacted suffer.

Discussions early in the process can facilitate the application of the mitigation hierarchy and help to avoid or minimize environmental impacts before more costly mitigation efforts are planned. Without these early discussions, project proponents can face uncertain requirements and costs, constraints that may compromise the success or sustainability of development efforts.<sup>6</sup>

#### **8. Consideration of the Full Mitigation Hierarchy**

Although mitigation includes avoidance, minimization, and compensation, the structures and procedures that have been developed to accommodate *compensatory* mitigation provide the clearest guidance thus far for project proponents and resource managers. Because of this and because few managers have the information and resources in place to consider issues and impacts across a landscape scale, reported mitigation activities tend to focus primarily on well-established compensatory mitigation approaches at a project site, and typically do so on a project-by-project basis. Although not all impacts can be avoided, there is currently no clear guidance on how to develop and apply avoidance criteria or how to measure and evaluate the degree to which avoidance was considered as an option. While mechanisms to encourage avoidance have been incorporated into some bureau planning and development functions in recent years (e.g., Western Solar Energy Plan and Master Leasing Plans), greater attention to avoidance early in the proposal process can help forestall considerable expense and/or conflict for the project proponent.

#### **9. Transparency and Efficiency**

Because compensatory mitigation at a landscape scale inherently involves making tradeoffs between resources, the transparency of mitigation decision-making is particularly important. Where clearly described and justified mitigation ratios or other criteria exist, are publicly available, and are consistently followed, transparency is seldom a concern. In the absence of such ratios or other criteria, however, mitigation decisions can appear to be ad hoc rather than principled, giving rise to the suspicion that those decisions are influenced by political or other inappropriate considerations. Coordination, consultation, and collaboration are essential to transparency. While some statutes, such as NHPA, require outreach and transparency, such measures are often not fully realized.

In addition to transparency, efficiency is an ongoing concern for project proponents concerned about the length of time it can take to acquire a permit. Studies are beginning to provide guidance for advancing more efficient, effective approaches to compensatory mitigation planning while ensuring opportunity for meaningful public input into such planning. For example, a recent analysis of Clean Water Act Section 404 permitting data shows that mitigation banks and in-lieu fee programs result in a shorter average time to permit than both on-site permittee-responsible mitigation and off-site permittee-responsible mitigation for wetland and stream mitigation. On average, mitigation banks took 107 days to permit and in-lieu fee programs took 123 days, while permittee-responsible mitigation took 189 days for on-site, and 222 days for off-site. Reduced permitting time can help decrease uncertainty for developers and increase mitigation efficiency.<sup>7</sup> The challenge is to reduce permitting times and uncertainty without sacrificing the opportunity for meaningful public input.

#### **10. Collaboration**

Although working at the landscape scale provides the best approach for addressing the challenges described above, it often requires the involvement of a number of partners – particularly for those efforts that cross jurisdictional boundaries and involve multiple government agencies. Effective coordination among federal, state, tribal, and local agencies, and private and NGO landowners and stakeholders can avoid duplication and lead to more effective mitigation efforts. In addition, certain situations may arise where appropriate large-scale mitigation efforts could benefit some agencies and adversely affect others. Mechanisms need to be developed both at the Departmental and interagency level to address these potential conflicts.



Finally, it should be noted that all of the above concerns exist even when the impacts to be mitigated involve only a single type of resource, such as an endangered species or a wetland. Mitigation becomes much more complicated when the goal is to address impacts to a variety of resources, including species, habitats, historic and cultural resources, water quantity and quality, air quality, scenic views, night skies, natural soundscapes and others. Conducting a comprehensive assessment and developing a mitigation plan for these different resources and associated ecological services at the landscape scale is a major challenge in light of current capabilities and the requirements of the various laws that apply. The fact that primary responsibility for these various resources may rest with several different state and federal agencies adds still more complexity. The coordination of mitigation decisions among several agencies must be a primary focus as the Department develops a landscape-level approach to mitigation.

### *Meeting the Challenge*

As a result of the many complexities and challenges described above, the application and effectiveness of the mitigation hierarchy to date has been uneven and difficult to evaluate. Rigid bureaucratic procedures are now straining to accommodate escalating expectations for federal lands at the same time that the resilience of those lands is increasingly compromised by rapid environmental change. Over a decade ago, the EPA

requested that the National Research Council (NRC) form a committee to evaluate the practice of compensatory mitigation for wetlands. In 2001, the NRC report found that compensatory mitigation projects “often are not undertaken or fail to meet permit conditions.” More recently, mitigation experts have noted, “[T]he way mitigation is currently applied does not capture cumulative impacts associated with development; it does not provide a structured decision-making framework to determine when projects can proceed or should be avoided; and it does not harness the full potential of offsets (conservation actions applied away from the development site).”<sup>9</sup>

To address these challenges and improve mitigation practices while accommodating both infrastructure development and the conservation needs of America’s rapidly changing landscapes, the Department and its bureaus need modern mitigation policies, procedures and practices that more effectively avoid, minimize, and compensate for the impact of development on the lands and resources under the Department’s jurisdiction; provide better information and greater predictability to project proponents and land managers; improve the resilience of our Nation’s resources in the face of climate change; encourage more strategic conservation investments in lands and other resources; and increase compensatory mitigation effectiveness, durability, transparency and consistency. The following chapters describe a strategy for developing such policies and procedures.

Mitigation is an essential part of the Department's efforts to implement its mission and those of its bureaus. The challenges described in the previous chapter present important considerations for improving Departmental mitigation policies and procedures. The strategy described in the following chapters addresses these challenges head-on in order to enhance the efficiency and effectiveness of mitigation practices at the Department.

This strategy advances ongoing efforts at the Department to embrace a landscape-scale approach to managing natural and cultural resources and improve the implementation of the mitigation hierarchy. The term "landscape-scale" can represent many different spatial scales depending on the resource values being managed. For the purposes of this report and related Departmental efforts, a "landscape" is defined as a large area encompassing an interacting mosaic of ecosystems and human systems that is characterized by a set of common management concerns. The landscape is not defined by the size of the area, but rather by the interacting elements that are meaningful to the management objectives.

In the mitigation context, the landscape approach dictates that it is not sufficient to look narrowly at impacts at the scale of the project; it is necessary to account for impacts to resource values throughout the relevant range

of the resource that is being impacted. While "landscape-scale" and "regional" are not synonymous, they indicate a similar consideration of interacting systems at a scale larger than the ecosystem, and should not be constrained by administrative boundaries.

As described below, a landscape-scale approach to mitigation – in contrast to project-by-project and single-resource mitigation approaches that focus on small spatial areas – can improve permitting efficiencies, reduce conflict, and better achieve development and conservation goals. Such an approach provides a broader palette of mitigation opportunities and improves the opportunity for mitigation success.

### *Guiding Principles for Landscape-Scale Mitigation*

In order to realize the promise of landscape-scale mitigation, the Department and its bureaus will institute policies and procedures that reflect the following guiding principles:

1. **Landscape-scale:** *Incorporate landscape-scale approaches into all facets of development and conservation planning, project review, and mitigation implementation.*

Consideration of the landscape-scale context provides the opportunity to see project development in the context of the larger landscape it will occupy and



associated resource values it will affect; enhances the ability to evaluate cumulative effects of multiple projects; expands the capacity to avoid, minimize, and offset project impacts; and allows managers to make avoidance and compensatory mitigation site selection decisions that optimize for multiple resource values.

Generally speaking, advancing landscape-scale mitigation involves assessing existing and projected landscape conditions; establishing management goals and strategies for the landscape; incorporating those goals and strategies into plans and actions; identifying landscape-scale issues, threats, and impacts; tailoring strategies to address those threats or impacts; and developing and implementing monitoring and evaluation protocols and metrics in an adaptive framework.

**2. Full Mitigation Hierarchy:** *Utilize the full mitigation hierarchy in project planning and review.*

Agency officials, project developers, and other stakeholders will use landscape-scale strategies and plans to more effectively design projects that avoid potential conflicts with natural, cultural, and other valued resources and minimize impacts to those resources. Bureau protocols and guidelines will be established to inform, monitor, and report on these avoidance and minimization efforts. For projects that have unavoidable impacts, compensatory actions will be designed to address those impacts by protecting or restoring resources of similar function and value within the context of the landscape strategy. Such compensatory actions will be characterized by the principles described in this chapter.

**3. Promote Certainty:** *Establish protocols to simplify planning and project review while improving operational certainty for project proponents.*

Implementing landscape-scale mitigation approaches can increase agency efficiency by reducing the time, costs, and complexities associated with project reviews, environmental analysis, and permitting. However, Departmental bureaus should seek to establish additional practices and procedures that will improve operational certainty and reduce costs. Some important practices, such as advance determination of mitigation needs, providing scientific information and tools for assessing baselines and trends, and instituting cross-agency collaboration, are described below, while others will be specific to the development sector or resource under consideration.

To enhance certainty for compensatory mitigation, policies and plans should clarify up front: (1) the types of actions that will qualify as compensatory mitigation; (2) the manner in which mitigation obligations will be quantified; and (3) the consequences of mitigation failure or unexpected developments. There is no single correct approach to dealing with unexpected future circumstances that render mitigation efforts less effective

than anticipated. However, transparent and consistent approaches and expectations will foster a more adaptive and effective response to these uncertainties and reduce surprises for project proponents.

To further improve certainty, bureaus should take steps to ensure that mitigation commitments are implemented consistent with the specific mitigation outcomes identified in each project decision or resource management plan. For mitigation actions to be undertaken by a particular bureau, the bureau should commit to seek necessary funding. If impacts to resource values and functions cannot be adequately mitigated, the bureau may deny the proposed land-use authorization or project approval. In order to advance a transparent and consistent approach to mitigation, the Department will clearly identify in decision documents the commitments to mitigation measures designed to achieve environmentally-preferable outcomes.

**4. Advance mitigation planning:** *At the outset of the project planning process, incorporate mitigation and landscape objectives into the design and development of projects that are likely to impact natural or cultural resources.*

Ensuring consideration of the mitigation hierarchy and landscape strategies up-front in the project planning process can dramatically increase operational certainty and advance management objectives. For resource developers, identifying mitigation needs early in the project development process can provide greater predictability and certainty in the design, development and implementation of projects by avoiding the need for late project revisions and analyses, and by providing for coordination and consistency among agencies. This can serve to reduce project costs and increase the confidence of investors, purchasers, and other project beneficiaries in the ultimate success of the project.

In order to determine the mitigation requirements of a proposed development at the beginning of the planning process, bureaus should clearly state the management objectives and legal requirements for the affected landscape. This ensures that the project developer understands any potential conflicts with these objectives and the mitigation requirements for a proposed project. Providing clear descriptions of these management objectives requires that landscape-scale strategies, informed by landscape-scale scientific information and tools, be developed and made accessible for all of the involved partners. Strategies should use the best available science and be inclusive of, and incorporated into, any existing plans that describe the agency's intended use and management of a particular landscape, such as Bureau of Land Management (BLM) resource management plans, Fish and Wildlife Service (FWS) threatened and endangered species recovery plans, and National Park Service (NPS) park unit plans.

- 5. Science and Tools:** *Develop and utilize the scientific information and tools necessary to identify the most efficient and effective means of mitigating the effects of development and to inform monitoring and evaluation of mitigation efforts.*

The concept of mitigation begins with a detailed understanding of the resources that are impacted by development, which resource values need to be protected, the current baseline status of these resources, and other projected threats such as the impacts associated with climate change, invasive species, or changing fire regimes. This baseline information is necessary in order to develop landscape-scale strategies, compare mitigation scenarios, and assess the effectiveness of mitigation actions over time. Scientific data and tools are therefore needed to gain an understanding of the condition of existing resources, to identify where these resources are found and best conserved across broad geographies, and to understand how the resources respond to the impacts of development.

Science at the landscape-scale is also necessary to place mitigation decision-making in the context of changing environments, influences, and impacts that are beyond the local or project scale. Geospatial tools, now capable of optimizing for more than one species or resource value at a time, should be used to identify priorities for avoidance and compensation for these multiple resource values.

- 6. Foster Resilience:** *Identify and promote mitigation efforts that improve the resilience of our nation's resources in a rapidly changing climate.*

Climate change impacts and trends are an important consideration for conservation and development goals; this is increasingly true if development impacts or conservation goals have long time horizons. The Department's climate change adaptation policy, issued in December 2012, requires the Department and its bureaus to "use the best available science to increase understanding of climate change impacts, inform decision making, and coordinate an appropriate response to impacts on land, water, wildlife, cultural and tribal resources, and other assets." It also established the Department's policy to promote landscape-scale, ecosystem-based management approaches to enhance the resilience and sustainability of linked human and natural systems and consider climate change when developing or revising management plans, setting priorities for scientific research and assessments, and making major investment decisions.

The policy promotes several practices essential to mitigation decision making, including protecting diversity of habitat, communities and species; protecting and restoring core, un-fragmented

habitat areas and the key habitat linkages among them; anticipating and preparing for shifting wildlife movement patterns; maintaining key ecosystem services; monitoring and preventing the spread of invasive species; focusing development activities in ecologically disturbed areas when possible, and avoiding ecologically sensitive landscapes, culturally sensitive areas, and crucial wildlife corridors. Landscape-scale mitigation provides opportunities to build resilience by considering the cumulative effects of development, incorporating conservation principles such as habitat connectivity into landscape strategies, and ensuring that conservation and development activities take place within a comprehensive regional strategy.

- 7. Durability:** *Ensure that mitigation measures are durable.*

Mitigation must be durable to be effective. Mitigation is only durable if it is effective for the duration of the development's impacts on the affected resource values and functions. Durability also requires that resources protected or restored must remain "un-impacted" by subsequent development and minimally vulnerable to other stressors (e.g., fire, invasive species) for the duration of the impacts of the proposed development. Ensuring such durability requires the use of multiple approaches, particularly on public lands. For example, BLM is exploring potential new approaches, including easements, cooperative agreements, conservation rights of way, and withdrawals, for ensuring effective and durable mitigation actions.

- 8. Transparency:** *Promote transparency and consistency in the development of mitigation measures.*

Ensuring the transparency and predictability of mitigation decision-making begins by clarifying what management objectives are to be met by these decisions. The objectives may depend upon the nature of the resource being affected by a particular project and by the legal authority protecting that resource. For example, some resources are inherently unique and irreplaceable, so the option of offsetting their loss by creating or restoring them elsewhere is not possible. For other resources for which offsets are possible, the goal of mitigation can be expressed as maintaining or expanding a resource, value, or function, or it could seek to offset unavoidable impacts "to the maximum extent practicable," or to achieve through compensatory mitigation a "net conservation benefit." Still other formulations are possible. Thus, Departmental mitigation policies should clearly state the resource values and functions for which mitigation is being implemented, the mitigation objectives in terms of specific, measurable performance standards; and expected results consistent with existing authorities, policies, guidance, and instruction memoranda.

To serve this transparency principle and ensure consistency in mitigation actions, the Department and its bureaus will ensure that mitigation measures are demonstrably additional and durable when compensating for unavoidable impacts, and always reflect the guiding principles described in this report, including the need to monitor the results of mitigation actions. When monitoring indicates that mitigation outcomes have not been met, additional corrective measures must be undertaken. Such measures should be provided for through assurances established as part of the compensatory mitigation agreement.

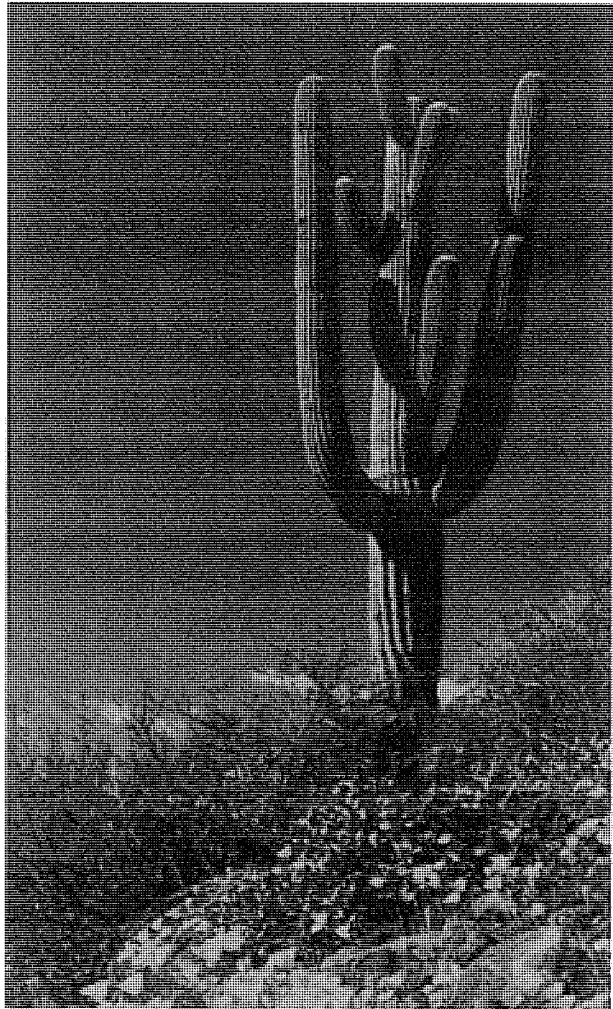
**9. Collaboration:** *Coordinate with other federal and state agencies, tribes, and stakeholders in conducting assessments of existing and projected resource conditions, forming mitigation strategies, and developing compensatory mitigation programs.*

For projects likely to impact multiple resources administered by different agencies, landscape-level mitigation can be used to bring these entities together early in the planning process to assemble the best available science and focus jointly on finding means to resolve any potential conflicts. In developing and implementing a landscape-scale approach to management, the Department will work with other federal and state agencies, tribes, scientific institutions, and stakeholders.

The networks of Landscape Conservation Cooperatives, Climate Science Centers, and other partnerships should be engaged to provide essential information in the development of landscape-level mitigation strategies across sectors, scales, and levels of government. For example, the Western Governors Association Wildlife Council's initiative on wildlife corridors and crucial habitats provides a regional data base that can support landscape-level project planning and mitigation. Tribes have off-reservation treaty and co-management rights that reflect long held traditions of cultural and spiritual site management and access concerns; the Department's special relationship with tribes requires special efforts to communicate and coordinate regarding these concerns.

**10. Monitoring:** *Monitor and evaluate the results of mitigation over time to ensure that the intended outcomes are achieved.*

Mitigation can fail to fully meet expected outcomes if the mitigation actions are not properly designed and implemented, if the actions prescribed are not the right ones to address a specific project impact, or if unanticipated changes in resource conditions (e.g., wildfire or drought) occur. To remain adaptive and effective, mitigation strategies and plans must be adjusted over time to respond to changing conditions or unanticipated or inadequate outcomes to ensure that such efforts successfully achieve their intended



purpose.<sup>10</sup> As part of the initial phases of project planning and in concert with project implementation, a monitoring strategy must be developed that permits accurate and transparent assessment of the current status of the resources of concern, how development has affected those resources, and progress in achieving the specific mitigation objectives for the resources and values impacted by the project.

Should monitoring reveal that mitigation objectives are not being achieved, or the outcomes of the mitigation are not producing the intended benefits, then changes in the mitigation strategy for current and future projects should be developed and adopted. A successful adaptive management process requires the establishment of management benchmarks to ensure progress toward mitigation goals, the establishment of protocols to monitor progress in relation to these benchmarks, and the resolve, fiscal resources, and ability to make adjustments as new information becomes available to ensure that mitigation objectives are ultimately achieved.

To effectively integrate the guiding principles described above and enhance the ability of state and federal agencies to address wildland fire, invasive species, climate change and other large-scale stressors, the Department's management bureaus are implementing a landscape approach that involves four distinct steps: 1) identifying key landscape-scale attributes, and the

conditions, trends, and baselines that characterize these attributes; 2) developing landscape-scale goals and strategies; 3) developing efficient and effective compensatory mitigation programs for impacts that cannot be avoided or minimized; and 4) monitoring and evaluating progress and making adjustments, as necessary, to ensure that mitigation is effective despite changing conditions (Figure 1).

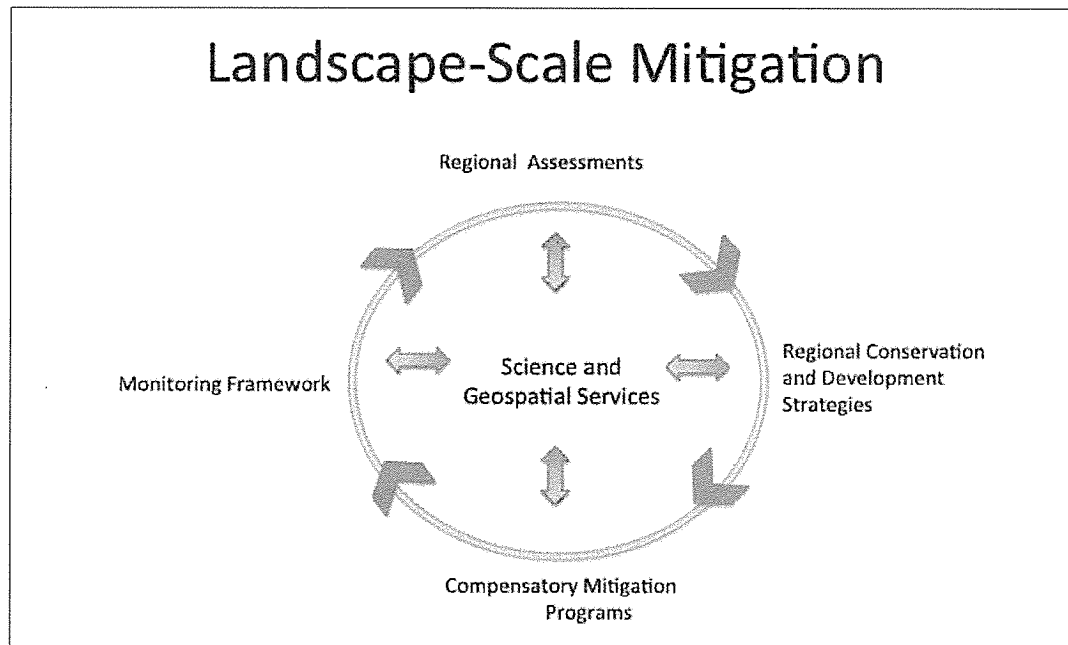


Figure 1. A Landscape Approach to Mitigation

Departmental bureaus are currently advancing a landscape approach to mitigation in various contexts in collaboration with multiple agencies and partners, and anticipate that these practices will evolve over time. To ensure consistent policies and practices and align the efforts of the bureaus to advance their respective missions, the bureaus will work together to advance a coherent landscape-scale strategy based on each of the four steps described above, and will do so in collaboration with other federal, state, and tribal agencies and non-governmental organizations, including industry. The outcomes for each of the steps are as follows:

1. **Geospatial Assessments:** Data and subject matter experts from the across the Department, collaborating with partners in other federal, state, and tribal agencies, will develop and maintain geospatial information systems for use in identifying existing and potential conservation priorities and development opportunities. These experts will develop tools and provide training to enable the appropriate scaling and use of these

geospatial data sources and maps. Much of this work has already been initiated; the United States Geological Survey (USGS) and other Departmental bureaus are developing science products and collaborating with state and non-governmental experts to help inform this landscape approach. These ongoing efforts include conducting research to help understand causal relationships and to identify potential thresholds, developing models to project future conditions, and providing remotely sensed imagery. Tools being developed by other federal agencies and several states will also inform this effort, including the Western Governors Association's Crucial Habitat Assessment Tool (CHAT) and State Wildlife Action Plans. *Outcomes:* a) A geospatial information system (or systems) that permits identification of existing and potential conservation priorities and development opportunities at the regional scale; and b) tools and the training necessary to promote their effective use in mitigation strategies. *Next Step:* Conduct a data and tools workshop and needs assessment, to be led by USGS in collaboration with other bureaus at the Department.

**2. Landscape-level Strategies:** Experts within the bureaus and offices of the Department will develop guidance for bureaus to employ in establishing landscape-scale goals and strategies. These goals and strategies will guide future resource planning and management decisions to advance a landscape level approach. This process will utilize the geospatial tools and data described above to help guide application of the mitigation hierarchy. Existing and planned policies will inform this effort, including the BLM Master Leasing Plans, BLM's interim Regional Mitigation Policy, the Dry Lake Solar Energy Zone Regional Pilot Mitigation Strategy, and subsequent regional mitigation strategies. Ongoing efforts to mitigate for impacts to the greater sage-grouse will also inform this work. Strategies will be utilized in agency planning efforts, such as BLM's Resource Management Plans (when each plan is updated), and used to enhance project-specific NEPA processes. *Outcome:* Guidance for developing landscape-scale strategies that ensure the effective implementation of the mitigation hierarchy in planning major development activities, including energy and infrastructure, minerals, and water resources development. *Next Step:* Undertake a multi-bureau survey of existing and planned guidance related to mitigation strategies, to be led by BLM in collaboration with other bureaus at the Department.

**3. Compensatory Mitigation Programs:** Experts within the bureaus and offices of the Department will develop a template to inform future compensatory mitigation efforts. The purpose of this template will be to ensure that compensatory mitigation programs advance landscape-scale mitigation strategies; provide appropriate means for addressing the unavoidable impacts to resources associated with development; frame the management of compensatory mitigation funds; set standards for the certification of regional mitigation and/or conservation banks, and provide for periodic reporting on the effectiveness of completed mitigation actions. This work will build upon existing efforts across Departmental bureaus, other federal agencies, and states, and will incorporate best practices from ongoing programs, including compensatory mitigation programs for impacts to streams, wetlands, and endangered species. *Outcome:* A template for developing compensatory mitigation programs that achieve landscape level strategic goals and incorporate the guiding principles described in this report. *Next Step:* Prepare a multi-state comparison of existing compensatory mitigation programs and practices, led by FWS.

**4. Monitoring and Evaluation:** In consultation with their counterparts in federal, state, and tribal agencies, experts within the bureaus and offices

of the Department will develop a framework for monitoring and evaluating the effectiveness of specific mitigation actions or strategies. Utilizing the geospatial systems and data sources described above, this framework will build upon existing and evolving monitoring protocols and be integrated at a landscape scale. The framework will be used for projects, mitigation actions, and regional mitigation strategies or plans and will include the establishment of metrics and benchmarks that will help inform the application of the mitigation hierarchy over time, including periodic reviews of specific mitigation strategies. This framework will ultimately inform adaptive management strategies for achieving landscape-level management goals. *Outcome:* A monitoring and evaluation framework to measure the effectiveness of mitigation projects and actions, to measure progress toward the goals established by the landscape-level strategies, and to direct adjustments to these strategies when necessary to correct mitigation failures and adapt to changing conditions. *Next step:* Conduct a multi-agency review of existing landscape-scale programs for monitoring change in terrestrial condition, aquatic condition, and landscape pattern, to be led by Departmental bureaus working with the Interagency Land Management Adaptation Group.

### Near-Term Policy Deliverables

The above outcomes will provide the foundation for developing a meaningful landscape-scale approach in the face of increasing pressures and accelerating change across American landscapes. In order to facilitate the four outcomes described above, incorporate the guiding principles into practice, and ensure the implementation and reporting that will be required, the Department will complete the following policy and process deliverables while examining additional measures that would advance the landscape-scale mitigation strategy:

1. **Department Manual Mitigation Chapter** – Q3 2014. The Office of Policy Analysis will develop guidance, in the form of a new chapter to the Department Manual, for implementing, Department-wide, the principles and procedures outlined in this strategy.
2. **Interagency Coordination** – The Department will work with the Steering Committee on Infrastructure Permitting and related working groups to execute the Implementation Plan for the Presidential Memorandum on Modernizing Infrastructure Permitting, including its provision to "Expand Innovative Mitigation Approaches."
3. **Develop Mitigation Framework for Greater Sage-Grouse Conservation** – Complete Q4 2014. The Department, with leadership from the BLM, USGS, and the FWS, will develop a landscape-scale mitigation framework for greater sage-



- grouse conservation in collaboration with states, tribes, and local governments, as well as industry and other stakeholders.
4. **Initiate Guidance for Mitigation in National Environmental Policy Act Analysis – Q3 2014.** The Office of Environmental Policy and Compliance will convene a working group of Department NEPA specialists to develop Departmental guidance based on the Council on Environmental Quality's 2011 guidance on the "Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact." This guidance will reflect CEQ guidance on integrating compliance with NEPA and section 106 of NHPA.
  5. **Develop Geospatial Data Tools for Landscape-scale mitigation – Q4 2014.** The Department, with leadership from the Geospatial Information Officer and the USGS, will convene a workshop of partners and experts to identify and evaluate existing landscape analysis data and tools and issue guidance for their use in mitigation decision support as described in section 4.2 above.
  6. **Develop Technical Reference for Solar Energy Zone Regional Mitigation.** The BLM will conduct a stakeholder workshop to discuss the lessons learned from the Dry Lake SEZ Regional Mitigation Pilot Strategy and develop a technical reference document for developing future regional mitigation strategies for solar development. Lessons learned from the Dry Lake pilot effort, as well as public feedback on the strategy, will inform the development of mitigation strategies for additional SEZs.
  7. **Finalize BLM Regional Mitigation Policy – Q3 2014** The BLM will finalize its "Interim Draft Regional Mitigation Manual Section 1794" in accordance with this strategy. This policy will include a commitment to avoid, minimize, and compensate for residual impacts to appropriate resources, including conservation areas within and outside the jurisdiction of the bureau in collaboration with relevant land managers such as NPS, FWS, USFS, and state resource management agencies.
  8. **Initiate Development of Handbook for Implementing Regional Mitigation Policy – Q1 2015.** The BLM will initiate development of a handbook for implementing its Regional Mitigation Policy and will work to incorporate mitigation principles into relevant programmatic handbooks and manuals. The BLM will also develop training modules for field staff.
  9. **Develop and Implement Regional Workshops and Training for Implementation of Landscape-Level Mitigation – Q1 2015 and ongoing.** An interagency team will conduct regional workshops on implementation of the policies, programs, and guidance for landscape-level mitigation described in this strategy. Training and resources will address lessons learned and best management practices, and may include non-agency stakeholders. USGS, in collaboration with other bureaus within the Department, will provide training, technical assistance, and tool development for incorporating best available science, design of monitoring frameworks, adaptive management, and use of Structured Decision Making for evaluating mitigation alternatives.
  10. **Policy Forum on Landscape-Scale Analysis – Q4 2014.** In conjunction with other bureaus within the Department and the U.S. Forest Service, the BLM will convene a policy forum of federal scientists and policy experts, working with state authorities and other key stakeholders, to share methods for identifying potential landscape-scale conservation and development priorities and to discuss how those methods may be better integrated into BLM Resource Management Plans and U.S. Forest Service Forest Plans.
  11. **Propose Revisions to FWS Mitigation Policy – Q4 2014.** The FWS will formally propose revisions to its 1981 Mitigation Policy consistent with the principles outlined in this strategy.
  12. **Propose Revisions to FWS Mitigation Banking Policy – Q4 2014.** The FWS will formally propose revisions to its 2003 "Guidance for the Establishment, Use, and Operation of Conservation Banks" consistent with the principles outlined in this strategy.
  13. **Propose FWS Policy on Mitigation for Candidate Species – Q2 2014.** The FWS will formally propose new policy regarding mitigation for established "candidate species" that ensures the validity of those commitments should the species be listed under the ESA.
  14. **Initiate Guidance for Landscape Scale Mitigation Under Section 106 of NHPA – Q1 2015.** The NPS will convene a workgroup of experts from DOI land managing bureaus, the Advisory Council on Historic Preservation, and other stakeholders to develop guidance for landscape-scale mitigation of impacts to cultural resources under Section 106 of the NHPA.
  15. **Initiate Guidance for Landscape Level Mitigation for Shared Scenic Resources and Values – Q1 2015.** The NPS will convene a workgroup of experts from Departmental land managing bureaus and other stakeholders to collaboratively develop guidance for addressing landscape-level mitigation for preserving shared scenic views.

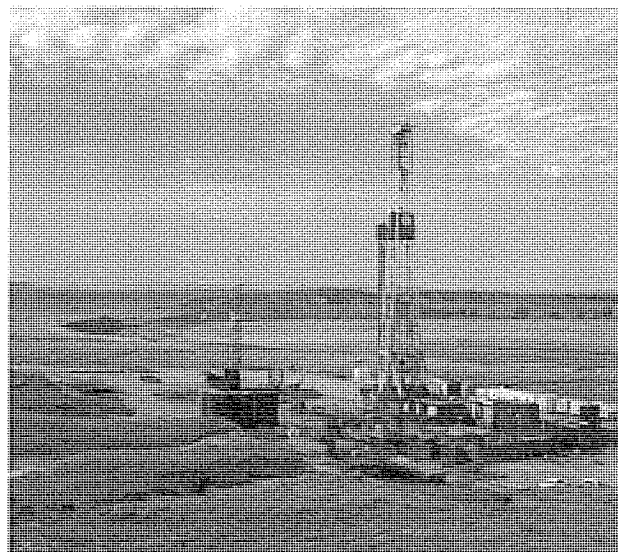
The preceding strategy provides a blueprint for improving the effectiveness of the Department's mitigation policies and practices. In developing this proposed strategy, the authors reviewed many efforts, tools, and initiatives already ongoing or planned at the state and federal level that will inform the implementation of these reforms. The following sampling of efforts provides both proof-of-concept and a hopeful sign that many of the principles described above are already embedded in initiatives at all levels of government. Our challenge now is to build from these endeavors to construct a consistent and effective set of policies for the Department of the Interior and nationwide.

- **The Maryland Water Resources Registry (WRR)** is a collaborative effort by multiple federal and state agencies to streamline permitting processes while simultaneously enhancing ecological outcomes. The stated objective of the WRR is to "map natural resource areas that are a priority for preservation" and to "identify sites best-suited for ecosystem preservation and restoration". The WRR interagency team worked in partnership to 1) Integrate agency conservation priorities associated with the Clean Water Act; 2) Develop criteria for prioritizing areas suitable for conservation and restoration; and 3) Publish a web site where mitigation "opportunities" can be explored via a Geographic Information System. Published mitigation opportunities include the protection or restoration of wetlands, uplands, streamside areas, and storm water infrastructure areas. The interactive-mapping tool uses a scoring system to rate mitigation opportunities with the goal of attracting developers towards mitigation opportunities with the highest ecological value. The benefits of the WRR include the following:
  - *Permit applicants can easily identify priority mitigation opportunities during the planning phase, before the review process is initiated.*
  - *Private developers can guide their land use and mitigation decisions based on multi-agency priorities.*
  - *Public land trusts and wetland bankers can target areas for purchase and preservation.*
  - *Local and County planners can inform resource protection, zoning, and land use plans. Registry Web site: <http://www.watershedresourcesregistry.com>.*
- **Advance Permitting for Bridge Modernization in Oregon.** In 2003 the Oregon State Legislature enacted the third Oregon Transportation Investment Act (OTIA III), an infrastructure and economic stimulus law that established a State Bridge Delivery Program requiring advance permitting and environmental mitigation planning prior to design and build. In 2008

the Oregon Department of Transportation conducted a cost/benefit comparison of a traditional project permitting approach with the programmatic process developed for the OTIA III State Bridge Delivery Program. The analysis noted that "the expected need for mitigation as a result of bridge construction has been a fraction of what was anticipated at the beginning of the program due to the avoidance of resources during the development process..." While \$54 million in savings was projected, the realized savings exceeded \$73 million in 2008.

In addition to cost avoidance and a substantial reduction in delays, the qualitative benefits of the programmatic approach versus the project-by-project approach were also described in the analysis as substantial, including increased trust and improved flexibility in resolving issues. "The economies of scale realized by addressing regulatory obligations at a program level have taken negotiations on mitigation and enhancement opportunities off of the critical path for individual projects. This has led to decreased construction schedules and better environmental outcomes."<sup>11</sup>

- **North Carolina Ecosystem Enhancement Program.** North Carolina's Ecosystem Enhancement Program (EEP), a State-backed in-lieu fee program that provides offsite compensatory wetland and stream mitigation offsets, has allowed the state's Department of Transportation (NCDOT) to integrate their transportation planning with landscape-level watershed planning in order to streamline the overall mitigation process. In doing so, the EEP has reduced wetland mitigation expenses, as a percent of NCDOT project costs, from 8 percent to less than 3 percent, representing an annual cost savings of \$32.5 to \$65.0 million.<sup>12</sup> The North Carolina Department of



Environment and Natural Resources reports that, since 2003, the EEP has allowed the NCDOT to advance nearly \$14 billion in transportation projects without a single delay due to mitigation permitting (from: <http://portal.ncdenr.org/web/eeep/why-eeep-matters>).

- **The Western Governors' Crucial Habitat Assessment Tool (CHAT).** The CHAT is a cooperative effort of 16 Western states to provide the public and industry a high-level overview of "crucial habitat" across the West. As defined by the Western Governors Association (WGA), crucial habitats are areas that are "likely to provide the natural resources important to aquatic and terrestrial wildlife, including species of concern, as well as hunting and fishing species." The CHAT, built from state wildlife agency data, is intended to help project proponents during pre-planning of development or in comparing wildlife habitat areas. The tool is designed to help developers reduce costs, conflicts and surprises while ensuring wildlife values are better incorporated into land use decision-making. The online tool is an example of WGA's collaboration with federal agencies – including the FWS, the BLM, and the U.S. Forest Service – to enable state fish and wildlife data and analyses to inform land use, planning and other land use decisions. "The Western Governors encourage widespread use of CHATs to better inform energy, transportation, and land use planning while providing for healthy and productive landscapes." (from: [http://www.westgov.org/policies/cat\\_view/95-reports/280-2013?orderby=dmdatecounter&ascdesc=DESC](http://www.westgov.org/policies/cat_view/95-reports/280-2013?orderby=dmdatecounter&ascdesc=DESC)).
- **Dry Lake Solar Energy Zone.** In conjunction with the Western Solar Energy Plan, the BLM developed a pilot mitigation strategy for solar energy projects that may occur in the Dry Lake Solar Energy Zone. The Solar Energy Plan calls for the development of mitigation strategies for each solar energy zone (SEZ) to identify opportunities for compensatory mitigation to offset the impacts of projects on resource values in the SEZ. Through the development of these mitigation strategies, project proponents will have a better understanding of the mitigation measures required, and the associated costs, for compensatory mitigation actions in conjunction with development in the particular SEZ. Lessons learned from the Solar Regional Mitigation Strategy for the Dry Lake Solar Energy Zone will be used to inform the development of future mitigation strategies for other solar energy zones.
- **Multi-State Habitat Conservation Plans.** Habitat conservation plans (HCPs) under the Endangered Species Act have been used both to offset the impacts of single-landowner development projects

and to integrate endangered species conservation considerations into local land-use ordinances. Increasingly, habitat conservation plans are being used to address activities occurring in multiple states. A recent example is the plan approved for NiSource, Inc., a natural gas pipeline and distribution company. This HCP mitigates the impacts of pipeline construction and maintenance activities on dozens of endangered species in fourteen states. Similar multi-state HCPs are under development for wind energy projects within the migratory corridor of the whooping crane and within the range of the endangered Indiana bat.

- **Desert Renewable Energy Conservation Plan.** The Desert Renewable Energy Conservation Plan (DRECP) is a comprehensive and coordinated state/federal effort to provide effective protection and conservation of California's desert ecosystems while guiding the development of appropriate renewable energy projects throughout the region (over 22,585,000 acres).

Goals and objectives for the DRECP: Provide for the long-term conservation and management of Covered Species\*; preserve, restore, and enhance natural communities and ecosystems; identify and avoid impacts to sensitive cultural resources; build on the Competitive Renewable Energy Zones identified by previous studies; further identify the most appropriate locations for utility-scale renewable energy projects; provide a framework for a more efficient process for regulatory authorization resulting in greater conservation than project-by-project or species-by-species reviews can obtain; provide durable and reliable regulatory assurances; identify and incorporate climate change adaptation research, management objectives, and/or policies into the final plan document.

- **Advance Mitigation for Greater Sage-Grouse and Lesser Prairie-Chicken**

#### *Greater Sage-Grouse*

In conjunction with the development of a conservation strategy for the greater sage-grouse, federal and state land management agencies are developing guidance for measures to mitigate the effects of development activities that may pose a threat to the continued existence of the species. This strategy will apply to all management actions on BLM, Forest Service, and state lands within the remaining range of the species while providing each state the flexibility to develop tools (e.g., mitigation banks, fee structures) to meet the desired mitigation outcomes.

\* Proposed Covered Species are plants and animals identified in the Plan for which conservation and management are provided and "take" will be authorized over a long-term permit period. The Covered Species list is developed through an iterative planning process incorporating input from the public stakeholders, and independent scientific review.

### *Lesser Prairie-Chicken*

The five states with lesser prairie-chickens (CO, KS, NM, OK, and TX) have developed a rangewide conservation plan that relies heavily on a mitigation program in which agricultural landowners will be paid to undertake conservation measures on their lands. Funds for these payments will come from assessments on oil and gas and other development activities. Under the special 4(d) rule proposed by the FWS, development activities that result in the taking of lesser prairie-chickens will be authorized, provided that those development activities are covered by the mitigation program. Thus, even though the lesser prairie-chicken is a federally listed threatened species, the state-developed rangewide conservation plan and its mitigation program will effectively leave the states with the authority to continue to manage and conserve the species.

- **Offshore Wind Energy.** In 2010, the Department's Bureau of Ocean Energy Management (BOEM) launched an offshore 'Smart from the Start' program designed to facilitate efficient and environmentally responsible siting, leasing and construction of new offshore wind energy projects on the Atlantic Outer Continental Shelf (OCS). The Initiative calls for BOEM, in close coordination with local, state and Federal partners, to identify priority wind energy areas for potential development and accelerate the leasing process for those areas. BOEM has convened 10 intergovernmental state Task Forces engaged in planning for Atlantic OCS wind leasing and development, and has also launched Task Forces in Oregon and Hawaii. The Task Forces are central to planning and designing wind energy areas that provide opportunities for significant wind energy generation while minimizing and managing potential conflicts with environmental concerns and important other uses, such as fishing, shipping, tourism, National Seashores, and Native American and cultural interests.

BOEM uses the best available science and a stakeholder-driven process to identify resources, conflict-use areas and suitable placement of offshore energy facilities. Through the Task Forces and the environmental review process, BOEM will identify necessary mitigation needs for potential environmental risks early in the process. Mitigation may include avoiding archaeological resources, reduced vessel traffic, avoiding high value fishing grounds, requiring minimum separation distances for marine mammals, preserving important ocean views, or adjusting the locations of meteorological towers and buoys to avoid adverse effects to offshore cultural resources or biologically sensitive habitats.

- **Rapid Ecoregional Assessments.** The BLM's Rapid Ecoregional Assessments (REA) Program was initiated in 2010. REAs are peer-reviewed science products that synthesize existing information (including a significant

amount of non-BLM data) about resource conditions and trends. They highlight and map areas of high ecological value; gauge potential risks from stressors including climate change; and establish landscape-scale baseline ecological data to gauge the effect and effectiveness of future management actions. It is the policy of the BLM to use this REA information and similar information from other large-scale assessments to help identify potential development and conservation priorities; prepare land use plans and plan amendments; conduct cumulative impact analyses; develop best management practices; and authorize public land uses. Like the Western Governors Association's Crucial Habitat Assessment Tool, the REAs are foundational to a landscape approach to management. The BLM released four Rapid Ecoregional Assessments (REAs) in 2013 and is planning to release four additional REAs in 2014, six in 2015, and one in 2016. Taken together, these 15 REAs cover over 700 million acres of public and non-public lands.

- **Transportation Infrastructure.** With the understanding that existing mitigation efforts do not always provide the greatest environmental benefits or promote ecosystem sustainability, the U.S. Department of Transportation and a team of representatives from eight other federal agencies and Departments of Transportation from four states developed guidance for making transportation infrastructure development more sensitive to wildlife and ecosystems through enhanced interagency and stakeholder collaboration. This effort culminated in the 2006 report *Eco-Logical: An Ecosystem Approach to Developing Infrastructure Projects*. In 2012, the State of California adopted a draft framework for Regional Advanced Mitigation Planning (RAMP) that embraced the principles from *Eco-Logical* but also established guidelines for streamlining permitting processes as well as improving conservation outcomes – essentially integrating infrastructure and conservation planning. This approach has been endorsed by the California Departments of Transportation, Water Resources, and Fish and Game, as well as the California Wildlife Conservation Board, the California State Water Resources Board, the U.S. EPA, National Marine Fisheries Service, and the U.S. Department of Transportation.

The initiatives and programs described above are only a few of the many programs now being developed at state and federal levels to address the need to better integrate development and conservation planning at the landscape scale on both public and private lands and waters. To varying degrees they all address the guiding principles from Chapter 4 and seek to improve mitigation efficiencies and effectiveness, provide more transparency and predictability, and foster more resilient human and natural systems in the face of a changing climate.

This report describes an advanced form of collaborative problem-solving at a time when the uncertainties of a rapidly changing climate and the imperative of an energy transformation pose challenges for sustaining the natural ecosystems that buffer us from extreme weather events and play a fundamental role in the maintenance of America's clean air, clean water, agricultural productivity, world class recreational opportunities, and economy.

The list of promising efforts described in the previous chapter demonstrates that there is a widely shared understanding of the need to work collaboratively to advance landscape-scale approaches. It also demonstrates that there are as many variations on the approach as there are management needs. To advance the multiple missions of the Department and its bureaus, these approaches must be aligned as much as possible across bureaus, agencies, states, and partners.

The strategy described in this report is intended to establish a common approach that will evolve and adapt to changing needs but ensure consistent policies and practices Department-wide. Getting it right on mitigation will improve our Nation's ability to more effectively balance the Department's responsibilities for managing development and conserving America's incomparable natural and cultural resources. This report, and the strategy it describes, is the Department's first step in building upon the innovative efforts that have been emerging across the country to avert resource conflicts prior to development and to advance sustainable solutions that ensure the highest and best use of our natural resources.



## References

- <sup>1</sup> Under NHPA, federal agencies are required to consider the effects of their “undertakings” on historic properties; regulations require that the federal agency consult States, Tribes, and the public to identify historic properties, assess, and resolve adverse effects (if any).
- <sup>2</sup> The Wild and Scenic Rivers Act requires the avoidance of adverse impacts to river values.
- <sup>3</sup> Compensatory mitigation is not a concept explicitly expressed under the NHPA, but in practice it does sometimes occur. For example, an activity that adversely affects some properties in a historic district might be mitigated through creation of a dedicated funding source to care for the remaining properties. In general, however, due the uniqueness of cultural and historic resources, avoidance and minimization are usually essential to the successful conservation of these resources. Similarly, avoidance of impacts to parks, wilderness areas, and conservation system lands from nearby development will best ensure the integrity of these areas and avoid the need for compensatory mitigation of uncertain efficacy.
- <sup>4</sup> World Bank. 2007. *Global economic prospects 2007: Managing the next wave of globalization*. Washington, DC: World Bank.
- <sup>5</sup> Clement, J.P., J.L. Bengtson, and B.P. Kelly. 2013. *Managing for the Future in a Rapidly Changing Arctic. A Report to the President. Interagency Working Group on Coordination of Domestic Energy Development and Permitting in Alaska* (D.J. Hayes, Chair), Washington, D.C.
- <sup>6</sup> David J. Hayes, “Addressing the Environmental Impacts of Large Infrastructure Projects: Making ‘Mitigation’ Matter,” 44 *Environmental Law Reporter* 10016 (Jan. 2014).
- <sup>7</sup> Birnie, Katherine (Ecosystem Investment Partners). May 9, 2013. “State of the Market: National Market Analysis and Overview.” Presentation at 2013 National Mitigation & Ecosystem Banking Conference. New Orleans, LA.
- <sup>8</sup> National Research Council. 2001. *Compensating for Wetland Losses under the Clean Water Act*. Washington, DC: National Academy Press.
- <sup>9</sup> Kiesecker, Joseph M., Holly E. Copeland, Bruce A. McKenney, Amy Pocerwicz, and Kevin E. Doherty. 2011. *Energy by Design: Making Mitigation Work for Conservation and Development*. Chapter 9 in: David E. Naugle (Ed.), *Energy Development and Wildlife Conservation in Western North America*. pp. 159-181.
- <sup>10</sup> Williams, B.K., and E.D. Brown. 2012. *Adaptive Management: The U.S. Department of the Interior Applications Guide*. Adaptive Management Working Group, U.S. Department of the Interior, Washington, DC.
- <sup>11</sup> Oregon Department of Transportation. October 2008. “OTIA III State Bridge Delivery Program: Environmental Programmatic Permitting Benefit/Cost Analysis.
- <sup>12</sup> Anderson, M. 2005. “Enhancing wetlands and watersheds using wetland banking, land trusts, and preservation within transportation mitigation: An analysis of the North Carolina Ecosystem Enhancement Program.” Trust for Public Lands.

## Selected Major Authorities, Regulations, and Guidance Addressing Mitigation

This strategy is supported by a variety of authorities, regulations, and guidance including, but not limited to:

**National Environmental Policy Act (NEPA) - 42 U.S.C. § 4371 et seq.** NEPA aims to integrate environmental values into decision making by requiring agencies to analyze the environmental impacts of proposed actions that may significantly impact the environment. 42 U.S.C. § 4332(2) (C). Council on Environmental Quality and Department of the Interior regulations implementing NEPA recognize the potential for mitigation to ameliorate impacts of a proposal and require agencies to include in their analyses appropriate mitigation measures not already included in the proposed action or alternatives. 40 C.F.R. §§ 1502.14(f), 1502.16(h); 43 C.F.R. § 46.130. Mitigation is defined broadly, to include means by which impacts can be avoided, minimized, rectified, and reduced, as well as means for compensating for impacts through replacement of resources. 40 C.F.R. § 1508.20. The regulations further require that agency decisions must “[s]tate whether all practicable means to avoid or minimize environmental harm from the alternative selected have been adopted, and if not, why they were not.” 40 C.F.R. § 1505.2(c). CEQ guidance recognizes the importance of mitigation, including the use of mitigation to ensure that impacts of a proposed action will not be significant, along with monitoring and other mechanisms for ensuring that mitigation is implemented, thus enabling agencies to reach a Finding of No Significant Impact (i.e., a “mitigated FONSI”). *Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact* (January 14, 2011).

**Federal Land Policy and Management Act (FLPMA) - 43 U.S.C. § 1701 et seq.** FLPMA requires that the public lands be managed “on the basis of multiple use and sustained yield,” 43 U.S.C. § 1701(a)(7), and “in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resources, and archeological values...” 43 U.S.C. § 1701(a)(8). Under the broad discretion afforded by FLPMA, the BLM can condition uses of the public lands authorized through various instruments (e.g., rights-of-way, permits, licenses, easements, etc.) on the implementation of mitigation measures intended to reduce impacts. The BLM’s recently issued draft mitigation policy provides policy, procedures, and instructions for developing strategies that identify and facilitate regional mitigation strategies, using BLM’s land use planning process to identify potential mitigation sites and measures, and identifying and implementing appropriate mitigation within or outside of the area of impact for particular land-use authorizations. *Interim Draft Policy on Regional Mitigation*; Manual Section 1794 (June 13, 2013).

**Mineral Leasing Act (MLA) - 30 U.S.C. § 181 et seq.** The MLA governs leasing of several minerals, most notably oil and gas. The BLM is required, at a minimum, to hold quarterly auctions of oil and gas leases in each state, 30 U.S.C. 226(b)(1). Leases are issued for 10 year terms and may be extended for as long as they produce oil or gas in paying quantities, and include stipulations for reducing impacts of development, *Id.*, 226(e); 43 C.F.R. 3101.1-3. Prior to drilling, operators must file an application for a permit to drill (APD) that, when issued, can require additional measures for mitigating anticipated impacts of development, 30 U.S.C. 226(f),(g).

**National Landscape Conservation System (NLCS, Organic Act) - 16 U.S.C. § 7201 et seq.** The NLCS was established “in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations” and that “The Secretary shall manage the system...in a manner that protects the values for which the components of the system were designated.” Under this direction, the BLM has implemented policy to require mitigation of impacts in order to protect the objects and values for which the units of the NLCS were designated. For example, BLM Manual Section 6100 § 1.6.A.3 describes how “valid existing rights and other non-discretionary uses occurring within NLCS units will be managed to mitigate associated impacts to the values for which these lands were designated”. Similarly, BLM Manual Section 6220 § 1.6.E.5.b describes how “the effects of projects from the grants of the (rights-of-way) must be mitigated” for National Monuments and National Conservation Areas. Additionally, BLM Manual Section 6100 § 1.6.C.5 identifies how NLCS units provide good locations for compensatory mitigation projects.

**Endangered Species Act of 1973 (ESA) - 16 U.S.C. § 1531 et seq.** Under sections 7 and 10 of the ESA, the FWS may recommend means to avoid and minimize the take of listed wildlife species, as well as to establish targeted habitat. Under section 7, Federal agencies must consult with FWS or National Marine Fisheries Service to ensure that agency actions are not likely to jeopardize the continued existence of a listed species or destroy or adversely modify designated critical habitat. The biological opinion issued by FWS or NMFS includes an incidental take statement, if appropriate, and provides reasonable and prudent measures that must be implemented to minimize the impacts of any anticipated take of listed wildlife species. Where a jeopardy or adverse modification opinion is rendered, reasonable and prudent alternatives will be recommended. Landowners who wish to develop private lands inhabited by listed wildlife species may receive an incidental take permit from FWS under Section

10, provided they have developed an approved habitat conservation plan (HCP), which sets out steps that the permit holder will take to avoid, minimize, and mitigate the impacts on species likely to occur from the proposed action. Off-site mitigation banks often play a key role in meeting conservation requirements under an HCP. Candidate Conservation Agreements, also under section 10, are voluntary agreements where landowners agree to carry out measures to assist in the conservation of candidate and other at-risk species.

The FWS issued a mitigation policy in 1981 to help the agency make consistent and effective mitigation recommendations to protect and conserve the most important and valuable fish and wildlife resources, while facilitating balanced development of the Nation's natural resources; U.S. Fish and Wildlife Service Mitigation Policy (46 FR 7644-7663, 1981). FWS has also issued guidance to help the agency evaluate proposals for establishing conservation banks for the purpose of off-setting adverse impacts to listed species. Guidance for the Establishment, Use, and Operation of Conservation Banks (May 2, 2003). More recently, FWS issued draft guidance that describes a crediting framework for Federal agencies in carrying out recovery of threatened and endangered species. Under the draft guidance, Federal agencies could show how adverse effects of agency activities to a listed species are offset by beneficial actions taken elsewhere for that species, so long as there is a net conservation benefit to the species. Draft Guidance on Recovery Crediting for the Conservation of Threatened and Endangered Species; 72 Federal Register 62258 (November 2, 2007).

***Fish and Wildlife Coordination Act (FWCA) - 16 USC § 661-667e.*** The FWCA establishes fish and wildlife conservation as a coequal objective of all federally-funded, permitted, or licensed water-related development projects. Under the FWCA, Federal agencies developing such projects must consult with FWS (and NMFS in some instances) and the states regarding fish and wildlife impacts. The statute provides FWS with authority to investigate and prepare reports providing mitigation analyses on all water-related development projects; FWS mitigation recommendations may include measures addressing a broad set of habitats beyond the aquatic impacts triggering the FWCA and species beyond those covered by other resource laws.

***National Historic Preservation Act (NHPA) - 16 U.S.C. § 470 et seq.*** The NHPA is a procedural statute that requires Federal agencies under Section 106 to take into account the effects of their undertakings on historic properties, and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on these undertakings. For the purposes

of NHPA, historic properties include properties that are listed in or eligible for listing in the National Register of Historic Places. Through the implementing regulations of Section 106, which are contained in 36 CFR Part 800, "Protection of Historic Properties," federal agencies are required to consult with State/Tribal Historic Preservation Officers, Indian tribes or Native Hawaiian Organizations, local governments, interested parties such as historic preservation advocacy organizations, the public, and the ACHP. Consultation includes assessing whether or not the undertaking will have adverse effects on such properties and measures to resolve those adverse effects. Section 110(f) specifically addresses mitigation of adverse effects to properties of national significance, requiring that "prior to the approval of any Federal undertaking which may directly and indirectly affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark." In many instances, the Section 106 consultation process will result in the execution of a memorandum of agreement, see 36 C.F.R. § 800.6(c), which may include federal agency commitments to avoid or mitigate any adverse effects.

***Clean Water Act - 33 U.S.C. § 1251 et seq.*** Section 404 of the Clean Water Act provides extensive authority to the U.S. Army Corps of Engineers and the Environmental Protection Agency to conduct mitigation where federal actions impact waters of the United States. The FWS has specific authority under section 404(m) to secure mitigation for impacts to aquatic resources nationwide. Section 404 (m) requires the Secretary of the Army to notify the Secretary of the Interior, through the FWS Director, when a permit application has been received or when the Secretary proposes to issue a general permit, and FWS can submit written comments within 90 days. Through its comments, FWS can assist the Corps of Engineers in developing permit terms that avoid, minimize or compensate for permitted impacts. Through its policy on compensatory mitigation related to the National Wildlife Refuge System, FWS has established guidelines for using Refuge lands for siting compensatory mitigation for impacts permitted through section 404 or section 10 of the Rivers and Harbors Act. Final Policy on the National Wildlife Refuge System and Compensatory Mitigation under the Section 10/404 Program (64 FR 49229-49234, 1999).

***Clean Air Act - §7401, et seq.*** The Clean Air Act calls for the prevention and control of air pollution across the country and includes a national goal to "to preserve, protect and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreational, scenic or historic value" (42 U.S.C. §7470(2)). It sets forth an affirmative duty to protect air quality and air quality related values (e.g., visibility and



ecosystem resources) of national parks and wilderness areas designated as Class I areas under the statute by avoiding and minimizing impacts to such areas. The Clean Air Act also provides for the banking and trading of emissions reductions and use of emission offsets to capture cost efficiencies. The NPS, BLM, FWS, US Forest Service and the EPA have entered into a memorandum of understanding that adopts a standardized approach that facilitates the completion of NEPA environmental analyses for federal land use planning and oil and gas development decisions and leads to improved design and implementation of mitigation measures that will both protect air quality and air quality related values and provide opportunities for future oil and gas development.

***NPS Organic Act of 1916 and General Authorities Act of 1970, as amended - 16 U.S.C. §1, et seq.*** Under the Organic Act, the National Park Service (NPS) in the Department of the Interior is charged with managing the units of the National Park System so as to “conserve the scenery and the national and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. Through the General Authorities Act as amended, Congress directed that “the authorization of activities shall be construed and the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as many have been or shall be directly and specifically provided by Congress.” These authorities, among others, provide a framework for the Secretary of the Interior to be proactive in protecting the resources and values of the National Park System and for bureaus within the Department to mitigate the impacts of their discretionary activities on the resources and values of park units.

***Paleontological Resources Preservation Act (PRPA) - 16 U.S.C. § 470 aaa et seq.*** This statute states that federal agencies “shall manage and protect paleontological resources on Federal land using scientific principles and expertise.” In areas determined to have high or undetermined potential for significant paleontological resources, the agency must implement an adequate program for mitigating the impact of development, including surveys, monitoring, salvage, identification and reporting, and other activities required by law.

#### ***White House Guidance and Initiatives***

***Executive Order (EO) 13604 on Improving Performance of Federal Permitting and Review of Infrastructure Projects (March 28, 2012).*** The EO calls for more timely and efficient Federal permitting and review of infrastructure projects while improving environmental

and community outcomes. To achieve that objective, the order calls on agencies to integrate reforms into project planning processes “so that projects are designed appropriately to avoid, to the extent practicable, adverse impacts on public health, security, historic properties and other cultural resources, and the environment, and to minimize or mitigation impacts that may occur.”

***A Federal Plan for Modernizing the Federal Permitting and Review Process for Better Projects, Improved Environmental and Community Outcomes, and Quicker Decisions (June 2012).*** The Plan calls on Federal agencies to identify opportunities to improve mitigation processes by integrating intra- and inter-agency processes and encouraging mitigation planning at the regional, watershed and landscape levels, and to move away from addressing mitigation at the end of project development and on a project-by-project basis.

#### ***Presidential Memorandum on Modernizing Federal Infrastructure Review and Permitting Regulations, Policies, and Procedures (May 17, 2013).***

The Memorandum recognizes landscape- and watershed-level mitigation practices as means by which agencies have achieved better outcomes for communities and the environment and realized substantial time savings in review and permitting. The Memorandum directs an interagency leadership team to, among other things, expand the use of IT tools to facilitate monitoring of mitigation commitments and “identify improvements to mitigation policies to provide project developers with added predictability, facilitate landscape-scale mitigation based on conservation plans and regional environmental assessments, facilitate interagency mitigation plans where appropriate, ensure accountability and the long-term effectiveness of mitigation activities, and utilize innovative mechanisms where appropriate.”

#### ***Implementation Plan for the Presidential Memorandum on Modernizing Infrastructure Permitting (March 2014).***

The Plan includes actions to identify policy changes to promote in-advance, landscape-scale mitigation; to facilitate high-quality and efficient permitting and review processes; to identify best practices for early engagement with tribal, state, and local governments; and to expand innovative mitigation approaches that facilitate landscape-level mitigation planning, consistent and transparent standards for applying the mitigation hierarchy, and use of in-lieu fee program and mitigation banks. The overall goal of the plan is to “modernize the Federal permitting and review process for major infrastructure projects to reduce uncertainty for project applicants, reduce the aggregate time it takes to conduct reviews and make permitting decisions by half, and produce measurably better environmental and community outcomes.”

## Appendix II

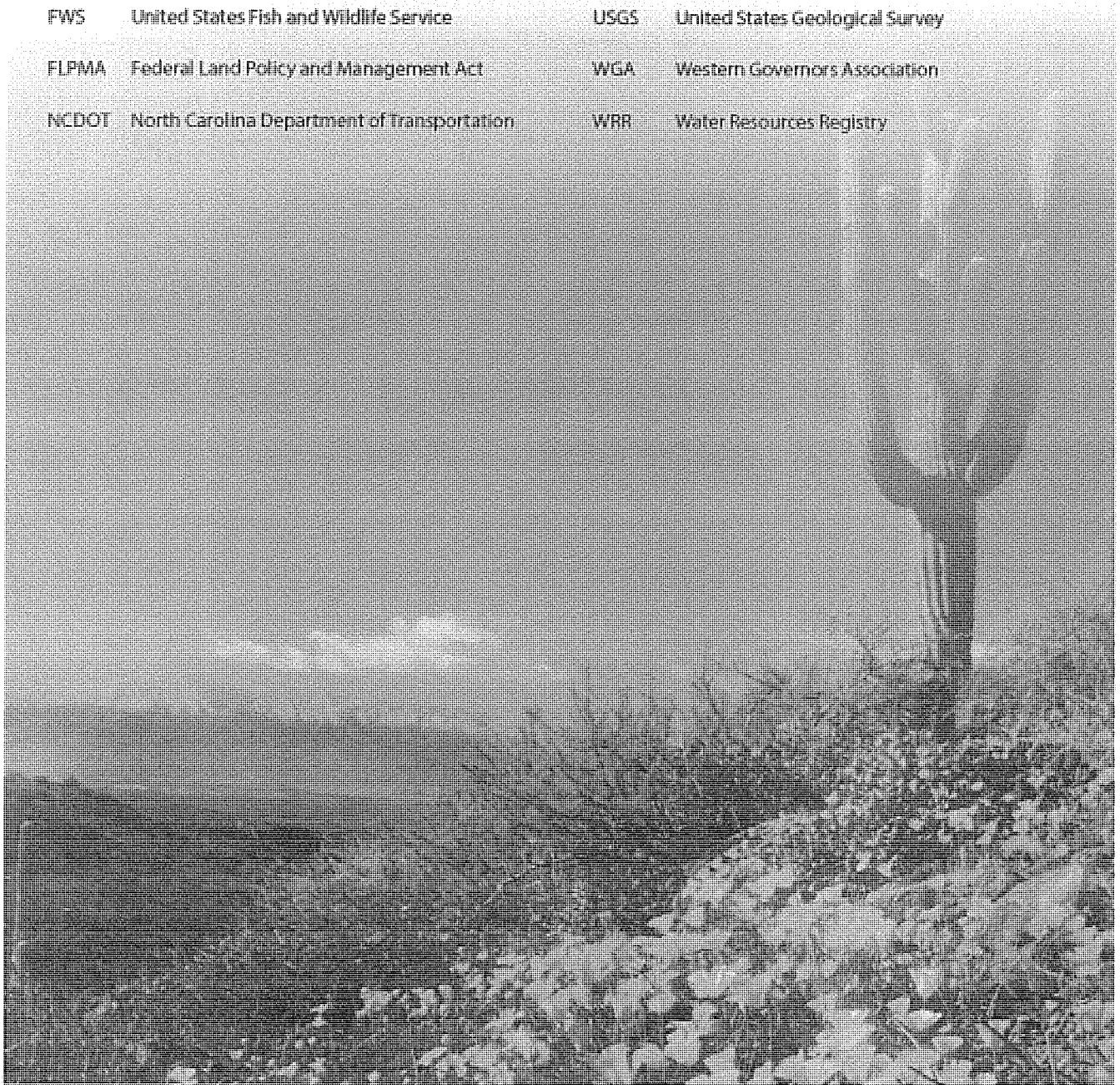
Subsequent to the Secretarial Order and during the preparation of this report, the Climate and Energy Task Force communicated with many federal, state, and private partners and stakeholders. This outreach process is ongoing and will continue to inform the development and implementation of the Department's mitigation policies as this strategy takes shape. The following entities are representative of the many partners contacted:

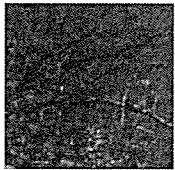
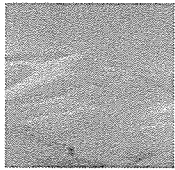
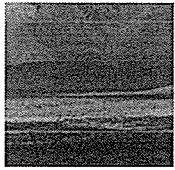
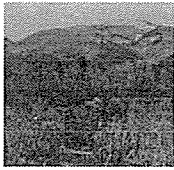
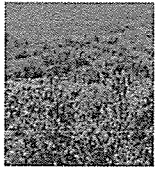
- U.S. Department of Agriculture
- U.S. Department of Transportation
- U.S. Army Corps of Engineers
- U.S. Environmental Protection Agency
- White House Office of Management and Budget
- Federal Energy Regulatory Commission
- Advisory Council on Historic Preservation
- State of California, Office of the Governor
- State of Maryland
- Western Governors Association
- Solar Energy Industries Association
- American Wind Energy Association
- National Mitigation Bankers Association
- The Nature Conservancy
- The Wilderness Society
- Defenders of Wildlife
- The Conservation Fund
- Natural Resources Defense Council
- Theodore Roosevelt Conservation Partnership
- Southern Nevada Water Authority
- Noble Energy
- Ultra Petroleum
- Newfield Exploration Company
- Bill Barrett Corporation
- Beatty and Wozniak, P.C.



## Key To Acronyms

BLM	Bureau of Land Management	NEPA	National Environmental Policy Act
BOEM	Bureau of Ocean Energy Management	NHPA	National Historic Preservation Act
CHAT	Crucial Habitat Assessment Tool	NPS	National Park Service
DRECP	Desert Renewable Energy Conservation Plan	OCS	Outer Continental Shelf
EEP	Ecosystem Enhancement Program	OTIA	Oregon Transportation Investment Act
ESA	Endangered Species Act	SEZ	Solar Energy Zone
FWS	United States Fish and Wildlife Service	USGS	United States Geological Survey
FLPMA	Federal Land Policy and Management Act	WGA	Western Governors Association
NCDOT	North Carolina Department of Transportation	WRR	Water Resources Registry





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Craters of the Moon National Monument  
P.O. Box 29  
Arco, ID 83213

**Commented [GJD1]:** Cooperating Agencies receive a copy of the Executive Summary, Plus Volumes II A&B.

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Chuck Mark, Forest Supervisor  
Salmon-Challis National Forest  
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Salmon, ID 83467

**Tribes receive a copy of the Executive Summary, Plus  
Volumes I and II.**

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Browning, Montana 59417

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Duck Valley Shoshone-Paiute Tribe  
P.O. Box 219  
Owyhee, NV 89832-0219

Tribal Chairman  
Confederated Salish & Kootenai Tribes  
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Pablo, Montana 59855

Chief Allan, Chairman  
Coeur d'Alene Tribe  
850 A Street, Plummer ID 83851

Shoshone-Bannock Tribes  
c/o Danny Stone and Hunter Osborne  
P.O. Box 306  
Fort Hall, ID 83203

Kootenai Tribe  
c/o Billy Barquin and Patty Perry  
PO Box 1269  
Bonners Ferry, Idaho 83805

Tribal Chairman  
Kootenai Tribe  
PO Box 1269  
Bonners Ferry, Idaho 83805

Nez Perce Tribe  
c/o Michael Lopez and Aaron Miles  
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C/O Wilfred Ferris  
P.O. Box 217  
Fort Washakie, Wyoming 82514

Tribal Chairman  
Shoshone Tribe of the Wind River Reservation  
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Fort Washakie, Wyoming 82514

Chairman Nathan Small  
Shoshone-Bannock Tribes  
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Ted Howard, Cultural Resources Director  
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850 A Street  
Plummer, Idaho 83851

Heather Keen and Tiffany Allgood  
Coeur d'Alene Tribe  
850 A Street  
Plummer, Idaho 83851

Cleve Davis  
Environmental Coordinator  
Shoshone-Bannock Tribes  
P.O. Box 306  
Fort Hall Idaho 83203



## Brent Ralston

---

**From:** Gardetto, Jessica  
**Sent:** Friday, July 11, 2014 2:16 PM  
**To:** Brent Ralston  
**Subject:** CA Mailing List  
**Attachments:** CA\_agencies\_mailing\_FEIS\_letter\_4.24.14.doc

IDMT\_PUB\_9797  
3.2

Hey B,

Got your voice mail; here's the list I used to mail the letters/the CDs for review, etc. I am not sure how Idaho Power ended up with one? Maybe someone gave him a copy? I did not send him one. Weird...

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

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Idaho Falls, ID 83415

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Idaho Association of Counties  
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Rebecca Nourse, Forest Supervisor  
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Chairman  
PO Box 306  
Fort Hall, ID 83203

Confederated Salish & Kootenai Tribes  
42487 Complex Blvd.  
PO Box 278  
Pablo, Montana 59855

**Brent Ralston**

---

**From:** Gardetto, Jessica  
**Sent:** Tuesday, July 22, 2014 1:15 PM  
**To:** Brent Ralston  
**Subject:** Re: FW: Review of Administrative Draft Proposed Plan  
**Attachments:** CA\_agencies\_mailing\_Updated\_7.22.14.doc

IDMT\_PUB\_9799  
3.2

FYI/for your reference, here's my updated CA mailing list.

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

On Tue, Jul 22, 2014 at 12:53 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Jessica,

Can you update Doug's address on our mailing list for Cooperating Agencies.

Thanks!

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

---

**From:** Doug Balfour [mailto:[dbal0680@gmail.com](mailto:dbal0680@gmail.com)]  
**Sent:** Tuesday, July 15, 2014 2:42 PM  
**To:** Brent Ralston  
**Subject:** Re: Review of Administrative Draft Proposed Plan

PO Box 490 Pocatello 83204, or 230 W Lewis, 83204. Yes, we had this problem before. It will get lost in the Courthouse. The Commissioners do not meet that frequently. Doug

---

**From:** [Brent Ralston](#)  
**Sent:** Tuesday, July 15, 2014 1:22 PM  
**To:** [Douglas J. Balfour](#)  
**Subject:** RE: Review of Administrative Draft Proposed Plan

Doug,

It does look like we sent it to American Falls –

Douglas J. Balfour  
Power County Commissioners  
  
Power County Courthouse  
  
543 Bannock Avenue  
  
American Falls, Idaho 83211-1200

Is there another address you want us to use to get you mailings more quickly. I apologize if you've already provided that and I have not updated our mailing list. There are a lot of moving parts and I apologize if I missed this one.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

---

**From:** Douglas J. Balfour [mailto:[dbal0680@gmail.com](mailto:dbal0680@gmail.com)]  
**Sent:** Tuesday, July 15, 2014 1:14 PM  
**To:** Brent Ralston  
**Subject:** Re: Review of Administrative Draft Proposed Plan

Thanks. Did you send them to American Falls instead of me?

**From:** [Brent Ralston](#)

**Sent:** Tuesday, July 15, 2014 12:37 PM

**To:** [Douglas J. Balfour](#)

**Subject:** RE: Review of Administrative Draft Proposed Plan

Doug,

Here is an electronic version that was sent out on the CDs.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

---

**From:** Douglas J. Balfour [mailto:[dbal0680@gmail.com](mailto:dbal0680@gmail.com)]  
**Sent:** Tuesday, July 15, 2014 8:49 AM  
**To:** Brent Ralston  
**Subject:** Re: Review of Administrative Draft Proposed Plan

Brent, I have not received anything yet. Doug

---

**From:** [Brent Ralston](#)

**Sent:** Monday, July 14, 2014 11:22 PM

**To:** [Angenie McCleary](#) ; [Bob Shirley](#) ; [Dennis Crane](#) ; [Dennis Crane](#) ; [depperjd@id.doe.gov](mailto:depperjd@id.doe.gov) ; [dmlamb01@gmail.com](mailto:dmlamb01@gmail.com) ; [Douglas Balfour](#) ; [Douglas Balfour](#) ; [Happel, Dan](#) ; [James Hart](#) ; [Jerald Raymond](#) ; [Jerry Hoagland](#) ; [Ladd Carter](#) ; [Lawrence Schoen](#) ; [Lee Miller](#) ; [Meredith Zaccherio](#) ; [Mickelsen, Robert](#) ; [OCNRCDIR@aol.com](mailto:OCNRCDIR@aol.com) ; [Robert Cope](#) ; [Seth Grigg](#) ; [Terry Kramer](#) ; [Thoms Rice](#) ; [Todd\\_Stefanic@nps.gov](mailto:Todd_Stefanic@nps.gov) ; [Wayne Butts](#) ; [William Frederiksen](#)

**Subject:** Review of Administrative Draft Proposed Plan

Just a quick follow-up to the information we discussed at the recent call about your opportunity to review the Administrative Draft Proposed Plan (ADPP) –

On the call I indicated a deadline for comments back to BLM by July 18<sup>th</sup>. I had assumed our mailing would reach you not later than July 11<sup>th</sup>. It seems that was not the case and most folks are only now receiving the review materials. I still want to afford you the two weeks for review we spoke of and in that spirit need to delay the comment deadline until July 25<sup>th</sup>.

If you still have not received the materials please let me know.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

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Helena, MT 59601

David R. Myers, Forest Supervisor  
Beaverhead-Deerlodge National Forest  
420 Barrett St.  
Dillon, MT 59725-3572

William Frederiksen, Representative  
Clark County Commissioners  
320 West Main Street  
Dubois, Idaho 83423

Madelyn Dillon  
2150 A Centre Ave Suite 300  
Fort Collins, CO 80526

Jeff Burwell and Karen Fullen  
Natural Resources Conservation Service  
9173 W. Barnes Dr., Suite C  
Boise, ID 83709

Ryan Tingey, Commission Chair  
Box Elder County Commissioners  
1 South Main St  
Brigham City, UT 84302

Cecilia Seesholtz, Forest Supervisor  
Boise National Forest  
1249 S. Vinnell Way, Suite 200  
Boise, ID 83709

Don Kemner  
Idaho Department of Fish and Game  
P.O. Box 25  
Boise, ID 83707

Brent Larson, Forest Supervisor  
Caribou-Targhee National Forest  
1405 Hollipark Drive  
Idaho Falls, Idaho 83401

Chuck Mark, Forest Supervisor  
Salmon-Challis National Forest  
1206 S. Challis Street  
Salmon, ID 83467

Idaho and Southwestern Montana Sub Regional Effort  
Cooperating Agencies

Federal – National

USFS  
USFWS

Federal – Local

Natural Resources Conservation Service

Forest Service –

Beaverhead-Deer Lodge  
Boise  
Caribou-Targhee  
Salmon-Challis  
Sawtooth

Department of Energy – Idaho National Laboratory

National Park Service – Craters of the Moon National Monument

State

Idaho Office of Species Conservation  
Idaho Department of Fish and Game  
Montana Fish Wildlife and Parks

County

Idaho Association of Counties

Bingham County  
Blaine County  
Cassia County  
Clark County  
Fremont County  
Jefferson County  
Lemhi County  
Owyhee County  
Power County  
Twin Falls County

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Monday, June 16, 2014 12:57 PM  
**To:** Bryan Fuell  
**Subject:** RE: Elko TF Agreement

No, just painfully long tenure with no option of adjustment.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

**From:** Fuell, Bryan [<mailto:bfuell@blm.gov>]  
**Sent:** Monday, June 16, 2014 12:55 PM  
**To:** Brent Ralston  
**Subject:** Re: Elko TF Agreement

Sure  
Does the EIS address early outs

On Mon, Jun 16, 2014 at 11:52 AM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Bryan,

Thanks – you are responsive – I also have an EIS that needs finished can you work on that?

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

**From:** Fuell, Bryan [<mailto:bfuell@blm.gov>]  
**Sent:** Monday, June 16, 2014 10:49 AM  
**To:** Brent Ralston  
**Subject:** Elko TF Agreement

Brent

It was good to see you

Here is the agreement I promised

No i am not super efficient If I did not send it to quick I would have long forgot

Keep LAFing

Bryan

Bryan K Fuell

Wells Field Manager

775 753-0210 Office

775 934-1231 Cell

[bfuell@blm.gov](mailto:bfuell@blm.gov)

“Everyday is a gift” - L. Barrett

--

Bryan K Fuell

Wells Field Manager

775 753-0210 Office

775 934-1231 Cell

[bfuell@blm.gov](mailto:bfuell@blm.gov)

“Everyday is a gift” - L. Barrett

**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
TWIN FALLS DISTRICT, IDAHO  
AND  
ELKO DISTRICT, NEVADA**

**I. Introduction**

This Memorandum of Understanding (MOU) is between the United States Department of the Interior, Bureau of Land Management (BLM), Twin Falls District and United States Department of the Interior, Bureau of Land Management (BLM), and Elko District; jointly referred to as the "Parties."

**II. Purposes**

- A. Clearly identify the Idaho/Nevada border as the official boundary between the Twin Falls District and Elko District within the China Creek, Player Butte, Player Canyon, and Horse Creek Allotments. *See attached maps for details.*
- B. Define the Twin Falls District and Elko District Management responsibilities within the Nevada portions of the China Creek, Player Canyon, and Horse Creek Allotments. These public lands are described below and will be referred to in this document as the "subject public lands."

The portions of Township 47N, Range 63E Sections 4, 5 & 6 that fall within the Nevada public lands of the Player Canyon Allotment; portions of Township 47N, Range 63E Sections 2, 3, & 4 of the Player Butte Allotment; and portions of Township 47N, Range 63E Sections 1 & 2, and portions of Township 47N, Range 64E Sections 5 & 6 within the Nevada public lands of the China Creek Allotment; and portions of Township 47N, Range 67E Sections 2 and 3 of the Horse Creek Allotment. See attached maps for details.

**III. Background**

- A. The BLM Idaho GIS data depicting the Twin Falls District, Jarbidge Field Office Administrative Unit Boundary incorrectly follows the southern extents of the China Creek, Player Butte, and Player Canyon allotments in Nevada. It is assumed that the Jarbidge Field Office boundary was (incorrectly) mapped this way to reflect Idaho's grazing administration responsibilities in Nevada according to MOU Idaho -6 signed in 1969. This same error was propagated in the 1987 Jarbidge RMP planning maps. The Wells Field Office boundary has correctly mapped their Field Office boundary along

the Idaho/Nevada state line in this area.

- B. MOU Idaho -6 provided the Jarbidge Field Office with grazing administration within the subject public land. This MOU will expand upon those responsibilities for the Twin Falls District to include vegetation management actions such as Emergency Stabilization and Rehabilitation (ES&R), hazardous fuels reduction, wildlife habitat restoration and weed treatments on public lands within the China Creek, Player Butte, and Player Canyon allotments within subject public land.
- C. The BLM Idaho GIS data depicting the Twin Falls District, Burley Field Office Administrative Unit Boundary correctly follows the Idaho/Nevada State boundary. The Burley Field Office and Wells Field Office have been managing the above mentioned land in accordance with the Horse Creek Allotment Agreement which was signed in 1980. This agreement assigned grazing administration of this portion of land to the Burley Field Office (formerly District). This MOU will expand upon those responsibilities for the Twin Falls District, Burley Field Office to include vegetation management actions such as ES&R, hazardous fuels reduction, wildlife habitat restoration and weed treatments on public lands within the Horse Creek Allotment portion of subject public land.

#### **IV. Authorities**

Federal Land Policy Act of 1969 (42 USC 4321 et seq.)

Nothing in this MOU alters or supersedes the authorities and responsibilities of any of the Parties on any matter under their respective jurisdictions.

#### **V. Roles and Responsibilities**

- A. The Twin Falls District roles and responsibilities include:
  1. The Twin Falls District GIS Specialist will correct the BLM Idaho GIS data to follow the Idaho/Nevada state line for its District boundary.
  2. The Twin Falls District will be responsible for the administration of livestock grazing for the subject public lands.
  3. The Twin Falls District will be responsible for all vegetation management within the subject public land, including activities such as ES&R hazardous fuels reduction, threatened and endangered vegetation management, wildlife habitat restoration and

treatment of noxious weeds. ES&R on subject public lands will be managed according to the current Twin Falls District ES&R Plan.

4. The Twin Falls District will coordinate with Elko District Office Nevada on all resources affected by actions taken for grazing permit renewal or modification or vegetation management within the subject public land.

B. The Elko District roles and responsibilities include:

1. The Elko District will be responsible for all resources and activities on public lands within the subject public land with the exception of livestock grazing administration and vegetation management.
2. The Elko District will coordinate with the Twin Falls District Office on all actions that would affect the administration of livestock grazing or vegetation management within the subject public land.

## **VI. Representatives**

The Parties will designate representatives as specified in Exhibit A to ensure coordination during the implementation of this MOU. The Parties may change their point of contact at any time by providing a revised Exhibit A to the other Party. Any revisions must be added to the official file.

## **VII. Funding**

- A. Subject to the availability of funds, the Parties agree to fund their own expenses associated with the implementation of this MOU.
- B. Nothing contained herein shall be construed as obligating the BLM to any expenditure or obligation of funds in excess or in advance of appropriations, in accordance with the Anti-Deficiency Act, 31 U.S.C. § 1341.

## **VIII. Records**

Any records or documents generated as a result of this MOU shall become part of the official BLM record maintained in accordance with applicable BLM Records Management policies. Any request for release of records associated with the implementation of this MOU to anyone outside the Parties must be determined by the BLM based on applicable laws, including the Freedom of Information Act and the Privacy Act.

## **IX. Tribal Consultations**

The Twin Falls District as appropriate shall engage in government-to-government consultation with all actions as associated with this agreement with affected Indian Tribe(s) during all phases of this process, in accordance with applicable Federal statutes,



regulations, and other authorities, including Executive Order 13175 on consultation with Indian Tribes and Executive Order 13007 on Indian Sacred Sites. This MOU in no way affects the responsibility of the BLM and the authority of affected Tribe(s) to engage in these government-to-government consultations. To the extent the BLM receives any Indian Trust data as a function of the requirement to conduct government-to-government consultations with affected Indian Tribe(s), the BLM certifies it will accord such data all necessary protection and security pursuant to applicable statutes, regulations, and policies, including those set forth in the context of any applicable litigation.

**X. Compliance with Applicable Laws and Regulations; Severability Clause**

This MOU is subject to all applicable Federal laws, regulations and rules, whether now in force or hereafter enacted or promulgated. Nothing in this MOU shall be construed as in any way impairing the general powers of the BLM under such applicable laws, regulations, and rules. If any term or provision of this MOU is held to be invalid or illegal, such term or provision shall not affect the validity or enforceability of the remaining terms and provisions. Meeting the terms of this MOU shall not excuse any failure to comply with all applicable laws and regulations, whether or not these laws and regulations are specifically listed herein.

**XI. Term, Amendment, and Termination**

A. Term of MOU:

1. This MOU becomes effective upon the date last signed and executed by the duly authorized representative of the Parties to this MOU.
2. This MOU shall remain in effect for five (5) years from the execution date unless terminated or cancelled by either party prior to the expiration date.

B. Amendments:

1. The Parties may request changes to this MOU, which shall be effective only upon the written agreement of all Parties.
2. Any changes, modification, revisions, or amendments to this MOU shall be incorporated by written instrument, executed and signed by all Parties, and will be effective in accordance with the terms and conditions contained herein.

C. Termination:

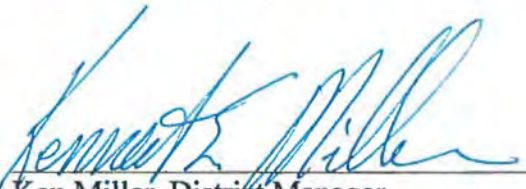
This MOU may be terminated prior to the expiration date upon 30-day written notice and agreement between all parties to terminate this MOU.

**XII. Signatures**

- A. All signatories have the appropriate delegation of authority to sign this MOU.
- B. The Parties hereto have executed this MOU on the dates shown below.

  
\_\_\_\_\_  
Mel M. Meier, District Manager  
Twin Falls District, BLM Idaho

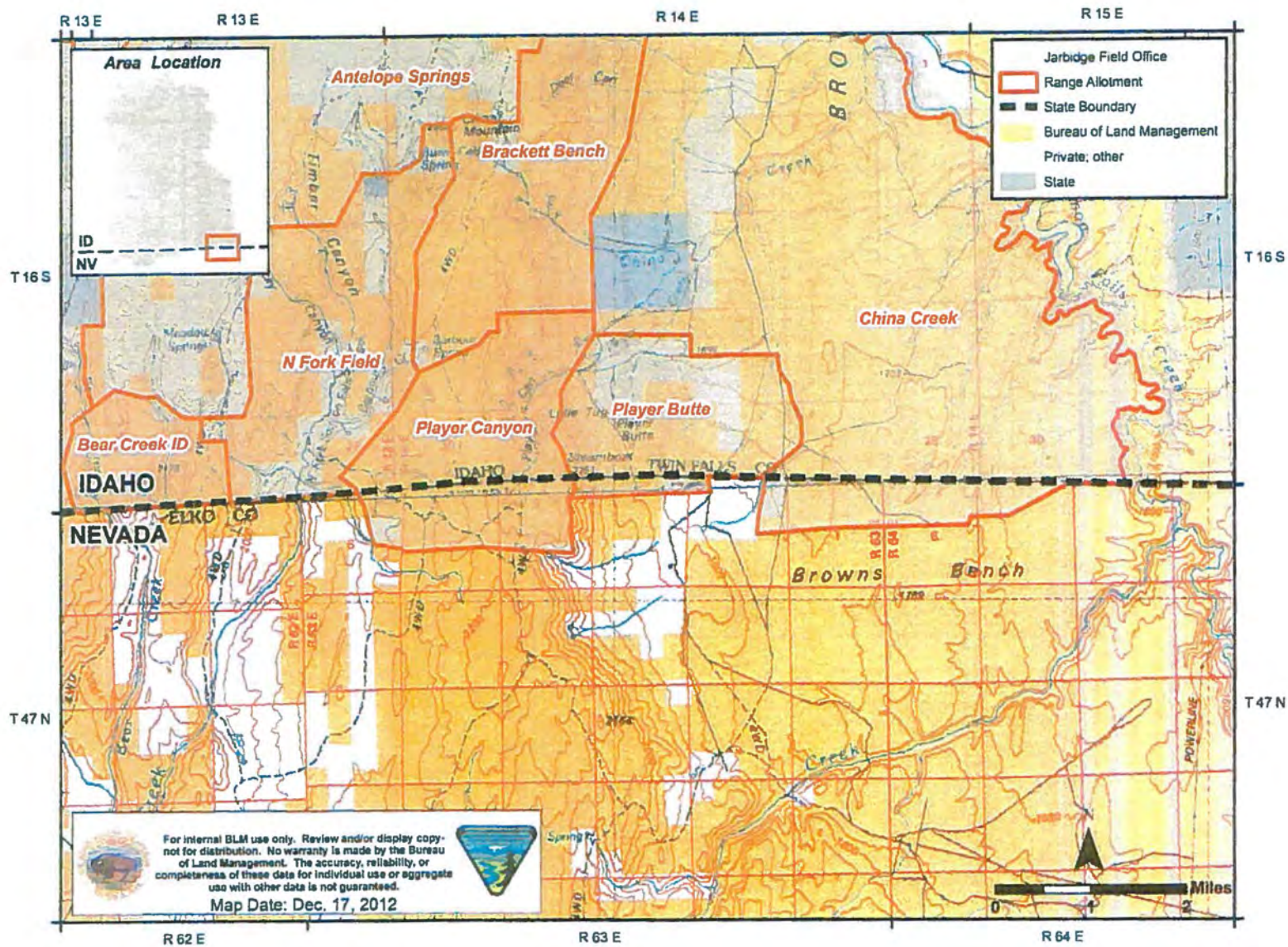
  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Ken Miller, District Manager  
Elko District, BLM Nevada

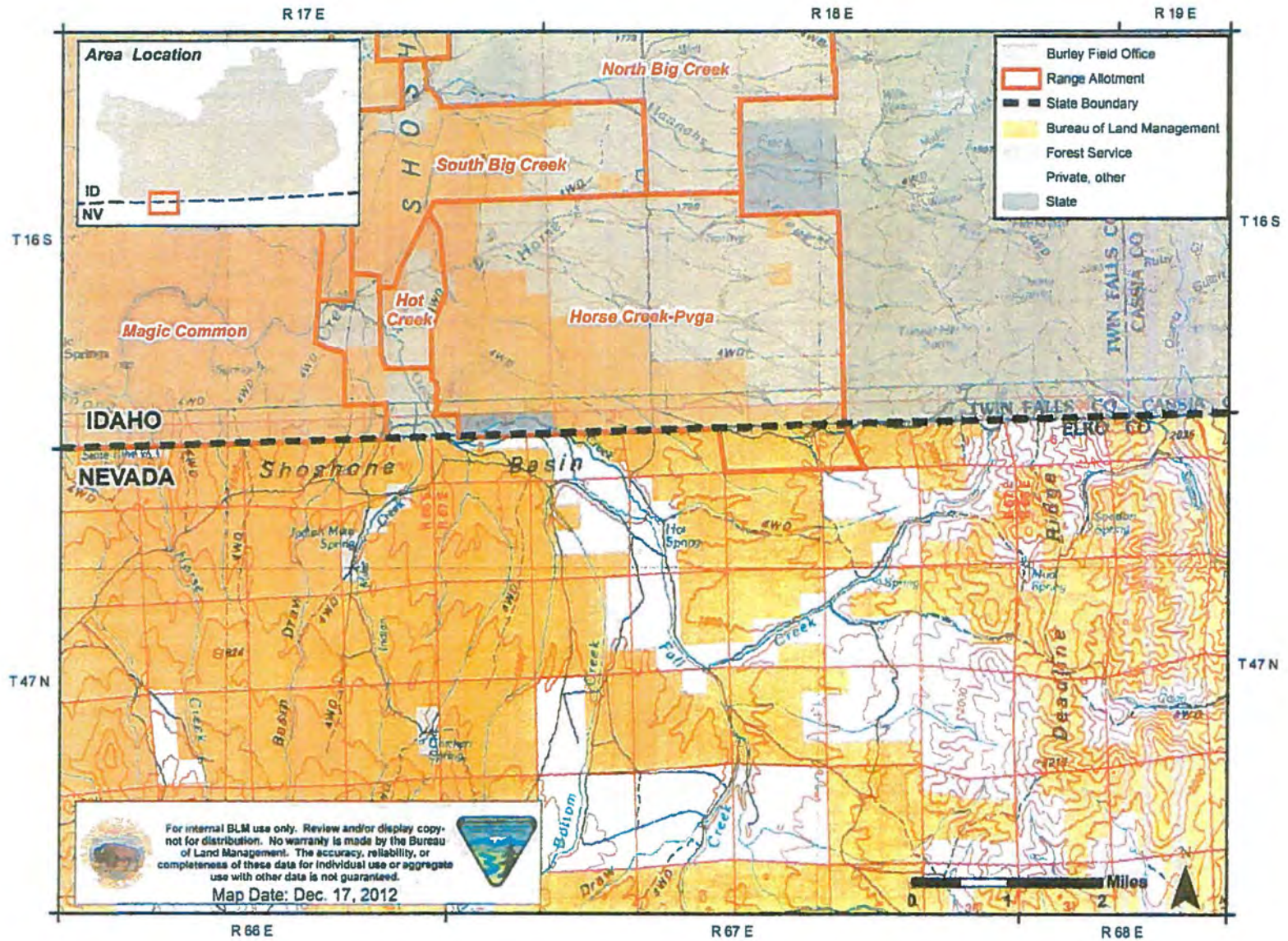
  
\_\_\_\_\_  
Date

**4 Attachments:**

- 1 – Map 1: China Creek, Player Butte, and Player Canyon Allotments; Idaho/Nevada Border
- 2 - Map 2: Horse Creek Allotment, Idaho/Nevada Border
- 3 - Map 3: Subject Public Land; Idaho/Nevada Border
- 4 - Exhibit A: Contacts

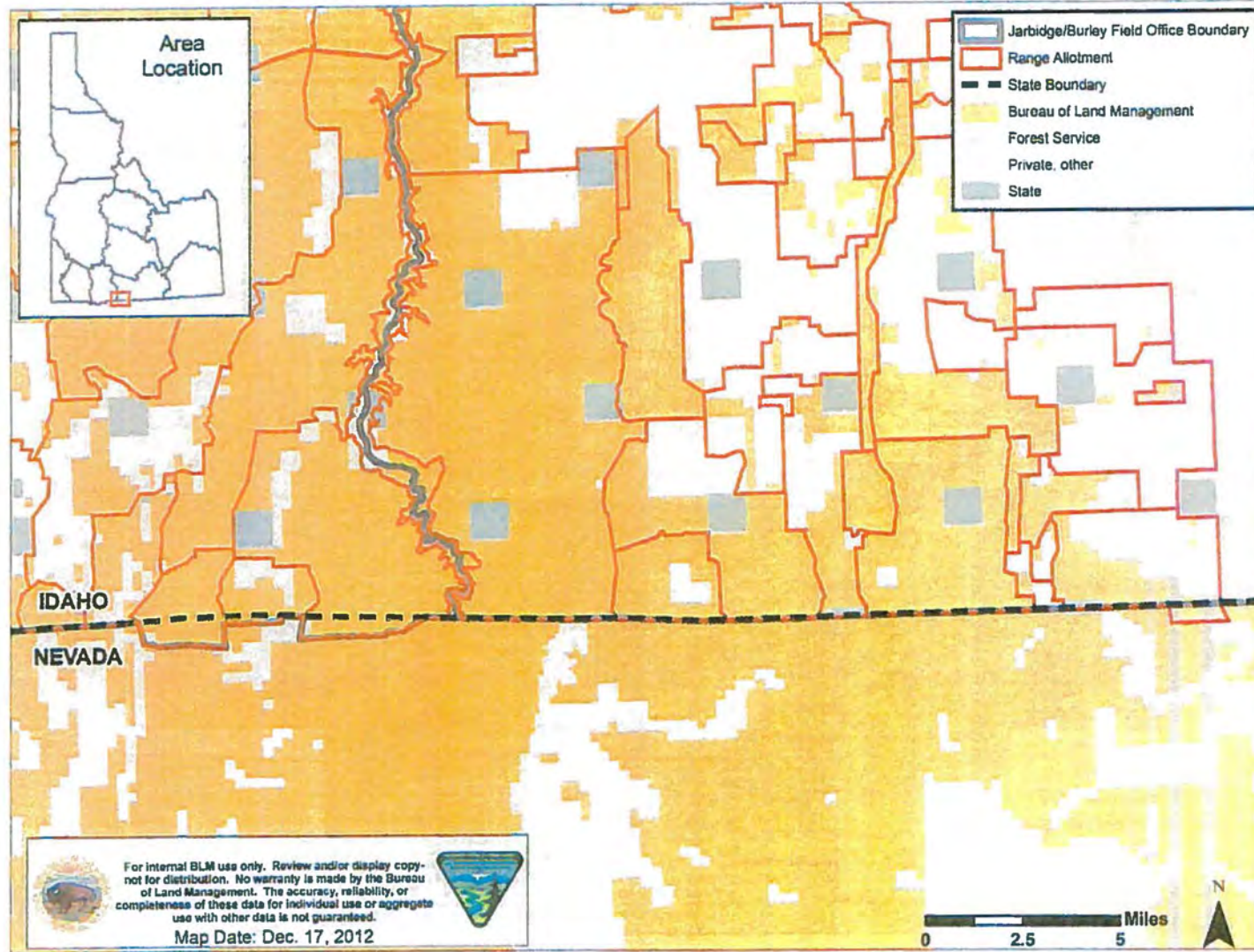


Map 1: China Creek, Player Butte, and Player Canyon Allotments; Idaho/Nevada Border



Map 2: Horse Creek Allotment, Idaho/Nevada Border

### BLM Idaho, Twin Falls District, Jarbidge & Burley Field Office



Map 3: Subject Public Land; Idaho/Nevada Border

## Exhibit A

### Contacts:

<b>Cooperator Program Contact</b>	<b>Cooperator Administrative Contact</b>
<p>Bryan Fuell Wells Field Manager Bureau of Land Management 3900 Idaho Street Elko, NV 89801 775-753-0210 Fax: (775) 753-0385 Email: bfuell@blm.gov</p>	<p>David Overcast Associate District Manager Bureau of Land Management 3900 Idaho Street Elko, NV 89801 Telephone: 775-753-0320 Fax: (775) 753-0255 Email: dovercas@blm.gov</p>

<b>Bureau of Land Management Contact</b>	<b>Bureau of Land Management Administrative Contact</b>
<p>Brian Davis Jarbidge Field Manager Bureau of Land Management 2536 Kimberly Road Twin Falls ID 83301 Telephone: (208) 736-2380 Fax: (208) 735-2076 Email: bdavis@blm.gov</p>	<p>Beckie Wagoner District Records Assistant Bureau of Land Management 2536 Kimberly Road Twin Falls ID 83301 Telephone: (208) 735-2063 Fax: (208) 735-2076 Email: bwagoner@blm.gov</p>

**Brent Ralston**

---

**From:** Lauren Mermejo  
**Sent:** Monday, July 07, 2014 11:31 AM  
**To:** Joan Suther; Melvin (Joe) Tague; Quincy Bahr; Brent Ralston  
**Cc:** ccolt@fs.fed.us  
**Subject:** FW: GRSG: Contact list Sec 7 Consultation (BLM, FS, FWS points of contact by EIS)  
**Attachments:** GRSG\_Sec7ConsultationContacts\_FwsBlmFs\_07032014.xlsx

Hey Yo'all –

Just wanted you to see what Kim Tripp sent to your T&E specialists. I hope you are all setting up your calls with Chris Colt this week (or next for Idaho).

Thanks,  
Lauren

**From:** Tripp, Kim [mailto:[ktripp@blm.gov](mailto:ktripp@blm.gov)]  
**Sent:** Monday, July 07, 2014 10:11 AM  
**To:** Lisa Belmonte; Scott Hoefer; Mark Snyder; John Carlson; Ronald Bolander; Arlene Kosic; Glenn Frederick  
**Cc:** Stephen Small; Kathryn Stangl; Lauren Mermejo; Johanna Munson  
**Subject:** Fwd: GRSG: Contact list Sec 7 Consultation (BLM, FS, FWS points of contact by EIS)

Hello,

As the national contact for the Section 7 Greater Sage-grouse Consultations, I have been in routine conversations with USFS and USFWS. We have all identified a greater need for local engagement between all three agencies in regard to the specific drafting of each Biological Assessment.

Attached is a spreadsheet indicating the specific contacts for each BA/EIS for each agency. Although preferred alternatives have not yet been selected, informal consultation should be ongoing due to the aggressive time frame we are all tasked to meet.

It is important to keep in mind the following:

Although the FS is drafting the BA's for several EIS's, they are reliant upon input and feedback from the BLM on how to address particular concerns USFWS might raise on proposed implementation of GRSG conservation measures on BLM lands.

With limited engagement taking place, FWS has only the draft EIS to evaluate and have identified species that may be adversely affected. Only through engagement with the BLM can some of these issues be addressed, clarified and perhaps resolved. The BLM must speak for our land and management practices and be the driver of whatever modifications, if any, we will consider based on discussions with USFWS. The FS would then be available to capture those resolutions within the Biological Assessment, but they are not, nor should they be, tasked as the decision makers for BLM management.

I encourage you all to engage with your counterparts in FS and FWS on a routine basis. Please keep in mind that if formal consultation is necessary, the FWS are allotted the allowable 135 days to complete their Biological Opinion and such a situation will delay the current expectation of signing Records of Decision by December 15, 2014. Routine engagement among all agencies throughout the course of informal consultation and the drafting of the BAs will be advantageous and beneficial to all involved.

Thanks for your cooperation.  
Kim

Kim Tripp  
National Threatened and Endangered Species Program Lead, Acting  
Bureau of Land Management

Division of Fish and Wildlife  
20 M Street SE  
Washington, D.C. 20003  
Office: 202-912-7237  
Fax: 202-245-0028

----- Forwarded message -----

From: **Colt, Chris J -FS** <[ccolt@fs.fed.us](mailto:ccolt@fs.fed.us)>  
Date: Wed, Jul 2, 2014 at 8:17 PM  
Subject: GRSG: Contact list Sec 7 Consultation (BLM, FS, FWS points of contact by EIS)  
To: "Tripp, Kim ([KTripp@blm.gov](mailto:KTripp@blm.gov))" <[KTripp@blm.gov](mailto:KTripp@blm.gov)>, "Doug Laye ([doug\\_laye@fws.gov](mailto:doug_laye@fws.gov))" <[doug\\_laye@fws.gov](mailto:doug_laye@fws.gov)>  
Cc: "Munson, Johanna ([jmunson@blm.gov](mailto:jmunson@blm.gov))" <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, "Bridget Clayton ([bclayton@blm.gov](mailto:bclayton@blm.gov))" <[bclayton@blm.gov](mailto:bclayton@blm.gov)>, "Bahr, Quincy ([qfbahr@blm.gov](mailto:qfbahr@blm.gov))" <[qfbahr@blm.gov](mailto:qfbahr@blm.gov)>, "Brent Ralston ([bralston@blm.gov](mailto:bralston@blm.gov))" <[bralston@blm.gov](mailto:bralston@blm.gov)>, "jtague@blm.gov" <[jtague@blm.gov](mailto:jtague@blm.gov)>, "jsuther@blm.gov" <[jsuther@blm.gov](mailto:jsuther@blm.gov)>, "Mermejo, Lauren ([lmermejo@blm.gov](mailto:lmermejo@blm.gov))" <[lmermejo@blm.gov](mailto:lmermejo@blm.gov)>

Attached is a contact list of the BLM, FS and FWS points of contact for the greater sage-grouse Land Use Plan revisions and amendments.

Chris Colt

**Chris Colt**  
Wildlife Biologist  
USFS Sage-Grouse NEPA Support ID Team (NeST)  
[ccolt@fs.fed.us](mailto:ccolt@fs.fed.us)  
208-236-7506



Link: [FS Greater Sage-Grouse Website](#)

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May 15, 2015

John Beck, Project Lead  
Greater Sage-Grouse LUP Amendments  
Idaho and Southwestern Montana Sub-Region  
Bureau of Land Management, Idaho State Office  
1387 S. Vinnell Way  
Boise, Idaho 83709

Tel: (208) 373-4070

Sent via email: [jmbeck@blm.gov](mailto:jmbeck@blm.gov)

**Custer County Idaho Comments on Idaho and Southwestern Montana Greater Sage-Grouse Administrative Draft of Proposed Land Use Plan Amendment and Final Environmental Impact Statement**

On behalf of the Custer County Idaho Board of Commissioners, please incorporate the following comments into the above referenced documents. All prior Custer County comments to this NEPA process are herein incorporated by reference.

**1. FEIS Chapter 1, Page 2:** *“While historical Euro-American settlement of these lands has been slower and sparser than in other regions of the country, habitat conversion to suit human purposes has contributed to widespread loss and decline of sagebrush habitat availability or quality and associated wildlife populations. These human purposes include agriculture and urban development, energy and mineral resource development, and a long history of dispersed (but sometimes intensive) uses such as domestic grazing.”*

Comment:

The Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (FEIS) for Idaho and southwestern Montana are based on a series of false assumptions including the statement quoted above. As testimonials from Custer County Commissioners and residents show, before enactment of the ESA, sage-grouse were abundant. Sage-grouse populations thrived in the era of agriculture in Idaho and southwest Montana. This fact is understated in the FEIS in favor of hypothetical pre-European settlement “make-believe” maps that are not

based on science. The artificial stories and maps created by federal biologists leave out the fact that when ranchers, farmers and miners settled in Idaho and Montana in the 1800s and 1900s they cleared trees, leveled land, planted crops, created year round water sources and increased the abundance of sage-grouse and the diversity of habitat the sage-grouse needed for optimum year round survival.

The false assumptions throughout the FEIS result in a proposed action that would harm the Greater Sage-Grouse as well as the economy of Custer County and other counties in Idaho and southwestern Montana. The proposed action would also harm the economic well being of our nation as a whole by destroying the very industries that have helped sage-grouse habitat diversification over time. The proposed action would also harm our military defense system by adding restrictions that are unnecessary and expensive. Every hour and every dollar the military spend on this false crisis is time and money that is urgently needed to strengthen our national defenses.

The false assumptions and incorrect political rationalizations in the name of the Endangered Species Act (ESA) are disingenuous and need to be corrected. For the reasons listed below and those itemized in past comments, the Custer County Board of Commissions recommends the No Action Alternative as the preferred alternative.

**2. FEIS Page 1 -9. “Within the Idaho and southwestern Montana sub-region, the PACs consist of a total 11,232,800 acres.”**

Comment:

Custer County is opposed to restrictions within over 11.2 million acres of Priority Areas for Conservation (PACs) including each and every proposed land withdrawal, restriction on land disposal, leasing closure, leasing constraint, non-energy leasing closure, saleable mineral material leasing closure, travel management restriction, ban from surface occupancy, anthropomorphic surface disturbance limitation and other action that prohibits economic opportunities, scientific vegetative management, and predator control options outlined clearly and succinctly in the Custer County Land Use Plan.

**3. FEIS Figure 1-1**

Comment:

This figure demonstrates that the Greater sage-grouse habitat is widespread and abundant. The proposed action is based on the premise that sage-grouse are declining due to man induced factors related to livestock grazing, oil and gas development, roads, and mining.



Instead, the science shows the sage-grouse populations fluctuate in relation to climate and predators and that sage-grouse are not threatened with extinction. Genetic work by Dr. Zink, discussed in previous comments submitted by Custer County, clearly demonstrates the genetic health of the Greater sage-grouse population across the eleven states where listing is proposed but not warranted.

The very work federal land management agencies should be taking to enhance sage-grouse habitat would be severely restricted by the proposed alternative. The proposed plan of action would limit options to manage sagebrush and riparian communities as well as predators, thus harming sage-grouse populations in Idaho and southwestern Montana.

**4. FEIS Table 1-3 Lists Predators as a threat to sage-grouse in all three documents cited:**

<b>USFWS 2010 Finding</b>	<b>2006 Idaho GRSG Conservation Plan</b>	<b>2005 Montana GRSG Management Plan</b>
---------------------------	--	--

Comment

FEIS Table 1-3 clearly demonstrates that USFWS, Idaho and Montana all consider predators a significant threat to sage-grouse. This fact contradicts Appendix R, Page R 15 which states:

*“The [Catron] county plan identifies predation as the primary threat in the county (p. 14). This threat is not shown as a primary threat on other threat descriptions (BLM, State, USFWS, Local Working Group). **Predator control is not under the jurisdiction or authority of the BLM or FS** (emphasis added) and a specific alternative to address predator control has been eliminated from detailed analysis”*

The FEIS and Appendix R need to be corrected so they don't contradict each other.

Please answer the question of why BLM and FS personnel think they can manage game bird populations (sage-grouse) and their habitat and why they think they can't manage predator populations (foxes, badgers, ravens, etc) and their habitat.

Also, if *“**Predator control is not under the jurisdiction or authority of the BLM or FS**”* (emphasis added) why are the two agencies involved in interdisciplinary teams to manage wolves? Wolves are predators. Wolves prey on sage-grouse.

Stating that BLM and FS can manage sage-grouse and wolves, but not “predators” is illogical and contradicts ongoing actions by both agencies. The statement that predator control is not under the jurisdiction or authority of BLM or FS is false and needs to be corrected. Both agencies know that they currently, through agreements with state and other federal agencies, jointly perform predator management control activities. The statement was merely placed in



Appendix R to discard the Custer County recommendation for predator control actions as a mechanism to increase sage-grouse numbers. The statement is political and it is false.

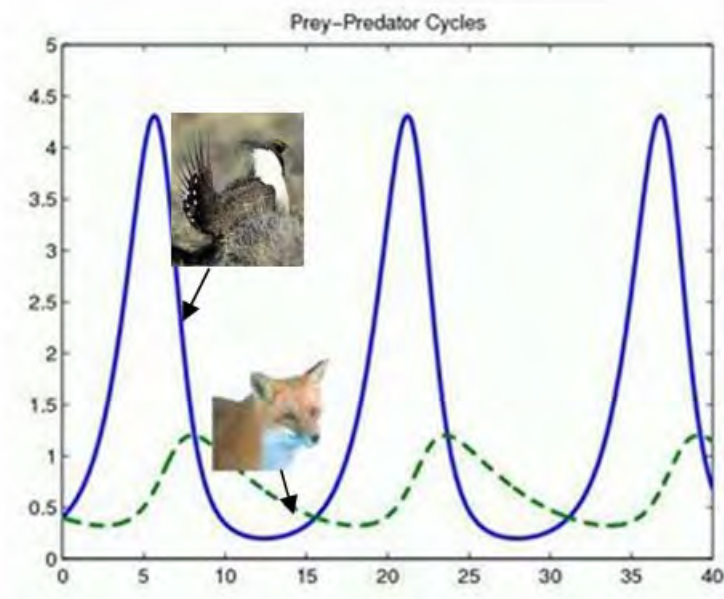
Please rewrite Appendix R as it relates to the Custer County Land Use Plan predator control recommendations and what BLM and FS can and cannot do through interagency agreements to control predators and to fund predator control programs when they so desire.

Why is it that BLM and Forest Service seem to think they can create rules and restrictions for sage-grouse and wolf habitat, hire biologists to count sage-grouse and wolves, radio track sage-grouse and wolves, map sage-grouse and wolf movements, etc. yet the same federal agencies say they can't count badgers, radio track badgers, map badger movements, or otherwise "manage" predators such as badgers?

What federal laws create the distinction between when the BLM and Forest Service can manage a particular species? BLM and Forest Service biologists are involved in programs to track deer and elk, yet these species are not listed as sensitive, threatened or endangered.

The FEIS needs to analyze predators as well a prey. The two are directly related and inseparable.

Anyone with basic wildlife management training knows that there is a predator – prey cycle:



Prior to enacting the ESA, predator control was a key factor in keeping sage-grouse numbers high. This is a well documented fact that recent agency biologists choose to ignore.

The presence or absence of predators is a key population factor in the survival and population viability of sage-grouse and cannot be categorically ignored. By ignoring the predator prey cycle in the FEIS, the agencies have missed a key factor in sage-grouse management that is critical to their decision. The lack of a detailed predator prey analysis negates the ability of the agencies to make an informed decision. The lack of a predator prey analysis makes the current FEIS proposed decision arbitrary and/or capricious.

## **5. FEIS Figure 3-3**

Comment:

This figure demonstrates that catastrophic fires are significant in Idaho and southwestern Montana. Science proves sage-grouse habitat is dynamic and vulnerable to catastrophic fires if left unmanaged (Davies et al 2011). The catastrophic fires that would be perpetuated by the proposed action will destroy soil microbes necessary to restore vegetation.

Livestock grazing prevents blazing, yet livestock grazing is severely restricted under the proposed action. The result of implementing the proposed action would be massive fuel loads that build up and burn hot, requiring federal, state and local resources to fight fires instead of producing food and economic prosperity.

## **6. FEIS Appendix D**

Comment:

Though the federal agencies assess fire strategies, they fail to include the private land and the value of partnerships with private landowners to create an ecosystem approach to fire management. Their analysis also fails to consider the large amount of revenue generated from mining, oil and gas, and livestock grazing that would be available to implement the fire management strategies if these resource uses were allowed to persist and thrive under Congressionally mandated multiple use guidelines.

The combination of natural resource use and mitigation provided when industry is involved in natural resource management, while at the same time creating wealth from food and energy producers, was not analyzed. Money matters. The Big Green organizations are not spending enough of their money on land management. Instead they spend it on litigation and lobbying. The litigation takes money away from federal land management agencies that would be better spent on managing wildlife habitat.



Natural resource users will spend money to manage the land so they can continue to use it wisely. Federal agencies should ally with livestock producers, mining companies, oil and gas companies, hunters and other natural resource users to find ways to work towards the goal of bringing both healthy natural resources and healthy economic metrics into balance. Government would be better served to work with producers instead of against them. The current plan of action works against industry.

The current plan of action did not take into account the comments provided by Custer County to date in regard to this NEPA decision. The proposed action is inconsistent with the Custer County Land Use Plan and the economic needs and willingness of the County and its constituents to work to assure the health of sage-grouse populations and their habitat.

## **7. FEIS Appendix R**

Comment:

Though Appendix R of the FEIS purports to take into account relevant County Land Use Plans, it does nothing to create consistency between federal and local plans. The Custer County Board of Commissioners adopted their Land Use Plan in hopes that it would be relevant to the decisions of federal land managers within the County. Instead, the Custer County Land Use Plan was largely ignored because it did not fit with the easier and less expensive government GIS models that lock up the land instead of managing land as evidenced by the millions of acres that would be withdrawn or restricted from multiple use under the proposed alternative.

## **8. Appendix AA**

Comment

The IMPLAN addressed in Appendix AA is deceiving in respect to tables that show no decrease in AUMs under the proposed action. The problem is that the price of the AUMs increases to the point that livestock producers will not be able to afford the AUMs (Appendix AA).

This real and significant economic impact was not analyzed in the FEIS, in direct violation of NEPA, CEQ regulations, the Regulatory Flexibility Act and a variety of other laws, policies and Executive Orders detailed in previous Custer County comments. Based on a lack of a proper economic analysis, any decision from the FEIS is by nature arbitrary and/or capricious.



The IMPLAN is akin to stating that the number of federal employees in BLM and Forest Service will stay the same, though in a different part of the analysis, their salaries will be cut 90%. Logic tells you the federal employees will leave if their salaries are significantly cut. Why wasn't the same logic used to state that AUMs will be significantly reduced under the proposed action alternative due to the significant increase in the cost of each AUM?

## 9. Appendix R

Comment:

The LUPA/FEIS continue to ignore the Custer County Land Use Plan as evidenced in Appendix R of the FEIS. Custer County Commissioners have watched as ESA actions to bring back species such as the spotted owl, gray wolf and grizzly bear have restricted perceived threats such as livestock grazing, timber harvest, oil and gas development, mining and other natural resource uses. The result is unhealthy and unbalanced. Custer County Commissioners reacted by writing their own land use plan that should become part of any federal plans within the County. Instead, the proposed action is inconsistent with the County Land Use Plan and the federal government is negligent in its actions to dismiss the County Plan as irrelevant.

The proposed action further restricts land uses and land management tools that constituents of Custer County need to utilize in order to keep sagebrush from becoming decadent. Old growth climax sagebrush is not used by sage-grouse, yet that is what the proposed action will create, to the detriment of the very species the federal agencies purport to want to protect.

How did federal agencies get off track? The answer is simple. Politics, emotions and egos are overtaking science and facts. Many federal biologists have put their careers on the line to get promoted, make friends in Washington DC and become Hollywood – type stars in the eyes of people who trust them to save a species that would be best left to local management.

Pro-sage-grouse organizations are making billions of dollars off this false crisis. Politicians are getting reelected based on the lobbying efforts of these Big Green organizations that know the real issue is not sage-grouse. The real issue is power and wealth, big government control and a wildlands network where rural populations are exterminated for the perceived greater good of the country.

The crime is in the fact that rural Americans that feed the world are the heart and soul of our country. They should not be destroyed in favor of zealots that believe humans are a parasite on this earth. By writing Appendix R in a way that dismissed the Custer County Land Use Plan, the federal agencies are buying into a false premise that will actually put the security of



our nation at risk as we become dependent on other nations for food, energy, minerals, and other necessities of life.

The ESA action to place Canadian timber wolves in Idaho and southwest Montana has created a significant increase in predators which in turn threatens sage-grouse. As documented in earlier Custer County comments, raven numbers have increased thousands of fold in certain areas of Idaho due to the carcasses left by wolves. Ravens and other predators eat sage-grouse eggs and sage-grouse chicks. Why is the fact that ravens and other predators are causing a decline in sage-grouse ignored? The answer has to be political because it certainly isn't scientific. Many members of the Custer County Commission have seen the benefits of predator control. Many of the people who live in Custer County grew up in the County. They know the history, customs and culture of their ancestors. They know wildlife management. They know more about sage-grouse and sage-grouse habitat than federal biologists. Custer County Commissioners know that the proposed action is bad for sage-grouse and bad for their County.

## **10. FEIS Appendix BB**

Comment:

The federal agencies do not see the hypocrisy of their thinking. In Appendix BB they discuss nonmarket values including *“value from using these non-market resources, such as photographing ranch houses, old barns ... driving backcountry roads.”* They don't stop to think that the proposed action will destroy the very values they weigh. The proposed action will cause ranch houses and old barns to crumble and high density subdivisions to be built (Davies et al. 2011). Backcountry roads will either disappear or become paved roads with more traffic. The nonmarket analysis is fatally flawed because it places values on so many resources that will disappear if the proposed action is implemented. The nonmarket analysis must be re-written to take into account this factor.

## **SUMMARY**

In summary, the only acceptable alternative is the No Action Alternative. Idaho and Montana fish and wildlife management agencies need to work with local governments and multiple use groups to keep a wide diversity of habitat, with vegetation in various seral stages, to recreate an ecosystem where sage-grouse and other wild animals thrive. Predator control must be part of the solution.

The western eleven states where Greater sage-grouse are found should not become part of a conservation system that creates protection akin to national parks or wilderness. Sage-grouse





thrive on agriculture and a diversity of land uses and seral stages of vegetation. Sage-grouse do not thrive in climax communities of old growth sagebrush with unpalatable vegetation. The proposed action will exacerbate a situation where a spark of lightening is enough to start a catastrophic fire that burns millions of acres of sage-grouse habitat where fuel loads are so high that the habitat is lost for decades to come.

The FEIS needs to be rewritten to analyze the impacts the proposed action will have as fires increase and add more carbon to the environment than what was analyzed in the FEIS. (See <http://www.lanl.gov/discover/news-release-archive/2013/July/07.09-wildfires-may-contribute-to-global-warming.php>).

Please choose the No Action Alternative and work with local and state governments to manage sage-grouse and their habitat in balance with all wildlife and human activities. To do otherwise will rapidly result in the demise of sage-grouse and their habitat.

Respectfully Submitted on Behalf of Custer County by  
Darling Geomatics Sage-Grouse Biologist

*/s/ Mary E. Darling*

Mary E. Darling, MS, JD



**Ralston, Brent E**

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**From:** Ralston, Brent E  
**Sent:** Tuesday, May 22, 2012 2:42 PM  
**To:** Jon Beals (Jon.Beals@osc.idaho.gov)  
**Subject:** Cooperating Agency Involvement for Idaho and southwestern Montana Sage-grouse EIS  
**Attachments:** GRSB MOU\_OSC\_052112.docx

Jon Beals,

The BLM appreciates your continued involvement for the Idaho and southwestern Montana portion of BLM's National Greater Sage-Grouse Planning Strategy.

To formalize that Cooperating Agency agreement, we have prepared a memorandum of understanding (MOU) for your review and approval which is attached to this email. This MOU replaces the MOU draft your office has previously reviewed. The MOU describes specific aspects of the agreement. In general Cooperating Agencies share skills and resources to help shape BLM land use plans and environmental analyses that better reflect the policies, needs, and conditions of their jurisdictions and the citizens they represent. Cooperating Agencies accept obligations to contribute staff time, develop and review analyses for which they have particular expertise, and fund their own participation. The MOU contains any specific details regarding that contribution, and primarily identifies collaboration through meetings and potential data sharing.

Given the large geographic scale of the project – covering southern Idaho and southwestern Montana – most coordination as a Cooperating Agency for this effort will be done in a virtual environment (i.e. via phone, conference calls and electronic mail) and hosted by the BLM.

We look forward to working with you throughout the development of this project. The next step is to formalize a Cooperating Agency relationship through approval of the MOU. To that end please review the attached MOU and approve through signature. Approval of this MOU specific to the National Greater Sage-Grouse Planning Strategy does not replace or supplant any other cooperation, coordination or collaboration agreements you may have with the BLM. Please send the signed and approved hard copy to:

Steve Ellis  
Idaho BLM State Director  
c/o Brent Ralston  
1387 S. Vinnell Way  
Boise, ID 83709

If you have any questions or concerns please contact Brent Ralston at (208) 373-3812 or [bralston@blm.gov](mailto:bralston@blm.gov). There is also information regarding Cooperating Agencies available online at: [http://www.blm.gov/wo/st/en/info/nepa/cooperating\\_agencies.html](http://www.blm.gov/wo/st/en/info/nepa/cooperating_agencies.html).

Upon your approval of the MOU, the Idaho BLM State Director will finalize the agreement through his signature and a copy will be provided to you for your records. We appreciate your continued interest in this project and look forward to working with you in the future.

Brent Ralston  
Sage-Grouse Project Lead  
Idaho and Southwestern Montana Subregion

Idaho State Office  
208-373-3812

# **MEMORANDUM OF UNDERSTANDING**

BETWEEN

IDAHO GOVERNOR'S OFFICE OF SPECIES CONSERVATION

AND

THE UNITED STATES DEPARTMENT OF THE INTERIOR

**BUREAU OF LAND MANAGEMENT**

*BY AND THROUGH THE IDAHO BLM STATE DIRECTOR – STEVEN A. ELLIS*

REGARDING

DEVELOPMENT OF THE RESOURCE MANAGEMENT PLAN  
AMENDMENTS AND

ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED

**GREATER SAGE-GROUSE NATIONAL PLANNING  
STRATEGY, IDAHO AND SOUTHWESTERN MONTANA  
SUB-REGION**

**Memorandum of Understanding  
Between the Idaho Governor's Office of Species Conservation  
and the Bureau of Land Management, Idaho State Office**

**Parties to and Purpose for this Document:** This Memorandum of Understanding (MOU) is entered into between the Idaho Governor's Office of Species Conservation and the United States Department of the Interior (DOI), Bureau of Land Management (BLM) by and through the Idaho BLM State Director, for the purpose of cooperating in conducting an environmental analysis and preparing the draft and final programmatic Environmental Impact Statement (EIS) for amendment of land use plans to incorporate conservation measures for the Greater sage-grouse. This unprecedented planning effort has been split into two regions: a Rocky Mountain Region and a Great Basin Region. The Rocky Mountain Region will conduct numerous EISs which include land use plans in the states of Colorado, Wyoming, North Dakota, South Dakota, and portions of eastern Utah and eastern Montana. The Great Basin Region will also conduct multiple EISs which include land use plans in California, Idaho, Nevada, Oregon, and portions of western Utah and western Montana.

The BLM is the lead agency assigned to complete the programmatic EISs, and the US Forest Service (FS) has joined the BLM as a Cooperating Agency to include FS lands into the programmatic EIS and amendment process. The FS will be amending their Land and Resource Management Plans (LMPS) under the same EISs that BLM will be amending their Resource Management Plans (RMPs) or Management Framework Plans (MFPs).

Within the Great Basin and Rocky Mountain Regions, sub-regional interdisciplinary teams (IDTs) will be developing the individual EISs. Based on the identified threats to the Greater sage-grouse and the US Fish and Wildlife Service (FWS) timeline for making a listing decision on this species, the BLM and the FS aim to incorporate objectives and conservation measures into land use plans by September 2014 in order to provide adequate regulatory mechanisms to conserve Greater sage-grouse and its habitat. These measures would be considered by FWS as it makes its final determination on whether to list the Greater sage-grouse under Section 4 of the Endangered Species Act (ESA). Therefore, these EISs will be prepared under expedited timeframes.

The Idaho and Southwest Montana Sub-regional effort, for which you requested to participate as a Cooperating Agency, will produce one state-wide programmatic EIS that will amend up to 22 BLM RMPs/MFPs, and 8 FS LMPS.

**1. Cooperating Agency:** This MOU establishes the Idaho Governor's Office of Species Conservation as a Cooperating Agency in the environmental impact analysis and documentation process and establishes procedures through which Idaho Governor's Office of Species Conservation and BLM will participate with the BLM (and/or the FS) to help develop the Idaho and southwest Montana Sub-region EIS. The Idaho Governor's Office of Species Conservation has been identified as a Cooperating Agency because it has jurisdiction by law and special expertise with respect to environmental impacts relating to the Greater sage-grouse National Planning Strategy (40 CFR 1508.5). This MOU applies specifically to the Idaho and southwestern Montana Sub-Region.

- 2. Authorities:** This MOU has been prepared under the authority of the National Environmental Policy Act (NEPA) of 1969, 42 U.S.C. 4321 et seq., and federal regulations codified at 40 Code of Federal Regulations (CFR) Part 1500-1508, and 43 CFR Part 46; the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq., and BLM's planning regulations (in particular 43 CFR 1601.0-5, 1610.3-1, and 1610.4).
- 3. Background:** In March 2010, the FWS published its listing decision for the Greater sage-grouse indicating that listing was "Warranted but Precluded" due to higher listing priorities under the ESA. The inadequacy of regulatory mechanisms to conserve the Greater sage-grouse and its habitat was identified as a significant threat in the FWS finding on the petition to list the Greater sage-grouse as a threatened or endangered species. In view of the identified threats to the Greater sage-grouse, and the FWS timeline for making a listing decision on this species, the BLM and the FS propose to incorporate consistent conservation measures for the protection of Greater sage-grouse and its habitat into relevant BLM RMPs/MFPs and FS LMPs by September 2014 in order to provide adequate regulatory mechanisms to conserve Greater sage-grouse and its habitat. The BLM and the FS will consider and analyze these conservation measures through the plan amendment processes of the respective agencies. The BLM and the FS expect to prepare EISs to analyze proposed amendments to land use plans that are not currently undergoing amendment or revision. For plans already undergoing amendment or revision, the BLM and the FS will consider incorporating conservation measures through the ongoing amendment or revision processes.

The BLM and the FS intend to evaluate the adequacy of Greater sage-grouse conservation measures in existing BLM RMPs/MFPs and selected FS LMPs, and consider conservation measures, as appropriate, in proposed RMP/MFP and selected LMP amendments throughout the range of the Greater sage-grouse, with the exception of the bi-state population in California and Nevada and the Washington State distinct population segment, which will be addressed through other planning efforts.

The BLM and the FS have sought public and agency input to identify issues to address in the EISs, and the BLM and the FS will coordinate, as appropriate, with other federal, state, and local government agencies in preparing the EISs. The BLM and the FS will conduct detailed environmental studies of proposed conservation measures to be incorporated into RMPs/MFPs and LMPs and alternative conservation measures, and analyze how incorporation of these conservation measures into RMPs/MFPs and LMPs may affect the quality of the environment.

The BLM will serve as the lead agency and the FWS and the FS are Cooperating Agencies for these EISs. Cooperating Agency status may be offered to other federal agencies, tribes and local government agencies as the BLM deems appropriate.

All EISs will consider both federal and non-federal lands in its analyses. However, implementation of any decisions that amend RMPs/MFPs and LMPs would apply ONLY to federal land and minerals.

**4. Term of MOU:** This MOU will commence upon the date of the last signature made by the duly authorized representatives of the parties to this MOU, and will remain in full force and effect for the duration of the project, not to exceed five years, or until terminated, as described in item 9i below.

**5. Responsibilities of the Idaho Governor's Office of Species Conservation:** In agreement with the time frames identified in Attachment A for this planning effort, the Idaho Governor's Office of Species Conservation will participate in the environmental analysis and documentation process where appropriate given the agency's jurisdiction and special expertise. The schedule and preliminary timeframe for the respective stages of EIS development is included in Attachment A.

The Idaho Governor's Office of Species Conservation will have the opportunity to provide review and input on draft documents prepared during the EIS process prior to public release of those materials. The IDT leader may, at any time during the effective term of this MOU, request records and/or information by contacting the Idaho Governor's Office of Species Conservation point of contact identified in Section 9k below.

**6. Responsibilities of the BLM:** In accordance with 40 CFR 1501.5, the BLM is the lead agency. The point of contact for the preparation of this EIS is as designated in Section 9k of this MOU. The BLM will keep the Idaho Governor's Office of Species Conservation representative apprised of current events and timeframes in relation to this EIS. The BLM will consider and may use Idaho Governor's Office of Species Conservation input and proposals to the maximum extent possible and consistent with responsibilities as lead agency as described in 40 CFR 1501.5. BLM may incorporate information provided by Idaho Governor's Office of Species Conservation into the draft and final EIS, as appropriate and deemed relevant to the planning process. The BLM and FS are solely responsible for any decisions made for the planning effort. Any BLM decisions made associated with the EIS apply only to BLM-administered lands and federal mineral estate. Any FS decisions made associated with the EIS would apply only to FS land, upon adoption of the EIS under 40 CFR 1506.3.

**7. Mutual Responsibilities of the Parties:** The Idaho Governor's Office of Species Conservation and the BLM agree to cooperate by informing each other as far in advance as possible, of any related actions, issues or procedural problems that may affect the environmental analysis and documentation process or that may affect either party. The parties agree to cooperate in the development and review of any operating guidelines or agreements between the Idaho Governor's Office of Species Conservation or BLM and other agencies involved in the EIS that may affect the environmental analyses and writing of the EIS.

Responsible parties identified in 9k serve as the MOU primary points of contact. The purpose of these points of contact is to ensure that timely and coordinated communication and exchange of information between the parties to the MOU occurs throughout the planning process.

**8. Payment:** No payment will be made to either party by the other as a result of this MOU. Each party is responsible for the costs of their participation. During the term of this MOU, should it become necessary for one party to purchase from or make payment or reimbursement to the other party, such arrangements will be covered in a separate cooperative agreement.

**9. General Provisions:**

**a. Amendments.** Either party may request changes to this MOU. Any changes, modifications, revisions, or amendments to this MOU, that are mutually agreed upon by and between the parties to this MOU, will be incorporated by written instrument, executed and signed by both parties to this MOU, and are effective in accordance with the authorities defined herein.

**b. Applicable Law.** The construction, interpretation and enforcement of this MOU will be governed by the applicable laws of the United States.

**c. Entirety of Agreement.** This MOU, consisting of 8 pages, represents the entire and integrated agreement between the parties and supersedes all prior negotiations, representations and agreements concerning the parties' environmental documents, whether written or oral.

**d. Severability.** Should any portion of this MOU be determined to be illegal or unenforceable, the remainder of the MOU will continue in full force and effect, and either party may renegotiate the terms affected by the severance.

**e. Sovereign Immunity.** The Idaho Governor's Office of Species Conservation and the BLM do not waive their sovereign immunity by entering into this MOU, and each fully retains all immunities and defenses provided by law with respect to any action based on or occurring as a result of this MOU.

**f. Third Party Beneficiary Rights.** The parties do not intend to create in any other individual or entity the status of third party beneficiary, and this MOU must not be construed so as to create such status. The rights, duties and obligations contained in this MOU will operate only between the parties to this MOU, and will benefit only the parties to this MOU. The provisions of this MOU are intended only to assist the parties in determining and performing their obligations under this MOU. The parties to this MOU intend and expressly agree that only parties signatory to this MOU will have any legal or equitable right to seek to enforce this MOU, to seek any remedy arising out of a party's performance or failure to perform any term or condition of this MOU, or to bring an action for the breach of this MOU.

**g. Exchange of Information/Confidentiality.** All records or information requested of either party by the other will be reviewed by the releasing party prior to release. To the extent permissible under law, any recipient of proprietary and/or pre-decisional information agrees not to disclose, transmit, or otherwise divulge this information without prior approval from the releasing party. Any breach of this provision may result in termination of this MOU. The BLM and the Idaho Governor's Office of Species Conservation recognize that applicable



public records laws will require release of non-exempt documents.

**h. Administrative Considerations.** Pursuant to 204(b) of the Unfunded Mandates Reform Act of 1995, responsible Federal Agency officials may meet or enter into project level MOUs with officials of State, Tribal and local Governments or their designees. During such meetings and development, implementation and monitoring of such MOUs, views, information and advice are exchanged, or input relative to the implementation of Federal programs is obtained. Such meetings and MOUs will further the administration of intergovernmental coordination.

The meetings or MOUs referred to include, but are not limited to, meetings called for the purpose of exchanging views, information, advice or recommendations, or for facilitating any other interaction relating to intergovernmental responsibilities or administration.

Nothing in this MOU will be construed as limiting or affecting in any way the authority or legal responsibility of the Idaho Governor's Office of Species Conservation or the BLM, or as binding either the Idaho Governor's Office of Species Conservation or the BLM to perform beyond the respective authority of each, or to require either to assume or expend any sum in excess of appropriations available. It is understood that all the provisions herein must be within financial, legal, and personnel limitations, as determined practical by the Idaho Governor's Office of Species Conservation and the BLM for their respective responsibilities. This MOU is neither a fiscal nor a funds obligation document.

Nothing in this MOU will be construed to extend jurisdiction or decision-making authority to BLM for planning and management of land and resource uses for any non-BLM administered lands or resources in the planning area. Similarly, nothing in this MOU will be construed to extend jurisdiction or decision-making authority to the Idaho Governor's Office of Species Conservation for planning and management of land or resource uses on the Federal lands or mineral estates administered by the BLM. Both the Idaho Governor's Office of Species Conservation and BLM will work together cooperatively and will communicate about issues of mutual concern.

Nothing in this MOU may be construed to obligate the Department of the Interior, the BLM, or the United States to any current or future expenditure of resources in advance of the availability of appropriations from Congress.

No member of or delegate to Congress shall be entitled to any share or part of this MOU, or to any benefit that may arise from it.

**i. Termination:** Either party may terminate this MOU upon 30 days written notice to the other party of their intention to do so. During the 30-day period, the parties will conduct negotiations to resolve any disagreement(s). If the disagreement(s), if any, have not been resolved and the party initiating the termination has not rescinded its termination in writing by the end of the 30-day period, the MOU will terminate. In the event negotiations are progressing but are not concluded by the end of the 30-day period, the party initiating the termination notice may request in writing that termination be postponed for an additional 30-

day period or longer while the negotiations continue; upon such request, the termination shall be postponed for the specified period.

**j. Dispute Resolution:** In the event of any disagreement between the parties regarding their obligations under this MOU that cannot be resolved between the parties in a reasonable time, either party may refer the disagreement to the Idaho BLM State Director Steven A. Ellis to timely resolve said issue. The decision of the Idaho BLM State Director Steven A. Ellis will be the final decision for purposes of resolving the issue.

**k. Contacts:** The primary points of contact for carrying out the provisions of this MOU are:

**COOPERATOR**

John Beals  
Idaho Governor’s Office of Species Conservation  
304 N. 8th Street, Room 149  
Boise, ID 83702

**BLM**

Jeff Foss  
Deputy State Director, Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-3800

**10. Signature:** The parties hereto have executed this Memorandum of Understanding as of the dates shown below.

The effective date of this MOU is the latest signature date affixed to this page. This MOU may be executed in multiple originals or counterparts. A complete original of this MOU shall be maintained in the records of each of the parties.

Idaho Governor’s Office of Species Conservation by and through:

\_\_\_\_\_  
John Beals  
Idaho Governor’s Office of Species Conservation

\_\_\_\_\_  
Date

U. S. DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, by and through:

\_\_\_\_\_  
Steven A. Ellis  
Idaho State Director

\_\_\_\_\_  
Date

## Attachment A

### Current EIS and Planning schedule, as of MOU signature:

<b>RMP/EIS Stage</b>	<b>Proposed Completion Date</b>
Conduct scoping and identify issues	May 15, 2012
Formulate alternatives	July 15, 2012
Estimate effects of alternatives	September 30, 2012
Select the preferred alternative; issue Draft RMP/EIS	December 31, 2012
Respond to comments	June 15, 2013
Issue Proposed RMP/FEIS	December 1, 2013
Governor's Consistency Review	January 31, 2014
Resolve protests; modify Proposed RMP/FEIS if needed;	April 15, 2014
Sign ROD	September 30, 2014 (latest date acceptable)

March 12, 2015

The Honorable Sally Jewell  
Secretary  
U.S. Department of the Interior  
1849 C. Street NW  
Washington, D.C. 20240

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue NW  
Washington, D.C. 20250

Dear Secretaries Jewell and Vilsack:

You are aware the Bureau of Land Management (BLM) and U.S. Forest Service (USFS) are engaged in an unprecedented planning effort to conserve greater sage-grouse and its habitat, which requires strong leadership embracing the best available science to develop and implement adequate conservation measures needed to foreclose protecting greater sage-grouse under the Endangered Species Act (ESA). We strongly encourage you to direct federal planners to finalize conservation plans that prescribe objective, measurable and robust conservation measures based on the best available science across the species' range, as discussed below.

Federal agencies organized a National Technical Team (NTT) in 2011 to review the best available science and make recommendations for conserving greater sage-grouse. Many scientists and biologists described this report as a "comprehensive compilation of the scientific knowledge needed for conserving Sage-Grouse" that "offers the best scientifically supportable approach to reduce the need to list Sage-Grouse as a Threatened or Endangered species." Letter from Michael Soulé, Ph.D. and Clait Braun, Ph.D. *et al.* to the Honorable Ken Salazar, January 13, 2013, p. 1. Indeed, many portions of the NTT Report provide a scientific baseline for managing greater sage-grouse habitat using consistent, measurable conservation standards. However, other parts of the report contained questionable statements that are not supported by the best available science. For example, the report contains the assertion that "Prescribed fire... can assist in the recovery of sagebrush habitat in some vegetation types...." This statement ignores a large body of evidence showing just the opposite. Thus, conservation measures embraced by the current BLM/USFS planning effort must be tightened to account for more robust scientific evidence.

We are concerned that federal agencies appear to be abandoning science-based conservation measures reflected in the published scientific literature as well as in the NTT Report in favor of more elastic, subjective measures identified in the U.S. Fish and Wildlife Service's Conservation Objectives Team Report (COT Report). The COT Report adequately identifies the threats to sage-grouse populations, but it does not include adequate conservation measures to address these threats. This report was largely a review of previously published information. It also introduced ambiguous concepts (representation, redundancy, and resilience) to guide conservation actions. Unfortunately, these parameters are not measured by state wildlife agencies when assessing sage-grouse populations (in fact, no information was provided on how to measure them or even if they could be adequately measured), and their use may further confuse the issue. Thus, the COT Report cannot reasonably serve as either a guide or gauge for planning and assessing the adequacy of federal sage-grouse conservation plans.

We are particularly concerned that federal agencies are failing to adhere to the following conservation measures in the NTT Report:

- **Mining and Minerals Management**: Closing and recommending for immediate withdrawal lands from leasing or sale (including coal) under federal mineral laws for the maximum period allowed under law (NTT 2011: 22, 24-25, 26). Where fluid minerals development is already permitted, require conditions of approval for existing fluid minerals leases to include a 4-mile no-surface-occupancy lek buffer to protect Sage-grouse breeding, nesting and brood-rearing habitat (NTT 2011: 22-24). Sage-grouse concentrate their habitat use within 4-6 miles of leks during breeding and nesting (NTT 2011: 21, Table 1; Coates et al. 2014), and the presence of oil and gas wells within 1.9-4 miles of leks causes reductions of breeding populations (Holloran 2005, Walker et al. 2007; Manier et al. 2014).
- **Disturbance Footprint**: Limiting discrete anthropogenic surface disturbance to less than 3 percent per section in priority habitat (NTT 2011: 7-8; Knick et al. 2013: 9, Fig. C; Baruch-Mordo et al. 2013: 237, Fig. B.), and restricting development to one site per section in priority habitat (NTT 2011: 21, 24; Holloran 2005; Doherty 2008; Doherty et al. 2010). Sage-grouse are sensitive to habitat disturbance; the best available science recommends capping disturbance (including existing disturbance) at less than 3 percent per section to maintain sage-grouse populations (NTT 2011: 7).

Moreover, additional scientific evidence suggests that the conservation measures for livestock grazing, land treatments, vegetation projects and fire in the NTT Report must be revised and strengthened, including in the following ways:

- **Livestock Grazing**: Requiring grazing strategies to maintain a minimum average grass height in sage-grouse nesting and early brood-rearing habitat (Connelly et al. 2000; *see also* Braun et al. 2005; Hagen et al. 2007; Rebholz 2007; Herman-Brunson et al. 2009; Taylor et al. 2010; Kaczor et al. 2011; Doherty et al. 2014). Tall, dense, vegetation appears to provide scent, visual, and physical barriers to predation on nesting sage-grouse hens, sage-grouse nests and chicks, and may enhance nest success (Gregg et al. 1994; Herman-Brunson et al. 2009).
- **Vegetation Treatments**: Prohibiting all sagebrush control projects in sage-grouse breeding and winter habitat (Beck et al. 2012; Connelly 2014). The acting BLM Director issued an Instruction Memorandum (IM) in 2013 that established actions for fire operations and fuels management related to sage-grouse conservation. This IM directed field offices to plan and implement fuel breaks and vegetation treatments. The IM did not provide guidance on relative size of treatments or timing with respect to sage-grouse breeding activities. Although the IM acknowledged that treatments may fragment habitats, it did not indicate that they can increase invasive species, enhance access into remote sagebrush steppe, and (with respect to roads) result in more wildfire (Miller et al. 2011). Moreover, the IM included lists of “best management practices” emphasizing sagebrush treatments. Clearly this IM and other similar guidance should be substantially revised to reflect appropriate, science-based actions.

- **Prescribed Fire:** No prescribed fire should be allowed in sage-grouse nesting, early brood rearing or winter habitat. Beck et al. (2012) provided compelling evidence that these kinds of treatments have few or no positive effects on sage-grouse; the evidence is clear that prescribed burning in sage-grouse nest habitat harms sage-grouse populations (Connelly et al. 2000; Beck et al. 2012).

The proposed alternatives in draft BLM resource management plans and sub-regional environmental impact statements (as well as the one final plan available – for the Lander Field Office) fail to adopt all of these prescriptions, and, instead, identify a series of measures that side-step these objective, measurable conservation protections. For example, in the Lander RMP, BLM uses a so-called Disturbance Density Calculation Tool (DDCT), which will allow greater surface disturbance than the science supports. These plans also fail to adhere to the current science on vegetation treatments and prescribed fires in important sage-grouse habitat, as discussed above. This must be fixed in all final BLM RMPs if there is any reasonable hope to avoid an ESA listing.

We support the federal planning process and are prepared to assist your Departments in developing measures to conserve and recover greater sage-grouse, but federal planners must commit to science-based planning to achieve this goal. Adhering to the COT Report will not accomplish this goal. Please let us know if we can assist in any way, and we can provide a complete list of all references cited upon request.

Sincerely,

William L. Baker, Ph.D., Laramie, Wyoming

Jeffrey L. Beck, Ph.D., Laramie, Wyoming

Clait E. Braun, Ph.D., Tucson, Arizona

John W. Connelly, Ph.D., Blackfoot, Idaho

Lester D. Flake, Ph.D., Springville, Utah

Edward O. Garton, Ph.D., Moscow, Idaho

Robert Gibson, Ph.D., Lincoln, Nebraska

Matthew J. Holloran, Ph.D., Fort Collins, Colorado

Kent C. Jensen, Ph.D., Volga, South Dakota

Kerry P. Reese, Ph.D., Moscow, Idaho

E. Thomas Rinkes, Boise, Idaho

cc: Brian Deese, Ass't to the President and Senior Advisor, White House  
Dan Utech, Special Ass't to the President, White House  
Christy Goldfuss, Senior Advisor, Council on Env'tl. Quality  
Jay Jensen, Assoc. Dir. for Land and Water Ecosystems, Council on Env'tl. Quality  
Robert Bonnie, Under Sec'y for Nat. Res. and Envir., U.S. Dep't of Agric.  
Sarah Greenberger, Counselor to the Sec'y of the Dep't of Interior (DOI)  
Janice Schneider, Ass't Sec'y for Land and Minerals Mgmt., DOI  
Michael Bean, Principal Deputy Ass't Sec'y for Fish, Wildlife and Parks, DOI  
Jim Lyons, Deputy Ass't Sec'y for Land and Minerals, DOI  
Neil Kornze, Dir., Bureau of Land Mgmt.  
Dan Ashe, Dir., U.S. Fish and Wildlife Serv.  
Tom Tidwell, Chief, U.S. Forest Serv., U.S. Dep't of Agric.  
Robert Dreher, Assoc. Dir., U.S. Fish and Wildlife Serv.  
Leslie Weldon, Deputy Chief, U.S. Forest Serv., U.S. Dep't of Agric.



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



In Reply Refer To:  
1610 (ID910)

Dear:

The Bureau of Land Management (BLM) would like to apologize for the letter dated June \_\_, 2014, that you received regarding the administrative draft proposed plan (ADPP) for the Idaho and Southwestern Montana Greater Sage-Grouse Land Use Plan Amendment (LUPA). Regretfully, BLM must issue an official retraction of the letter; it was intended only for cooperating agencies that have signed an official Memorandum of Understanding (MOU) with BLM, however it was mistakenly sent to an incorrect mailing list. Per the Code of Federal Regulations, a cooperating agency is defined as an eligible governmental entity that has entered into a written agreement (MOU) with the BLM establishing cooperating agency status in the planning and NEPA processes (43 CFR 1601.0-5 BLM).

Commented [GJD1]: KATHY, DO YOU KNOW WHAT DATE THEY WERE SENT OUT? ☺

This planning strategy illustrates the BLM's continued commitment to long-term, range-wide Greater Sage-Grouse conservation and acknowledges the added value of engaging all stakeholders and governmental partners in cooperative conservation efforts. At this time, official cooperating agencies are reviewing the Administrative Draft Proposed Plan for a two week period. After their review, BLM and the U.S. Forest Service (USFS) will analyze cooperating agency comments, incorporate any relevant additions or changes to the plan, and then we expect to publish the Proposed Plan/Final Environmental Impact Statement (FEIS) in fall of 2014. Once the document is published, a 30 day protest period will begin.

After the 30 day protest period ends, BLM and the USFS will analyze and respond to any appropriate protest issues, incorporate any relevant and necessary changes to the FEIS, and release a Record of Decision (ROD) with the final proposed land use plan amendments. Once the ROD has been signed, the U.S. Fish and Wildlife Service will review the BLM and USFS's proposed land use plan amendments. Because of a court-ordered settlement, the FWS has until 2015 to make a final determination on listing the Greater Sage-Grouse under the Endangered Species Act.

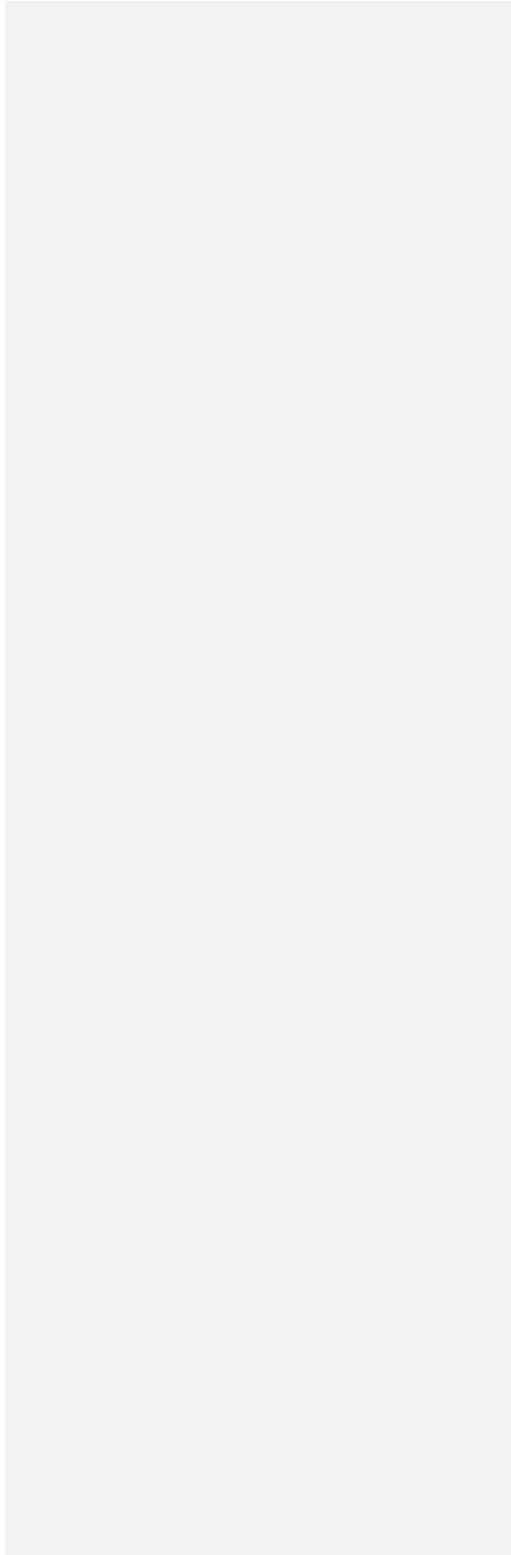
Again, we apologize for mistakenly sending the letter to you and truly regret any misperception this may have caused. If you have any questions, contact Brent Ralston (BLM Idaho) at (208) 373-3812 or Rob Mickelsen (USFS) at (208) 557-5764. Thank you in advance for your review and input throughout this planning process.

Sincerely,

Timothy M. Murphy



Acting Idaho State Director  
Bureau of Land Management



**Brent Ralston**

---

**From:** dbalsecr@gmail.com  
**Sent:** Tuesday, July 22, 2014 10:21 AM  
**To:** Ralston Brent  
**Cc:** Balfour Doug  
**Subject:** Administrative Draft  
**Attachments:** 20140722101830748.pdf

IDMT\_PUB\_9800  
3.3

PLEASE SEE ATTACHED.....

Thank you,  
Lisa Rodriguez  
Secretary to Douglas J. Balfour  
(208) 233-0680  
(208) 233-0319 (fax)

This communication, including any attachment, contains information that may be confidential and/or privileged, and is intended solely for the entity or individual to whom it is addressed. If you are not the intended recipient, you should delete this message and are hereby notified that any disclosure, copying, or distribution of this message is strictly prohibited. If you receive this email in error, please contact the sender immediately either by return email or at #(208) 233-0680.

# Memorandum

To: Brent Ralston  
From: Douglas J. Balfour ✓  
Date: July 28, 2014  
RE: Sage Grouse EIS

---

Brent,

I called last week to discuss this with you. I did not receive the EIS, and still have not received the CDs. I know we had the same problem previously, that you sent the EIS to the Power County Courthouse instead of to my office.

I am confused by the table on pages two (2) and three (3).

Under Alternative E, which was largely adopted, important habitat “contemplated greater management flexibility than” then core habitat. However it looks as if according to page two (2), for high voltage transmission, the standards are the same between core and important.

What I wanted to discuss with you is exactly what the EIS would do with Power and Cassia County’s proposal to authorize segments five (5) and seven (7) of the Gateway West Transmission Line.

Does avoidance “LR-1”, in important habitat, mean that transmission lines are not allowed, are allowed with restrictions and mitigation, or what?

In looking at Figure 2-23 from Volume one (1) of the Draft EIS, it does not appear that segments five (5) or seven (7) would cross any important or core habitat. Is that the case under the new EIS?

The new EIS appears to talk about a buffer zone of six hundred meters from transmission lines to lecs, apparently based upon a study by Connelly in 2000. Am I reading that correctly.

We are very aware that there is no scientific evidence that transmission lines interfere with Sage Grouse, in the slightest. As the EIS implies, if all infrastructure is placed on private property then public Sage Grouse will not be impacted. We submit that this is a non sequitur, grouse do not exist solely on public land.

Please review this and give me a call.

Doug

## Brent Ralston

---

**From:** kmondor@blm.gov on behalf of Murphy, Timothy  
**Sent:** Monday, July 28, 2014 1:51 PM  
**To:** Brent Ralston  
**Subject:** Fwd: Camas County Rangeland Management Plan  
**Attachments:** Camas County Rangeland Mgmt. Plan - 2014.doc

IDMT\_PUB\_9802  
3.3

## Per your request

----- Forwarded message -----

From: **Brenda Moyer** <[camasscd@yahoo.com](mailto:camasscd@yahoo.com)>  
Date: Wed, Jul 23, 2014 at 10:42 AM  
Subject: Camas County Rangeland Management Plan  
To: "[bralson@blm.gov](mailto:bralson@blm.gov)" <[bralson@blm.gov](mailto:bralson@blm.gov)>, Tim Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Dustin Miller <[dustin.miller@osc.idaho.gov](mailto:dustin.miller@osc.idaho.gov)>, Terry McRoberts <[terry.mcroberts@osc.idaho.gov](mailto:terry.mcroberts@osc.idaho.gov)>

Good Morning Everyone!

Attached is the Camas County Rangeland Management Plan for your review. A letter is being mailed via snail mail in regards to this Plan. The Plan itself is being sent electronically to save on postage and eliminate cumbersome paperwork. If you should have any questions, please contact us at one of the methods listed below.

Thank you.

Brenda

Brenda Moyer - District Administrator  
Camas Conservation District  
(208)764-3223  
P.O. Box 156  
Fairfield, ID 83327

[camasscd@yahoo.com](mailto:camasscd@yahoo.com)

"Do what you can, with what you have, where you are." Theodore Roosevelt

--

Timothy M Murphy  
acting Idaho State Director  
(Assistant Director  
Bureau of Land Management

Fire and Aviation Directorate  
National Interagency Fire Center)  
Boise, Idaho 83713  
(o) 208.373.4001  
(m) 208.850.5270

# **Camas County Rangeland Management Plan**

**Prepared by the Camas Conservation District**

**March 15, 2014**

Camas Conservation District  
P.O. Box 156  
Fairfield, Idaho 83327  
208-764-3223 phone  
Camasscd@yahoo.com

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Camas Conservation District  
P.O. Box 156  
Fairfield, Idaho 83327  
208-764-3223 phone  
Camasscd@yahoo.com

Resolution # 1104

CAMAS COUNTY  
Recorded for:  
COUNTY BOARD OF COMMISSIONERS  
2:35:27 pm 07-14-2014  
**2014-086027**  
No. Record Fee: \$  
KORRI BLODGETT  
County Clerk  
Deputy: BWALTON

RESOLUTION ADOPTING THE CAMAS COUNTY  
RANGELAND MANAGEMENT PLAN

State of Idaho  
County of Camas

At a meeting of the Board of County Commissioners (BOCC) for Camas County, Idaho, held at the Commissioner's Meeting Room, Camas County Court House annex in Camas, Idaho June 22, 2014, there were present:

Chairman, Ken Backstrom, Commissioner Barb McMurdo, Commissioner Janet Croner, and Clerk Korri Blodgett when the following proceedings were discussed and voted on, to-wit:

RESOLUTION NO. 1104

A RESOLUTION APPROVING THE CAMAS COUNTY GREATER SAGE-GROUSE  
CONSERVATION PLAN

Recitals

- A. In 1997, the State of Idaho provided a management framework for the Greater Sage-Grouse (sage grouse) in Idaho calling for local working groups. The North Magic Valley Sage-Grouse Local Working Group (NMVSGLWG) was formed to provide local management strategies for Gooding, Camas, Lincoln and Blaine Counties. The Camas Conservation District prepared the Camas Sage Grouse Conservation Plan that was adopted in April, 2014.
- B. The State of Idaho released a plan in 2006, and later modified this and requested that it be considered as an alternative to the National Greater Sage-Grouse Land Use Planning Strategy of the U.S. Bureau of Land Management (BLM) and U.S. Forest Service (USFS). The State's Sage-Grouse Alternative was prepared for the purpose of providing "special management for sage-grouse on lands managed by the BLM and USFS." The State also maintains that with this management framework in place, the State will approach local governments to see what actions are taking place locally that are necessary and appropriate to complement, and be, included in the State's Federal Alternative.
- C. Camas Conservation District and Camas County Board of Commissioners wish to provide said guidance to the State of Idaho and the BLM, by adopting the Camas County Rangeland Management Plan (Plan), defining the policies and practices that have been effectively utilized and implemented locally to manage the Sage-Grouse.



- D. The Plan is designed to reflect the unique characteristics of the habitat in Camas County and to acknowledge and support current management practices that have kept the sage grouse and its habitat in Camas County healthy and viable.
- E. The U.S. Fish and Wildlife Service (the Service) listed the Sage-grouse as a Candidate species (warranted, but precluded) for endangered status in 2010, with a pending decision for a final determination anticipated in September, 2015.
- F. Camas County intends to develop a Memorandum of Understanding (MOU) with the Bureau of Land Management and to participate as a Cooperating Agency in the review of the Greater Sage-Grouse.
- G. In addition, Camas County will adopt by Resolution the local government position asserting its coordination authority with regard to all federal and state agencies maintaining jurisdiction over lands and/or resources located within Camas County, Idaho. As a result, Camas County has requested the BLM, through the Coordination process, to reconcile their planning efforts with local planning efforts in Camas County.
- H. At the direction of the U.S. Department of Interior, a National Technical Team (NTT) was assembled which produced a set of conservation strategies known as the NTT Report in December, 2011. While the NTT Report used the Wyoming region as the basis for the national habitat range characteristics and subsequent land use management recommendations, it does not address the unique landscape qualities, habitat characteristics or land uses found in Camas County.
- I. The sage grouse population has remained the same or increased steadily making the Camas County population of sage grouse one of the most stable in Idaho.
- J. The State of Idaho continues to allow hunting Sage Grouse. The hunting season is open September 15 through September 21 allowing one-bird daily limits with two in possession. Hunting remains a viable industry in Camas County, and the sage-grouse population has remained stable as well.
- K. The BLM has a statutory duty to manage lands under their direct or indirect jurisdiction for multiple uses of resources, and not for a single purpose. The implementation of the NTT recommendations across large areas of Camas County through an amendment to the applicable Resource Management Plans would burden large areas of private lands that are either not under their jurisdiction or are not suitable sage grouse habitats with severe land use restrictions.
- L. Camas County remains concerned that if the NTT recommendations are adopted across all currently proposed Preliminary Priority Habitat, Preliminary General Habitat, and Linkage Areas as mapped without regard, for local conditions and using inaccurate data, large swaths of non-habitat on public and private lands in the County would be encumbered and burdened with unnecessary regulations that would significantly hurt local economies and misallocate resources which would not help recover the species.

M. Camas County's primary source of revenue that supports the operations and welfare of the County and its citizens comes directly and indirectly from the ranching, farming, recreation, and resource industries. Camas County's ability to protect the health, safety and welfare of its citizens, as well as, ensure continued protection for all wildlife and their habitats, and the productive uses of land within the County depends on the continuation of balanced development and management of agriculture, and recreation interests.

N. The CCD held a public meeting on Tuesday, June 11, 2013 to discuss and consider the Plan.

O. Based on substantial and competent discussion and input at the aforementioned public meeting, the BOCC has made the following determination:

1. That proper public notice was provided for the meeting before the Board of County Commissioners.
2. The public meeting before the Board of Commissioners was extensive and a majority of members of the Natural Resource Advisory Committee were present with all pertinent matters, issues and facts thoroughly discussed and submitted, and all in attendance were heard at the meeting.
3. For the above stated and other reasons, the Plan is in the best interest of the health, safety, and welfare of the citizens of Camas County.
4. That the Plan is in general conformance with the Camas County Comprehensive Plan.
5. Camas County has the explicit authority to plan for land use in the county.
6. The Board of County Commissioners, pursuant to 43 U.S.C. §17127 has formally enacted Coordination via Resolution with agencies acknowledging that federal law requires the BLM to (1) make its plans consistent with the Plan and related policies; (2) include this plan as an alternative pursuant to 43 U.S.C. §4332(e); and (3) in the event it cannot reach consistency, state why it cannot resolve the conflicts with Camas County. The same resolution stated above also acknowledges that federal law requires the Service to take into account all local efforts to conserve species prior to making a listing determination and to coordinate with the County when determining critical habitat. The resolution also acknowledges the County's primary planning authority for lands and wildlife within its boundaries, which it exercises in part by coordinating with all other federal and state agencies to ensure the policies set forth in this plan are consistently and uniformly applied.

RESOLUTION

NOW THEREFORE, BE IT RESOLVED by the Board of County Commissioners of Camas County, Idaho that:

- A. The foregoing Recitals are incorporated by this reference as part of this resolution.
- B. Camas County adopts the Plan (attached as Exhibit A). The Plan serves as an updated Plan with policies specific to the County based on the most current and best available data. Further, Camas County finds that in the best interest of the health, safety, and welfare of the citizens of Camas County
- C. Camas County recognizes the statutory obligation of the Bureau of Land Management and other Federal Agencies to make its planning, inventory and management activities consistent with the policies of Camas County and will continue to work to resolve the conflicts with the agency.
- D. Camas County appoints the Camas Conservation District as its representative in all matters that regard the plan.

Upon motion duly made and seconded, the foregoing Resolution was adopted by the following vote: 3 Aye 0 Nay

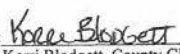
Adopted this 14<sup>th</sup> day of July, 2014.

COUNTY BOARD OF COMMISSIONERS

  
Ken Backstrom, Chairperson

  
Janet Croner, Commissioner

  
Barb McMurdo, Commissioner

Attest:   
Korri Blodgett, County Clerk

## Chapter 2: Purpose of the Plan

In recent years, the Greater Sage-Grouse, native to Camas County, has received national attention resulting in the U.S. Fish and Wildlife Service's (Service) determination in 2010 to list the species as a candidate for endangered status. This has prompted numerous state and federal agencies to modify their management plans for the species and its habitat in order to preclude an endangered listing in the eleven western states where it resides. As a result, there has been a lack of coordination and cohesiveness of conservation measures between the various agencies; importantly with Camas County.

The sage-grouse has been a vital part of the ecology in Camas County, and an equally important part of the culture. The State of Idaho has permitted the hunting of the species in the County since early settlement. The population has increased and decreased in response to natural environmental factors, primarily weather changes and predator dominance. It has benefited from the active agriculture industry of ranching and farming, which provide essential riparian and meadow habitat used seasonally by the sage-grouse throughout the year.

The sage-grouse habitat in Camas County is located in the 401,300 acres of native range, of which 120,490 acres are BLM managed and 280,810 are State and private lands. The original native vegetation consisted predominately of bluebunch wheatgrass, nevada bluegrass, basin wild rye, sod forming wheat grasses, needle grasses, balsamroot, little sunflower, big and low sagebrush, and bitterbrush. The rangeland is an extremely important segment of the economy.

***Monitoring data for the sage-grouse in the local area has been recorded since 1971 and currently show the species is static or improving.*** A consistent uptrend in males counted on lek routes has been observed since 1986. This indicates that the current productive agriculture activities and conservation measures being utilized in Camas County today are benefiting the species and should be maintained. Many of the primary impacts and threats identified at the national level are not an issue in Camas County. Therefore, conservation measures designed to correct these and other impacts must be thoroughly analyzed at the local level utilizing local expertise to ensure they are appropriate for the long-term health of the species and its habitat.

The State of Idaho has taken the lead in providing a management framework for the Greater Sage-Grouse in Idaho, releasing its first plan in 1997, calling for the development of local working groups. The North Magic Valley Sage-Grouse Local Working Group (NMVSGLWG) was formed to provide local management strategies for the North Magic Valley plan area (See North Magic Valley Sage-Grouse Conservation Plan, Figure 1), which includes Camas County. This group, currently made up of federal and state agency personnel, private and interested landowners prepared the North Magic Valley Sage Grouse Conservation Plan (NMVSGLWG) adopted in 2011.

The State's Plan was released in 2006, and more recently updated to be considered as an alternative in the National Greater Sage-Grouse Land Use Planning Strategy (Strategy) of the U.S. Bureau of Land Management (BLM) and U.S. Forest Service (USFS). Governor Otter's Sage-Grouse Alternative (State Alternative) was prepared for the purpose of providing "special

management for sage-grouse on lands managed by the BLM and USFS,” (State Alternative, page 3). The State also maintains that “with this management framework in place, the State will approach ... local governments ... to see what actions are necessary and appropriate to complement the State’s Federal Alternative” (page 3).

In an effort to provide the State this guidance, and for the purpose of ensuring the conflicts between the County’s plans and policies for the sage-grouse are considered and resolved by the BLM and USFS, as required under the National Environmental Policy Act, the County has formally established the Camas County Rangeland Management Plan (Plan), which incorporates best management practices and goals identified within the Camas County Landuse Plan, see appendix A. The Landuse Plan defines the policies and strategies that have been utilized effectively to manage the sage-grouse in Camas County and should be incorporated into all management activities of all agencies with responsibility for managing the species and its habitat.

As implemented, this Plan shall require these policies and principles be applied on public lands as “regulatory assurances” through Coordination and they will be applied on private lands as “incentive-based assurance.” In this way, the Plan serves as a planning tool for private land owners by informing and improving their conservation efforts on a voluntary basis with the added opportunity to amend this Plan as a result of their stewardship successes.

Finally, because of the scientifically sound habitat modeling conducted to identify the suitable habitat in Camas County which is the basis of this Plan, the County intends that this Plan may serve as a model for other counties located within the same management Region. Furthermore, this Plan explicitly relies on the Coordination process that requires federal and state agencies with sage grouse management responsibilities in Camas County to ensure that their plans are consistent with this Plan. Ultimately, the Coordination process will be the vehicle that brings disparate parties together with the same intent on making sound land management decisions that benefit the sage-grouse and its habitat recognizing that there are multiple uses being managed at the same time.

## **Chapter 3: Plan Area and Habitat Characteristics**

### **A. Plan Area**

The Plan Area includes all of the lands within the political boundaries of Camas County. This area is a high mountain valley area located in South Central Idaho, sandwiched between the Sawtooth National Forest and the Bennett Hills to the south. An area of similar use covers Camas and Blaine Counties by soil makeup and land use and Grouse migration habitat includes Gooding and Lincoln Counties and is known as the Wood River Area.

The Wood River Area is in the south-central part of Idaho. It includes about 751,800 acres in Blaine County, 469,000 acres in Gooding, 1,132,300 acres in Camas County, 344,320 acres in Lincoln County, and 218,600 acres in Minidoka County. The total area is about 1,784,020 acres, or 2,788 square miles. About 89 percent of the total area is rangeland, and about 11 percent is irrigated cropland and pastureland. Urban land makes up less than 0.2 percent of the area. The survey area includes private, State, and Federal land. The Federal land is administered by the Bureau of Land Management and the State land is administered by the Idaho Department of Lands. Fairfield is the county seat of Camas County; Shoshone, Lincoln County; Rupert, Minidoka County; and Hailey, Blaine County. The population of the survey area was about 14,906 in 1990.

The middle one-third of the survey area is a broad alluvial valley that is 3-11 miles wide and about 28 miles long. Camas Creek and its tributaries bisect the valley and most of the soils in this valley are cultivated. The southern one-third of the area consists of rolling uplands and the steep Mount Bennett Hills while the northern one-third consist of mountains and narrow alluvial valleys. The elevation ranges from 4,750 feet, near Magic Reservoir to about 10,095 feet in the Soldier Mountains. Fairfield is at an elevation of 5,059 feet; and Hill City is at 5,092 feet. Davis Mountain has an elevation of 6,806 feet.

The survey area lies within three geological provinces. The southern part of the area is in the Columbia Plateau Province, and the northern part is in the Rocky Mountain Province and the eastern part is in the Moonstone Cauldron. Relief and geology are extremely varied. The southern part of the survey area consists of rolling to steep uplands and hills that are composed of rhyolitic and silicic volcanics. The east-central part consists of smoothly sloping alluvial fans, terraces, and bottom lands. The northern part consists of steep mountains that are composed of granite and andesite.

Camas Creek drains most of the survey area. Twelve tributaries of Camas Creek drain the northern mountains, and two tributaries drain the southern hills. Camas Creek flows into Magic Reservoir.

With the large volume of land being held in public and state ownership, these lands must remain open and utilized for the full potential of their productive multiple uses. Camas County has demonstrated that this activity can occur and the sage-grouse will continue to thrive and even increase, as long as, the conservation measures employed by all of the agencies with

management authority over the habitat and species focus on the primary threats as they exist in Camas County, based on good science and inventory and not as they exist at the state or national level.

## **B. Habitat Characteristics**

Due to growing concerns over sage-grouse trends and populations, biologists from multiple federal, state, and local agencies in Idaho collaborated in 2000 and created a sage-grouse habitat planning map for the state. Habitat types included: Key sage-grouse habitat defined as areas of generally in-tact sagebrush that provide sage-grouse habitat during some portion of the year; Potential restoration area Type I- Perennial, defined as sagebrush limited areas characterized by perennial grass species composition and/ or structure that should provide suitable potential nesting habitat in the future, once sufficient sagebrush cover (at least 10%) is re-established; Potential Restoration Area Type II- Annual Grasslands, defined as areas dominated or strongly influenced by invasive annuals such as cheatgrass or medusahead rye, or similar species. Areas of sagebrush may be present but, in general, understories are not ideal for sage-grouse; and Potential Restoration Area Type III-Conifer Encroachment Areas, defined as areas where junipers and/or other conifer species are encroaching into sagebrush habitat areas.

The maps used by the NMV LWG have been provided by the BLM who states that they have been updated annually since 2002, based on improved information, the past seasons 'wildfire activity, vegetation treatments and successional changes noted by field-level biologists. It is noted however that some allotments, specifically in Northwest Gooding are classified as R1 habitat and subsequently grazing management guidelines are based on that designation. Inventory of the allotment indicates the species present actually are consistent with an R2 designation and difficulty arises when grazing management is judged against erroneous classification. The grazing permittee cannot be held responsible for maintenance of plant species which are not present in the allotment. This is an example where current and best science is necessary to develop local management planning.

The NMV LWG planning area consists of approximately 2,950,588 acres of mixed habitat types. Based on the 2010 habitat classification for Idaho, the NMV area contains 1,118,191 acres of 'key' habitat, 568,333 acres of 'R1' habitat, 258,938 acres of 'R2' habitat, and no 'R3' habitat types (Figure 1).

Occupied sage-grouse habitat is categorized into two delineations in Camas County. For general purposes these will be identified as Key and R1 (Perennial Grass) and are shown with location on the Habitat Classification Map. The locations where leks have been cited occur in the valley floor south of Camas Creek in the Bennett Hill range and heavy use in the Macon Flat area containing appropriate sagebrush cover. It is not appropriate to designate a primary habitat and a secondary habitat area in Camas County. All habitat that has been identified as either having lek's present or having the characteristics necessary to support the sage-grouse, shall be identified as "suitable habitat."

There is no good estimate of total acres of suitable habitat currently available. For purposes of discussion the areas as they relate to Camas County in the North Magic Valley Sage-grouse

Local Working Group Conservation Plan as adopted in 2007 and Figure 3 in the 2009 amendment the to same plan will be used as points of reference.

The following definitions apply to the Wood River Area but can be used to describe the habitat characteristics in Camas County.

### **1. Suitable Habitat**

Suitable habitat includes all seasonal habitats, including breeding habitats, early breeding habitats, summer late brood-rearing habitats and winter habitats. The description of these habitats can be found in the North Magic Valley Sage-grouse Local Working Group Conservation Plan (page 3 & 4), and are as follows:

### **2. Breeding Habitats**

Breeding habitats, called leks, generally occur in open areas surrounded by sagebrush from mid-March through mid-May. Local examples include low sagebrush flats and ridge tops, landing strips, old lakebeds, unpaved roads, cropland, and burned areas. Sage-grouse males form leks opportunistically at sites within or adjacent to potential nesting habitat. Nesting habitat and leks have the following conditions (Connelly, et al. 2000):

- a. Mesic sites have a sagebrush height that is 16-31 inches with a 15-25% canopy cover and a grass-forb height >7 inches with a  $\geq 25\%$  (15% perennial grasses and 10% forbs) canopy cover.
- b. Arid sites have a sagebrush height that is 12-31 inches with a 15-25% canopy cover and a grass-forb height >7 inches with a  $\geq 15\%$  canopy cover.

Habitats used by pre-laying hens are part of the breeding habitat. These areas should provide a diversity of forbs high in calcium, phosphorus, and protein. The ecological condition of these areas may greatly affect nest initiation rate, clutch size, and subsequent reproductive successes.

Sage-grouse hens typically select nest sites under sagebrush, although other shrub species may be used. Nests occurring under sagebrush cover have higher nest success than other shrub types, height ranges from 12-31 inches and nests tend to be under the tallest sagebrush within a stand. In general, sage-grouse nesting occurs under shrubs having larger canopies and more ground and lateral cover (spreading growth form rather than columnar).

Grass height and cover are important components of sage-grouse nest sites. Herbaceous cover associated with nest sites may provide scent, visual and physical barriers to potential predators.

### **3. Early Brood-Rearing Habitats**

Early brood-rearing habitats occur in upland sagebrush habitats relatively close to nest sites, but movements of individual broods may vary. The period of early brood-rearing is from mid-April to mid-June. These habitats may be relatively open (about 15% sagebrush canopy cover) stands of sagebrush with >15% canopy cover of grasses and forbs. Great plant species richness with



abundant forbs and insects characterize brood areas. Insects, especially ants (*Hymenoptera*) and beetles (*Coleoptera*) are an important component of early brood-rearing habitat.

Early brood-rearing habitats should have the following characteristics (Connelly, et al. 2000):

- a. Sagebrush height of 16-31 inches with a canopy cover of 10-25%;
- b. Grass-forb height is variable with a canopy cover >15%.

#### **4. Summer Late Brood-Rearing Habitats**

As sagebrush habitats desiccate, sage-grouse usually move to more mesic sites which are higher in forb availability through June through August. These areas include meadows or riparian areas dominated by mesic or hydric (also hydrophytic) plant species. The habitat should not have evidence of excessive erosion, though there may be some bare ground. The habitat suitability decreases as erosion increases or as xeric species invade the riparian/wetland zone. The presence of succulent, green forbs is essential. There should be sagebrush cover adjacent to the riparian areas to provide escape or protective cover. There are some upland sagebrush communities that provide late brood-rearing habitat due to elevation which helps to retain succulent, green forbs later into the summer. Wet meadows, springs, riparian zones and alfalfa fields are locally important.

#### **5. Winter habitats**

Movements to winter range are slow and meandering, and occur from late August to December. Wintering habitat is utilized from November through March. Feeding habits generally shift from forbs in early fall to sagebrush in winter. Characteristics of sage-grouse winter habitats are relatively similar throughout most of the species' range. During winter, sage-grouse feed almost exclusively on leaves of sagebrush in stands generally >15% sagebrush cover. On winter ranges, areas with access to sagebrush above the snow (such as south slopes and wind blown ridges) are important. Winter habitats should allow sage-grouse access to sagebrush stands with canopy cover of 10-30% and heights of at least 10-14 inches above snow cover.

### **Chapter 4: Threat Assessment**

There are numerous federal and state agencies that have management responsibilities for the sage-grouse and/or its habitat in Camas County. There are also other groups, such as the NMVLWG that have researched and studied the species and has provided advice and recommendations to the agencies. Each of these entities has individually prioritized the threats to the sage-grouse.

#### **A. U.S. Fish and Wildlife Service (USFWS)**

The Service has determined that it should list the species as endangered because it has found there to be (USFWS Candidate Notice, 2010):

1. Habitat Loss
2. Lack of Regulatory Assurances

### **B. Bureau of Land Management (BLM)**

The BLM has determined the greatest threats to the habitat to be (National Greater Sage-Grouse Conservation Measures/Planning Strategy, pg 6) (NTT Report):

1. Fire
2. Invasion of exotic grasses
3. Human Land Use
  - a. Tillage Agriculture
  - b. Historic grazing management
  - c. Energy development
  - d. Roads and power line infrastructure
  - e. Recreation

### **C. State of Idaho (State)**

The State of Idaho has found that the focus of all efforts should be on “enhancement of habitats, populations and connectivity.” They find the greatest threats to be:

1. Wildfire
2. Invasive Species
3. Habitat Restoration
4. Infrastructure

Secondary threats are:

1. Recreation
2. West Nile Virus
3. Livestock Grazing Management
4. Livestock Grazing Infrastructure

### **D. North Magic Valley Local Working Group**

The NMVLWG found there to be the following risks to the species (North Magic Valley Sage-Grouse Conservation Plan, pg 10):

High Risk

1. Habitat Fragmentation
2. Invasive plant species
3. Inappropriate management strategies

## Medium Risk

1. Improper livestock grazing
2. Fire
3. Other natural causes

## Low Risk

1. Excessive predation
2. Human disturbance
3. Health risks to sage-grouse populations
4. Over harvest
5. Successional vegetation changes in brood-rearing habitat.

## **E. Camas Board of County Commissioners (BOCC)**

While the Board of County Commissioners (BOCC) recognizes that these threats may be present at the national and state level, they do not represent the predominate threats in the unique climate and landscape of Camas County. Through the research and advisement of the County's Natural Resource Advisory Committee (NRAC) (see Appendix A), and after reviewing all of the plans stated above as well as the latest and best available science, the BOCC has determined that the primary threats to the Greater Sage-Grouse in Camas County are the following:

### **Primary Threats:**

1. Predation
2. Wildfire
3. Invasive plant Species

The BOCC has found that many of the threats prioritized by the federal and state agencies, as well as, the NMVLWG are low priority threats in Camas County. Also, human disturbances are not a concern as the current and previous populations of Sage-Grouse have successfully habituated to the human activity, primarily the active agriculture community that is continually changing. It is not an uncommon site to see sage-grouse in cultivated fields, jumping from row to row as farming and ranching operations are underway. The sage-grouse depend on the benefits provided by the agriculture community.

In contrast, the second primary threat in Camas County to the sage-grouse, Habitat Fragmentation, has received little, if any, recognition from both federal and state agencies. For this reason, the BOCC will be taking an active role to ensure that the proper cause and effect relationship between the threats and management activities are implemented in Camas County.

## **Chapter 5: Plan Implementation**

The BOCC or their assigned delegates shall be responsible for managing and implementing the Plan. Camas County has previously developed its Comprehensive Plan related to privately owned lands in the County. This Land Use Plan is now directed toward management of federally and state managed lands. As implemented, this Plan shall require these policies and principles be applied on public lands as ‘regulatory assurances’ through Coordination and they will be applied on private lands as ‘incentive-based assurances.’ In this way, this Plan serves as a planning tool for private land owners by informing and improving their conservation efforts on a voluntary basis with the added opportunity to amend this Plan as a result of their stewardship successes. With adoption of this Plan the County puts in place a "Comprehensive Plan" which includes "all land within the jurisdiction of the governing Board" as directed by the legislature. Idaho Code § 67-6528 provides that "the state of Idaho, and all its agencies, Boards, departments, institutions, and local special purpose districts, shall comply with all plans and ordinances adopted under the Local Planning Act."

### **A. Implementation on Public Lands**

The principles and policies contained within this Plan shall be required for the management of sage-grouse and its habitat on public lands that contain suitable habitat as described in the Habitat Characteristics above.

### **B. Implementation on Private Lands**

For private lands in the Plan Area, the principles and policies contained within this Plan are voluntary and encouraged to be implemented through Best Management Practices (BMP’s) and conservation measures for the management of sage-grouse and its habitat as defined as suitable habitat and depicted in **B Habitat Characteristics** above.

### **C. Implementation Process**

This policy shall serve as the primary conservation policy for the sage-grouse in Camas County. The BOCC has the unique authority to require federal agencies to coordinate their plans and policies with the County, and ability to coordinate with state agencies, therefore, ensuring that all entities with responsibilities for the species and habitat are working together efficiently and effectively and not pursuing counter-productive measures. This Plan is designed to serve as the comprehensive planning document for the sage-grouse in Camas County.

While recognizing that each agency has its own planning processes, federal agencies are required to not only consider the County’s policies, but work to resolve conflicts and make federal plans consistent with the county’s policies (43 USC 1712). Federal statues require that the County’s policies are integrated into the federal conservation strategy for the sage-grouse on federal lands within the County’s borders. The State of Idaho has given Camas County planning authority over lands within the County’s borders, ensuring consideration of the County’s sage-grouse policy with state agencies as well.

Implementation of this plan will be conducted through a formal coordination process with all agencies that have jurisdiction and/or responsibility for the sage-grouse and/or its habitat. The plan will serve as the unifying and primary planning document.

The BOCC shall utilize this Plan as a tool to evaluate and provide comment regarding land management decisions on both public and private land for which it has land management jurisdiction. More specifically, the BOCC shall utilize this Plan in evaluating land use development applications submitted under the County's comprehensive plan, as well as, ensuring that any federal or state land management action remains consistent with this Plan.

#### **D. Plan Update / Amendment Process**

This Plan is managed under adaptive management principles where it is understood that the scientific understanding of the species and its habitat will be continually expanding. This requires that the policies, principles, and best management practices of this Plan be frequently evaluated and modified as warranted by the best available science appropriate for the unique Plan Area in Camas County.

##### **1. Annual Review**

The BOCC will conduct an annual Coordination review, commencing one year from the date of enactment of this Plan with the federal and state agencies that have habitat or species responsibilities within the Plan Area. This review process will evaluate the availability and condition of habitats, direct and indirect impacts, conservation measures, policies and BMP's being implemented by each agency for their effectiveness and applicability to the Plan Area.

Also incorporated in this review is any new science and, if warranted, modifications to the BMP's, policies, and conservation measures within the Plan. The Coordination review shall take place in government-to-government meetings between the different agencies and the BOCC.

The BOCC will also initiate meetings with entities that have private property interests in the Plan Area for the purpose of analyzing their conservation efforts and effectiveness, as well as, any new science they may be able to contribute to the process to ensure Plan updates are also based on the best available science.

The consideration of changes to the Plan shall be discussed in these coordination meetings, followed up with a draft Plan update to be shared with all agencies through the Coordination process and private entities with private property interests for input. The input shall be considered and incorporated where appropriate into a formal written Plan update to be approved by the BOCC within 120 days of the submittal date of the requested change.

##### **2. New Scientific Information**

If at any time between the annual review period with federal or state agencies, or private entities with property interests in the Plan Area become aware of or acquire new science regarding the species or its habitat in the Plan Area within Camas County that may warrant changes to the

BMP's, conservation measures or policies within this Plan, then they shall submit a written report to the County, including the scientific review and supporting data, for the County's consideration. If the BOCC finds changes to the Plan are warranted, then it can initiate a formal review of the Plan in coordination with all entities.

### **3. Additional Coordination Meetings**

Additional Coordination meetings are encouraged beyond the required annual review and new scientific information review for the purpose of keeping apprised of and working to resolve all issues impacting the sage-grouse.

## **Chapter 6: Principles**

The Plan Principles are designed to inform and guide all decision making, regardless of specific issue or impact, as they relate to the well-being of the sage-grouse and the health, safety and welfare of the people in Camas County.

A. Southern Idaho homesteaders began to use the planning area for sheep and cattle grazing, cleared land for crops, and ultimately developed large water transportation projects that enabled further settlement and development. It is unknown what degree sage-grouse may have used areas converted to agriculture, pre-settlement. Much of these areas were covered by basin big sagebrush (*Artemisia tridentata*) which due to its ability to grow to a large size, may have only been utilized by sage-grouse post-disturbance or during very deep snow years. Additional sage-grouse habitat declines resulted overtime from infrastructure, rangeland improvements (crested wheatgrass seedings), and increased rangeland fire frequencies in areas dominated by invasive annual grasses.

Historic and current land conversions have reduced potential sage-grouse habitat to approximately 61% (1,801,997 acres) of the original acreage identified in the NMVSGGLWC planning Area. Approximately 1% (22,836 acres) of the area has been developed, and nearly 14% (408,800 acres) has been converted to agriculture (Figure 3). More than 70% of the planning area (based on buffering around infrastructure features using criteria from the state plan) is affected by some form of current or planned infrastructure, and the area contains some of the highest linear infrastructure density of Idaho's SGPAs (Figure 12). Currently livestock grazing allotments comprise 65% (1,902,598 acres) of the total planning area, and wildland fires have burned over two million total acres over the past 20 years.

B. The economy of Camas County is dependent upon productive ranching, farming, mining, and recreational industries. These industries represent the primary current and historical uses of the land. They are not only the vital part of the local economy, but they have also contributed to the sage-grouse's continued persistence. By enhancing the habitat through activities, such as, riparian improvements and proper livestock grazing, these industries

have both protected and improved the species habitat by reducing fuel for wildfires, controlling invasive species and limiting predators.

- C. Camas County has a population of approximately 1,124 (2011), and therefore is considered a “small local jurisdiction” as defined by the Regulatory Flexibility Act (5 USC 601). All proposed rules for the purpose of managing the sage-grouse or its habitat by federal agencies requires an economic analysis and consideration of that analysis prior to the finalization of the proposed rule. This analysis shall be prepared in Coordination with Camas County.
- D. Human disturbances have a minimal impact on the sage-grouse as the current population and those before it have been raised surrounded by an active agricultural and recreational community. If this activity were to be removed or reduced, it would create unintended disturbances to the species and may threaten their survivability.
- E. Sage-grouse management decisions shall be made based on the best available scientific information that is applicable to sage-grouse habitat in Camas County. The scientific information used will be consistent with standards of the Information Quality Act (44 USC 3516) (see definitions of Quality, Objectivity, Utility and Integrity), as verified by the County.
- F. Land management plans of all government agencies that have ownership or management responsibilities for the lands or species within Camas County shall be consistent with the policies set forth in this plan subject to valid existing rights.
- G. For private lands, the policies set forth in this Plan are encouraged through conservation incentives and BMP’s that do not encumber private property rights of the landowners, but do address long-term needs of sage-grouse.
- H. No policies shall infringe on the private property rights of any landowner within Camas County. All species and land coverage information gathered on private property shall be treated as the property of the landowner and shall not be used by any private or government entity for any purpose unless express, written permission has been obtained from the landowner.
- I. All sage-grouse habitat and species management programs that impact the County, administered by federal and state agencies, shall be coordinated with Camas County, and the data collected by state and federal agencies will be shared with the County in a timely manner and be provided to the County regardless of completeness.
- J. All public lands within the Plan Area containing suitable habitat for sage-grouse shall be managed to continue the multiple-uses of the lands as required by 43 USC 1707(a)(7). No policies shall be implemented that prescribe the management of lands for a single purpose, but all functions of the land, including providing habitat for wildlife and supporting the

productive uses of its resources, shall be considered with the objective of balancing and continuing all uses of the land. Unlike public owned land where there are many property interest holders and the multiple uses must be maintained, private land owners have more discretion to manage their property for the primary purpose of conserving sage-grouse, if so desired.

- K. The ability of wildlife, including sage-grouse, to habituate to inanimate manmade structures and changes to the landscape shall be acknowledged.
- L. All sage-grouse conservation measures enacted on public land or through a federal nexus shall be for the purpose of directly benefiting the species and its verified habitats. These measures shall be scientifically defensible. All data and information used to produce conservation measures shall be made available to the public and the County and shall be coordinated with the County. Additionally, the balance of impacts to other species and to human welfare must be weighed prior to approval and implementation. All planning efforts shall be governed through adaptive management principles to ensure that use of the latest scientific research on sage-grouse and their habitat; BMP's, technological advances, and incorporation of impact avoidance, minimization, and mitigation opportunities are vetted and utilized.
- M. Private land ownership of sage-grouse habitat areas should be continued and encouraged as private land conservation efforts have been the most effective methods to preserve diverse and healthy habitats for many species.

## **Chapter 7: Policies**

The policies set forth in this chapter are for the purpose of providing specific conservation measures that are to be implemented in the Plan Area in order to eliminate or limit impacts that may affect the suitable habitat of the sage-grouse.

### **A. Infrastructure and Roads – Habitat Fragmentation**

Infrastructure includes large scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g. oil and gas development, geothermal wells) airports, mines, cell phone towers, landfills, residential and commercial subdivisions. (State Alternative, page 11)

Roads provide necessary access to the area to ensure proper management of resources, infrastructure and assets, and accessibility in the event of emergencies. Because of the nature of the terrain in Camas County, most road surfaces, and driving conditions ensure that vehicles maintain low speed and the risk of collision with the sage-grouse is minimal in suitable habitat areas.

One of the primary threats to sage-grouse habitat in Camas County is Habitat fragmentation. Installation of access roads to enable power transmission lines and wind energy structures



continue to be planned across federal lands. If not properly managed there may be a reduction of nest success, survival of juveniles, and survival of adult birds.

### **Policy**

1. Limit motorized travel to existing roads, primitive roads and trails as verified by Camas County in suitable habitat.
2. Any road, primitive road, or trail closures must comply with Camas County's Transportation Plan and must be coordinated with the BOCC.
3. New infrastructure can be placed in suitable habitat, as long as, reasonable measures are taken to ensure there will be no deleterious effect on the sage-grouse, as determined by Camas County. Best Management Practices, as defined in the State's Alternative (pg 43) shall be followed.

### **B. Livestock Grazing**

Camas County continues to enjoy a long history of livestock grazing both on private and public lands. When properly managed, livestock can coexist with sage-grouse, as well as, help improve suitable habitat and decrease fire hazards.

### **Policy**

1. Maintain sustainable grazing consistent with historic land use and ranching practices, with the goal of attaining no net loss in economic value.
2. Livestock grazing is an important tool to properly manage sage-grouse habitat, and should not be removed from the Plan Area.
3. Any grazing restrictions or conservation measures that are implemented through a grazing permit shall be based solely on the conditions and activities specific to that permitted grazing allotment, as identified by specific allotment inventory.
4. Annual precipitation measurements and species composition should become a part of annual operating plans. If the monitoring data shows there is an increase in forage that supports additional livestock in a suitable habitat area, then increased grazing should be considered. If monitoring data shows a decrease in forage in a suitable habitat area, then a reduction in livestock can be considered as long as it is demonstrated that failure to do so would cause a deleterious effect on the sage-grouse.
5. Add sage-grouse guidelines into management plans as desired conditions, recognizing livestock grazing may not always be a causal factor (State Alternative)
6. Prioritize completion of land (range) health assessments and grazing permit NEPA analysis on allotments with declining sage-grouse populations, as verified by Camas County.
7. Allotment Assessments will use published Characteristics of sage-grouse habitat and comply with 43 CFR 4180.2(c).
8. Allotment management changes must be tailored to address specific problems when the cause of that problem has been determined using the best available science including the flexibility to change time on a unit, the number of livestock for a designated period of time and season of use.

9. Changes in grazing management should only occur when monitoring indicates sage-grouse objectives are not being met as a result of grazing practices.
10. Management changes, when needed, must be tailored to specifically address habitat objectives that need improvement, but should not adversely affect the habitat of other species.
11. Altering grazing schemes in allotments, where needed and appropriate, may be facilitated by enhanced grazing opportunities with introduced seeding or areas with lower values to sage-grouse. The unintended consequences of altering grazing use, such as possible increased risk of wildfire, must be carefully considered in any management proposal. (State Alternative)

### **C. Fire Management and Wildfire**

Wildfires are a common event in Camas County. This is due, in part, to basic weather patterns directing thunderstorms across the Bennett hills or along the Snake River. Multiple lightning strikes can be frequent during summer storms.

#### **Policy**

1. During fuels management project design, consider the utility of using livestock to strategically reduce fine fuels (Diamond et al. 2009), and implement grazing management that will accomplish this objective (Davies et al. 2011 and Launchbaugh et al 2007).
2. Prior to prescribed controlled burns near suitable habitat, all other fuel reduction methods shall be considered.
3. In the event of a wildfire, coordinate with appropriate agencies in developing and implementing rehabilitation plans.
4. When pursuing habitat restoration or rehabilitation, use native plant species, based on availability, and focus on the probability of successful establishment.
5. Following post burn habitat restoration, consider timely short term grazing to control invasive plant establishment and seed production such as Downey Brome and Medusahead grass. While rest and deferment is essential to establish desired grass species, especially native grasses, targeted grazing can aid in reducing seed head development and greatly reduced fuel loading for the following year's fire potential.

### **D. Monitoring and Habitat Category Changes**

The primary objective of this plan is to ensure the long-term health and continued existence of sage-grouse in Camas County. Regular monitoring of the species and its habitat in Camas County is essential to ensuring the policies and best management practices are updated and implemented within the Plan Area.

## **Policy**

1. All federal and state agencies, with management responsibilities in the plan area for the species and/or its habitat, shall provide the County with an annual update of the monitoring programs they have in place, data collected and specifics about their collection protocols. These agencies will inform the County of proposed research projects and allow for the County's input and collaboration prior to implementation.
2. All data shall be collected and studies prepared using protocols that will ensure the quality, utility, objectivity and integrity of the information as required under the Information Quality Act.
3. All data that is gathered in the Plan Area shall be shared with the County in a timely manner, and supplied to the County regardless of its state of completion.
4. Private landowners are also encouraged to monitor and share data collected on private property with the County.
5. All data that is shared with the County that is not public information will be treated as confidential and used by the County only to help inform its policies and best management practices.

## **E. Invasive Species**

The County has actively worked to control invasive plant species, primarily through the Cooperative Weed Management Areas (CWMA) and maintains a good working relationship with the federal and state agencies for the purposes of controlling the introduction or spread of invasive plants.

## **Policy**

1. The Cooperative Weed Management Areas (CWMA), in cooperation with all land managers, shall encourage the continuing inventory for invasive species.
2. Areas of suitable habitat, where non-natives have invaded, shall be prioritized for treatment in coordination with the BOCC and the CWMA.
3. The County's Invasive Species Plan shall be followed when any treatment, reseeding or restoration projects occur in or around suitable habitat.

## **F. Predation--NMVSLWC**

Historically, predation is the primary cause of mortalities on the sage-grouse (Bergerud 1988). Sage-grouse are common prey for numerous predators present in the County, including coyotes,

ravens, various raptors, eagles, feral cats and, more recently, wolves. “While some level of predation should be expected in all sage-grouse populations, in certain situations predator/prey relationships may become disrupted, resulting in excessive predation. For example, the establishment of non-native predator species or an unusually high number of one or more predator species, may be cause for concern.” (July 2006 Idaho Sage-grouse Conservation plan, 4-10)

### **Policy**

1. Prior to implementing any conservation measures that decrease the productive use of the land for the benefit of the sage-grouse, the impact of predation must be considered. Measures must be put in place to control predation to the satisfaction of the BOCC, if found to be the cause of the impact.
2. The BOCC will coordinate with the Idaho Fish and Game to determine appropriate predator control measures.
3. Encourage private landowners and citizens to document predator occurrences and provide these to the BOCC so that the proper agencies can be notified and appropriate control measures implemented.
4. Anti-perch devices will be encouraged, but not required, for all existing and future transmission lines and structures that may have a deleterious effect on sage-grouse in suitable habitat.

### **G. Recreation**

Recreational use within the Plan Area is extremely important as the majority of the land is publicly held and access is crucial to the economic viability of the County. Full access to public land shall remain open and accessible to the people.

### **Policy**

1. Any plan for creating new or additional recreational opportunities on federal lands in suitable habitat must provide Camas County a sage-grouse impact analysis for review.
2. Limit motorized recreational use to existing roads, primitive roads, and trails, as verified by Camas County in suitable habitat.
3. Any road, primitive road and trail closures must comply with Camas County’s Transportation Plan and must be coordinated with the BOCC.

### **H. Mineral Development**

The geology created the extensive mining activities which contributed so much to the economy, and early settlement defining culture, and characteristics of the counties and state.

Mining has always been a small component of Camas County’s history and should continue. Mineral access, claim access and future mineral development can all be pursued, as has been done historically in habitat that is also occupied by the sage-grouse, following best management

practices and with the advancement of technology that continues to reduce short-term and long-term impacts.

### **Policy**

1. Mineral development can occur in suitable habitat utilizing best management practices and taking all reasonable measures to reduce impacts and avoid impacts to suitable habitat where possible.
2. Conservation measures designed to protect suitable habitat shall not affect access to any existing or future mining claim.
3. No federal land mineral withdrawals shall be made as an effort to conserve suitable habitat. Full access to all resources must be maintained in order to ensure a productive economy and the health, safety and welfare of the citizens of Camas County.

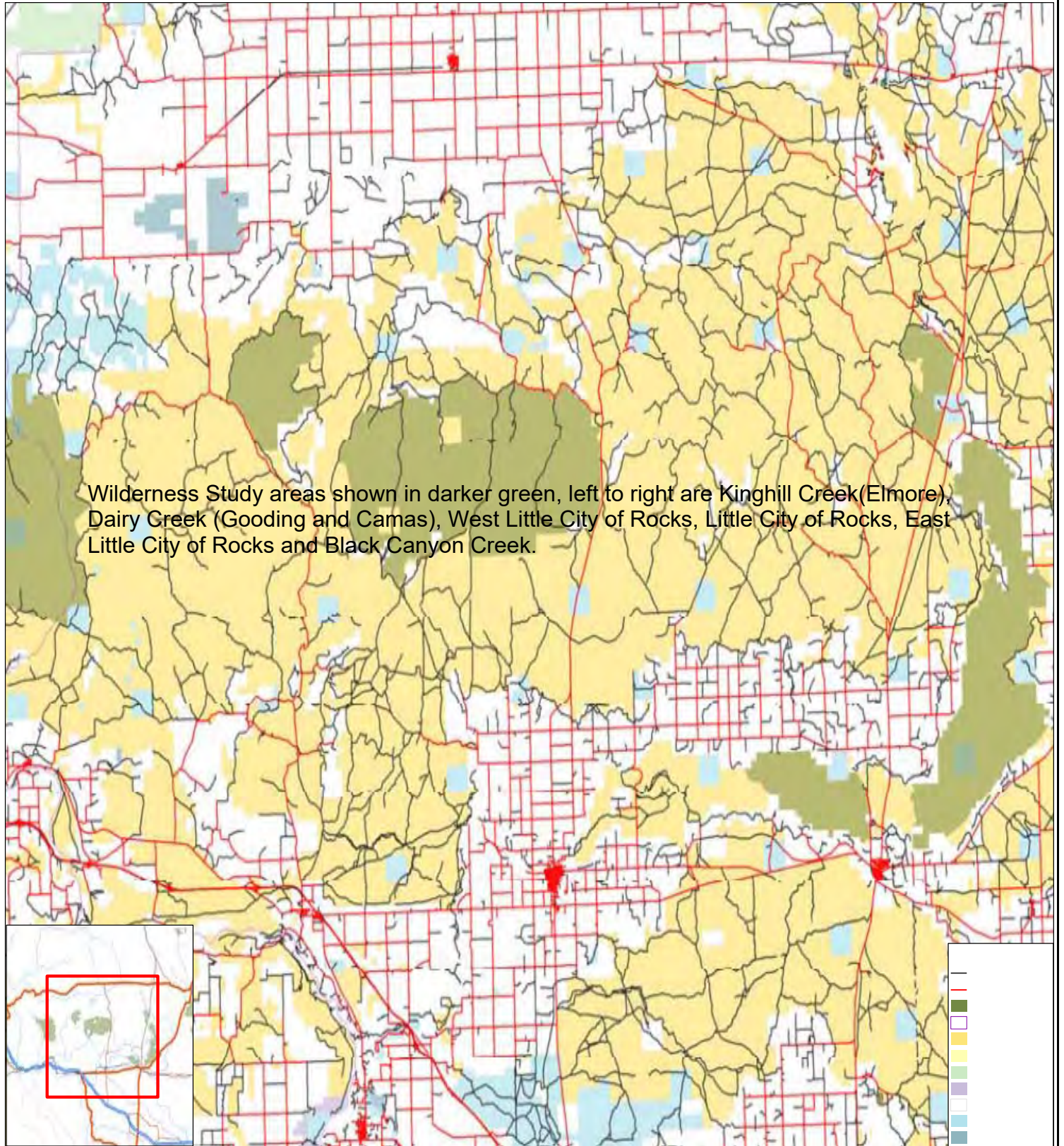
### **I. Areas of Critical Concern and Wilderness Study Areas**

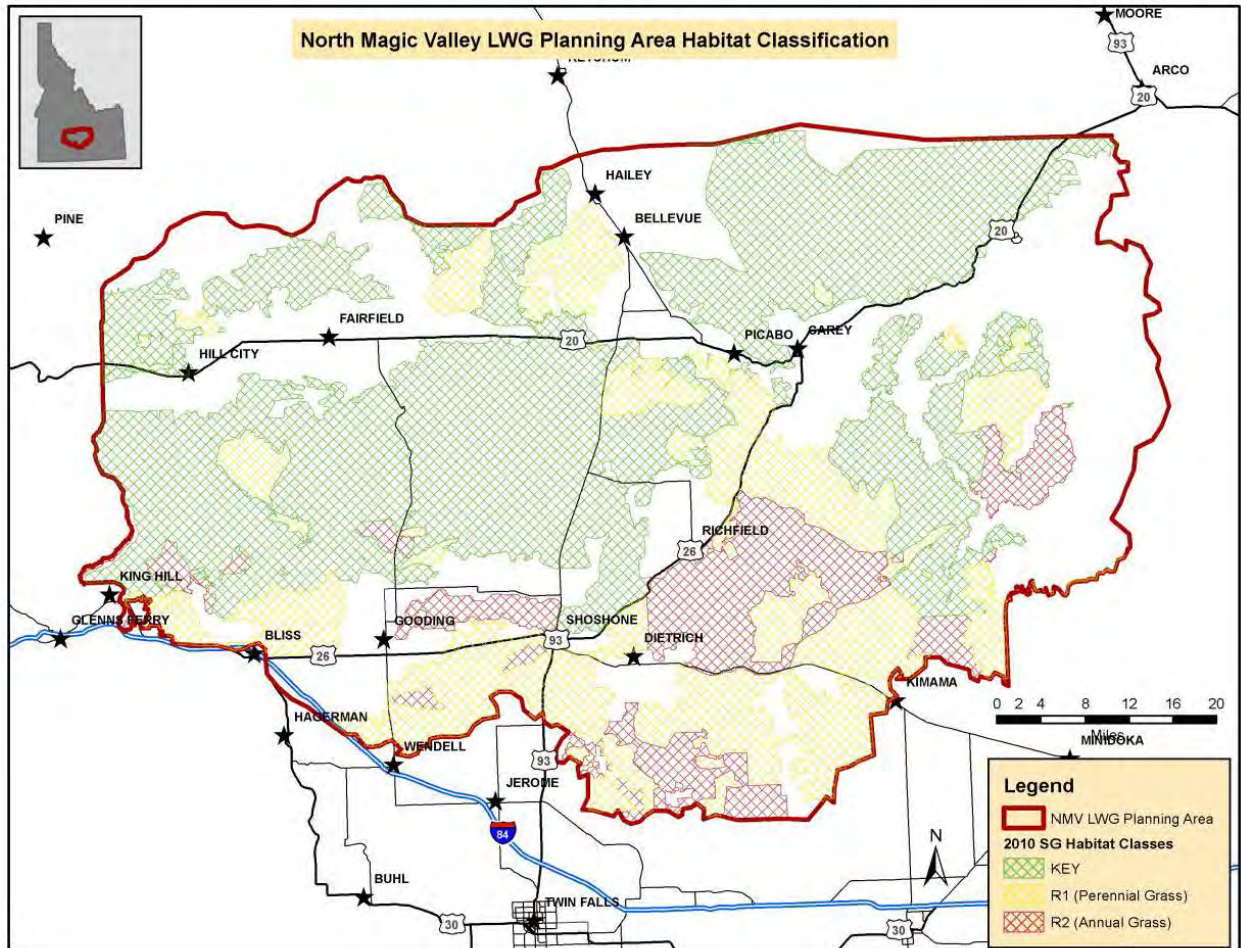
Currently, there are two Wilderness Study Areas (WSA) in Camas County and seven additional Areas within the Grouse migratory area for a total of nine. The WSA residing within Camas County, located from west to east are Dairy Creek,. These areas were designated by BLM in response to a Congressional request for roadless areas containing wilderness characteristics in 1979. In 1993 the Agency reviewed the submitted Area list to determine which areas would be presented with recommendations to proceed as meeting the criteria and which areas are not fully supporting the Wilderness Area intent. All of the Camas areas submitted were reviewed and it was determined that these areas did not fully meet the criteria for listing as a Wilderness Area. The final decision to either list or release lands for non-wilderness uses resides solely with Congress, however: the BLM is required to manage the Areas on the list to a level which maintains the wilderness characteristics as existed in 1980 until they are delisted. This thirty three year period of interim designation without decision has the potential to limit future access and productive use of the land, which may limit the County's revenue and future ability to properly manage the suitable habitat and ensure the long-term viability of the sage grouse.

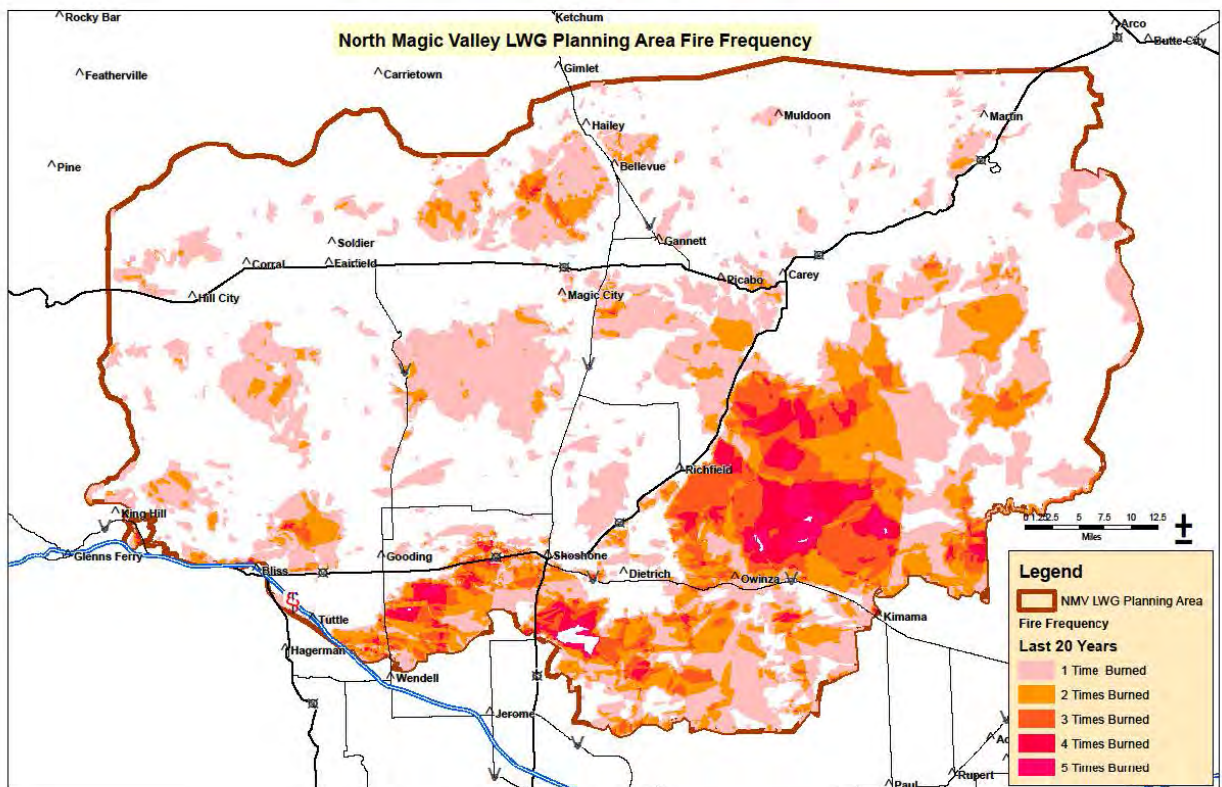
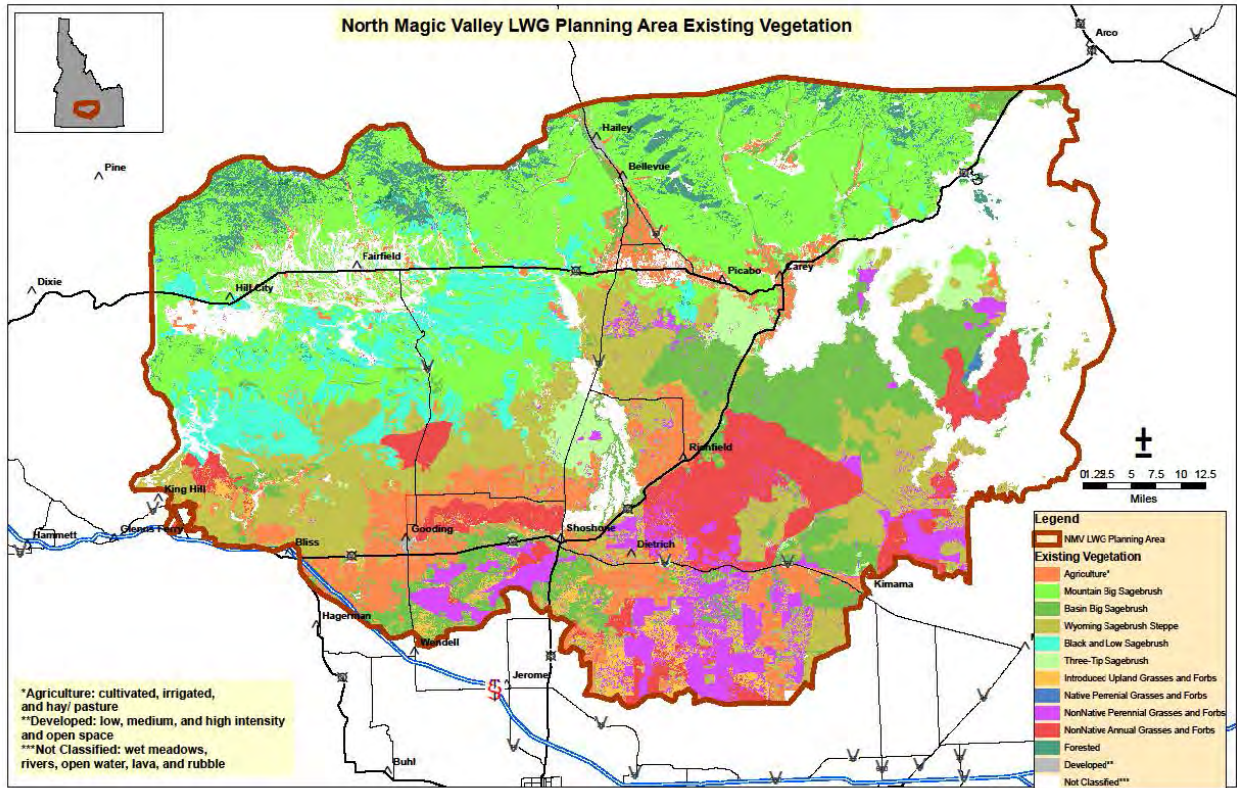
### **Policy**

There shall be no new designations of Areas of Critical Concern (ACEC's) or WSA in Camas County. If such designations are being considered by federal land managers, then the county is to be informed immediately and the consideration of the designation coordinated with the County. With the existing Wilderness Study Areas, the listing qualifications should be reviewed and concurred with by the Camas County Commissioners to ensure realistic goals and benefits can be achieved. If the targeted area does not warrant listing by supporting all characteristics for a Wilderness Area, a request for delisting should be presented to Congressional representatives to allow full management strategies for consideration.

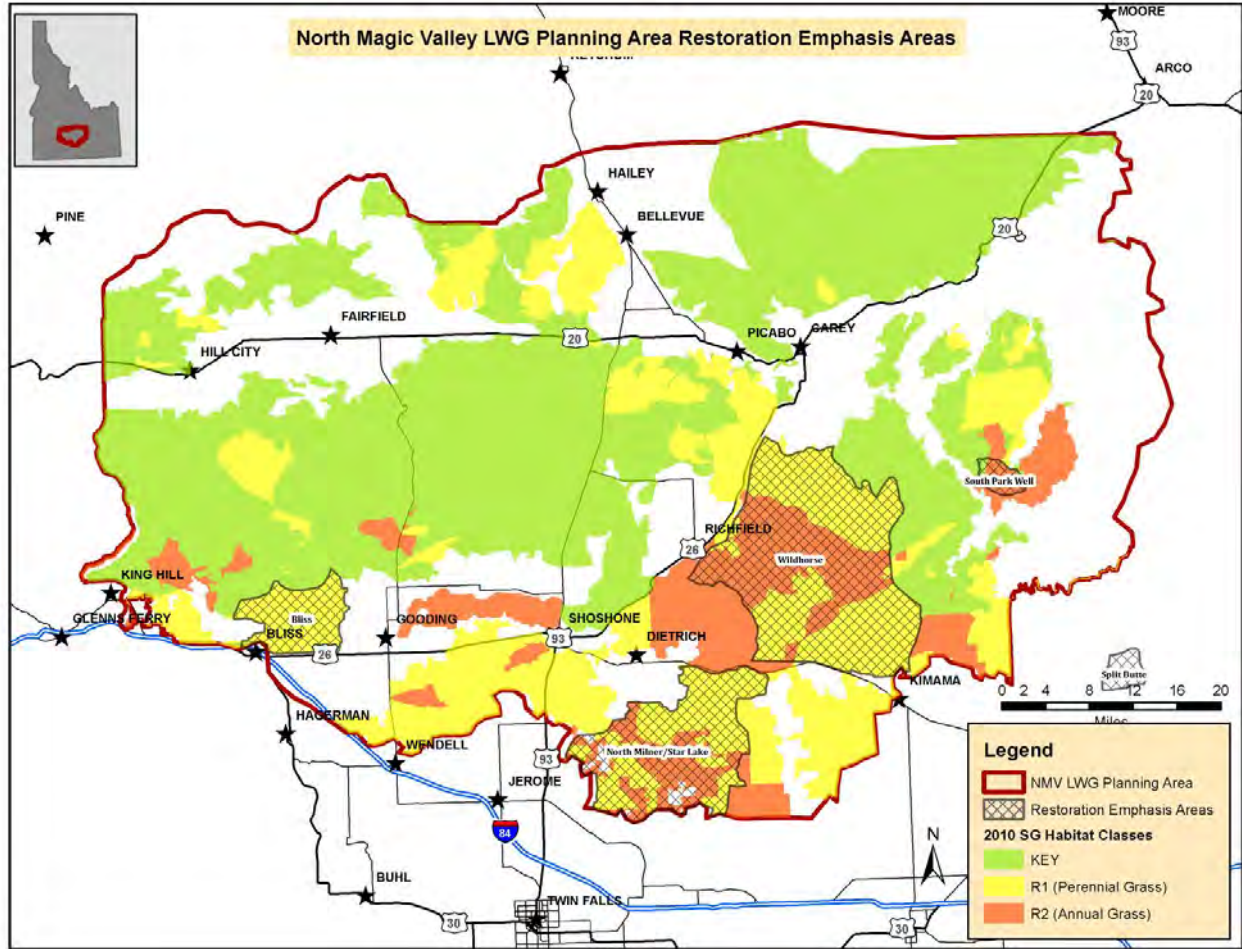
The following maps are included for informational purposes only. Specific comments relating to map information may be found included in various topic discussions. The five county areas include Camas County and coverage demonstrates the full range of habitat utilized by the local Grouse population.











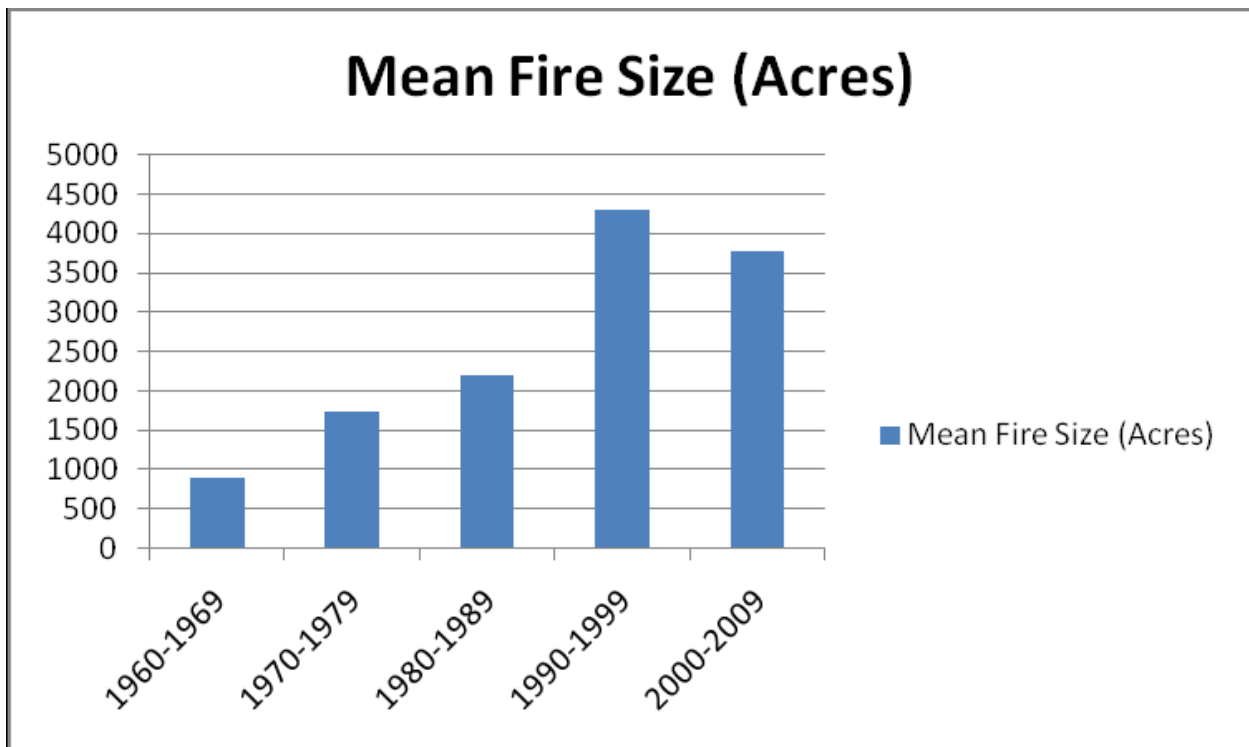
It should be noted that the Restoration Emphasis Areas targeted on this map have a definite correlation to the preceding Fire Frequency Map.

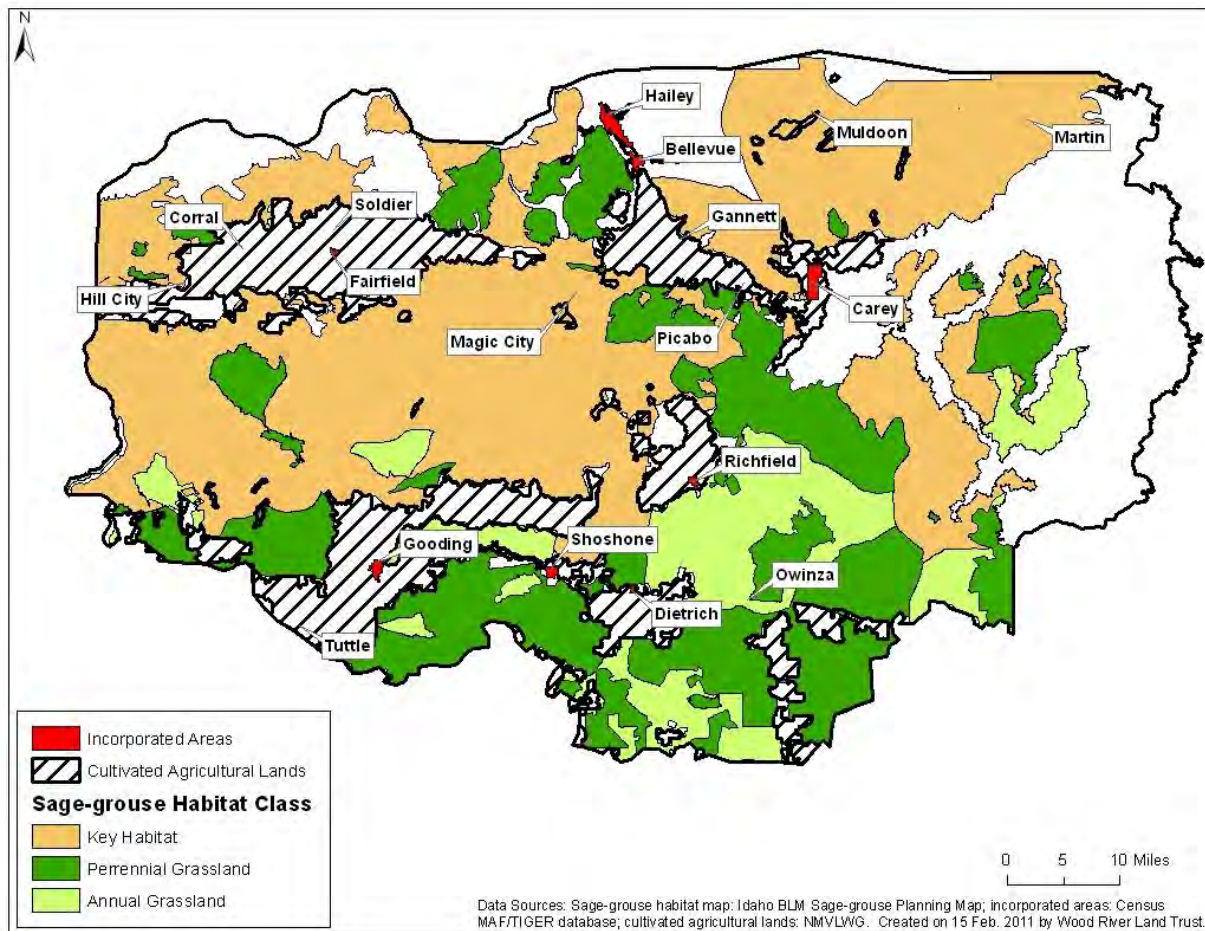
### Threats Prioritization

Each member of the NMV SGLWC Group was issued 5 dots to place one each on the threats they believe are the most significant to the NMV Planning area. The purpose of this exercise was to determine the Group's collective view of threat importance and help determine level of effort for threats description.

Dot's Ranking Exercise Results

# Dots Received	Rank	Threat <i>(including sub threats as shown above)</i>
10	1	Urban / Rural Development
9	2	Annual Grasslands / Wildfire; prescribed fire
8	3	Poor Livestock Management
7	4	Infrastructure; mines, gravel, landfills
7	4	Disease; West Nile Virus
6	5	Agricultural Practices; sagebrush control, insecticides
4	6	Predation
2	7	Human Disturbance
1	8	Sport Hunting; falconry
0	9	Isolated Populations
0	9	Agricultural Expansion
0	9	Seeded Perennial Grasslands
0	9	Conifer Encroachment





### 3.1.9 Data Gaps identified by U.S. Fish and Wildlife Service

In the discussion of the factors contributing to the greater sage-grouse not warranted Finding, participants in the USFWS structured range-wide science panel identified a number of data gaps that if resolved, could reduce uncertainty in their assessment of the likelihood of extinction within a certain time frame or even change their estimates (USDI-FWS 2005). This information is included in this Plan because it provides an important window into some of the uncertainties and research, monitoring and evaluation needs that exist at the broad-scale (e.g., state or range-wide) and that might factor into future decisions regarding potential listing of the species.

The areas of uncertainty identified by the USFWS experts included:

- Systematic (e.g., species, subspecies) relationships among various grouse species;
- Underlying mechanisms by which sage-grouse populations respond to habitat changes;
- How to scale grouse habitat preference up to the level at which federal land is managed;
- Lack of studies across the range limits inferences;
- Effects of invasive plants;

- Application of grazing techniques to favor sagebrush habitat;
- Underutilization of the case study approach for sage-grouse management
  
- Future gas and oil development impacts;
- Future advances in horticulture and fire suppression;
- The role of crested wheatgrass in sagebrush management; and
- The effectiveness of USDA Conservation Reserve Program or other easement and incentive programs.

## **Appendix A: Rationale for Landuse management Coordination in Camas County**

The people of Camas County have historically and traditionally earned their livelihood from activities reliant upon natural resources. The economy of the County has always been, and is today, still largely dependent upon ranching and agricultural operations, activities critically and economically related to ranching and farming, and other activities reliant upon the availability of natural resources and reasonably accessible water supplies.

Privately owned land is intermingled with the federal and state lands. Management decisions for the federal and state lands directly impact use of, and the economic value of, private land. Restrictions on, and reductions of, grazing on federal lands, for example, will require the rancher to reduce the size of his herd, to find alternative grazing land, increase reliance on expensive harvested feed, or seek relief through a combination of these measures. If he must graze the herd solely on his private ground, he will lose the source of winter forage for his herd. His forage costs will dramatically increase because he will have to buy feed for the herd. There is no alternative land available in Camas County, so even if forage is found outside the County, the transport costs would be extremely high. Either reduction in herd size, or much higher feed costs, or severely increased transport costs would result in a critically adverse outcome. Economists hold that for every dollar loss to the rancher, there will be a resulting impact to business income in the surrounding areas of the County. Specific economic impact models have been completed and included in other county landuse plans such as Owyhee County.

The economic stability of Camas County incorporates continued multiple uses of the federal lands. Tax revenue is available to the County mainly through the ad valorem property tax. Secondarily is the County's share of sales tax receipts. The limited amount of private property greatly restricts the tax revenue of the County. That limited tax base must be protected, and the continued vitality of that tax base is dependent upon continued multiple use of the federal lands. If multiple uses are restricted, business income will suffer and sales tax will be reduced. If grazing is restricted, financial pressure will be placed on the rancher which may even result in his going out of business. When that happens, the tax base of the County suffers, and the business income within the county and in the surrounding region is also reduced.

### **MULTIPLE USE AND COORDINATION WITH FEDERAL AND STATE AGENCIES**

This Plan provides a positive guide for the Land Use Committee and the Board to coordinate their efforts with federal and state land management agencies in the development and implementation of land use plans and management actions which are compatible with the best interests of Camas County and its citizens. The Plan is designed to facilitate continued and revitalized multiple use of federally and state managed lands in the County. The Natural Resources Committee, the Board, and the citizens of Camas County recognize that federal law mandates multiple uses of federally managed lands and they positively support multiple uses. Maintenance of such multiple uses necessarily includes continued maintenance of the historic and traditional economic uses which have been made of federally managed and state managed lands in the County. It is therefore the policy of Camas County that the Natural Resources

Committee and the Board work constantly to assure that federal and state agencies shall inform the Board of all pending or proposed actions affecting land use, local communities and County citizens and coordinate with the Board in the planning and implementation of those actions. (See Appendix I, Federal Land Policy and Management Act)

Camas County has previously developed its Comprehensive Plan related to privately owned lands in the County. This Land Use Plan is now directed toward management of federally and state managed lands. With adoption of this Plan the County puts in place a "Comprehensive Plan" which includes "all land within the jurisdiction of the governing Board" as directed by the legislature. Idaho Code § 67-6528 provides that "the state of Idaho, and all its agencies, Boards, departments, institutions, and local special purpose districts, shall comply with all plans and ordinances adopted under the Local Planning Act."

A long series of decisions by the United States Supreme Court set forth the position that when a validating or confirming statute is passed, the legal title to the possessory right passes as completely as though a patent had been issued. Title to allotments of federal land for grazing have been validated or confirmed for over a century, and the boundaries of those allotments have been adjudicated. The Stock Raising Homestead Act of 1916 culminated development of the settlement acts regarding the lands "chiefly valuable for grazing and raising forage crops" when it completely split the surface estate from the mineral estate in order to allow for the disposal of legal surface title to ranchers, while retaining undiscovered mineral wealth to the United States.

The individual preference for use of usual and customary range by local established ranches was recognized by the Idaho Statutes long before passage of the Taylor Grazing Act of 1934. A series of early Idaho laws (including, I.C. 25-1302 in 1881; I.C. 25-1907 in 1883 and I.C. 25-1004 in 1941) were adopted to regulate and legally protect the use of usual and customary range from grazers without a historic use right. Subsequent Idaho law confirmed the appurtenance of grazing preference right to the base ranch property I.C. 25-901. Grazing preference rights owned by Camas County ranchers were acknowledged and secured by passage of the Taylor Grazing Act in 1934. Every subsequent Act regarding management of the federal lands has protected and preserved all "existing rights" such as the grazing preference right.

The ranchers of Camas County who graze livestock on the federal lands have a preference to graze there. The grazing preference owned by Camas County ranchers was acknowledged and secured by passage of the Taylor Grazing Act in 1934. Every subsequent Act regarding management of the federal lands has protected and preserved all "existing rights" such as the grazing preference.

## **LIVESTOCK GRAZING:**

The Taylor Grazing Act of 1934, 43 U.S.C. § 315, was passed primarily to provide for stabilization of the western livestock industry; and that Act is still sound law. The Act authorized the Secretary of Interior to establish grazing districts in those federally managed lands which were "chiefly valuable for grazing and raising forage crops." The Secretary was authorized to act in a way that would "promote the highest use of the public lands." 43 U.S.C. § 315. The Act authorized the Secretary to issue grazing permits on a preferential basis with preference to be given to those "land owners engaged in the livestock business," "bonafide occupants or settlers," or "owners of water or water rights." 43 U.S.C. § 315 (b). The Secretary was authorized to take action to stabilize the livestock industry which was recognized as necessary to the national well being.

The Act also recognized the property interests of a permittee in the form of an investment backed expectation in § 315 (b). That Section provided that no preference would be given to any person whose rights were acquired during the year 1934 except that the Secretary could not deny the renewal of any such permit "if such denial will impair the value of the grazing unit of the permittee, when such unit is pledged as security for any bonafide loan." Emphasis added.

The Federal Land Policy and Management Act of 1976, 43 U.S.C. § 1701 et seq., did not limit, restrict or amend the purposes and provisions stated in the Taylor Grazing Act. Section 1701 stated the policy of the Congress as follows: "The Congress declares that it is the policy of the United States that --- .

(2) "The national interest will be best realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other federal and state planning efforts; . . .

(8) The public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural conditions; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use; . . .

(12) The public lands are managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining Minerals Policy Act of 1970 . . . as it pertains to the public lands".

The Public Rangelands Improvement Act of 1978, 43 U.S.C. § 1901-1908, once again revitalized the purposes of the Taylor Grazing Act, providing that the Secretary of Interior "shall manage the public rangelands in accordance with the Taylor Grazing Act, the Federal Land Policy and Management Act of 1976 and other applicable law consistent with the public rangelands improvement program pursuant to this Act." See 43 U.S.C. § 1903, which also provides that:

"the goal of such management shall be to improve the range conditions of the public rangelands so that they become as productive as feasible in accordance with the rangeland management

objectives established through the land use planning process, and consistent with the values and objectives listed in [Section 1901]."

The values and objectives listed in Section 1901 by which the Secretary was to be guided include a finding and declaration by the Congress that:

"to prevent economic disruption and harm to the western livestock industry, it is in the public interest to charge a fee for livestock grazing permits and leases on the public lands which is based on a formula reflecting annual changes in the costs of production." 43 U.S.C. § 1901 (a) (5)."

The Congress further found and declared that one of the reasons the Public Rangelands Improvement Act was necessary is that segments of the public rangelands were producing less "than their potential for livestock" and that unsatisfactory conditions on some public rangelands prevented "expansion of the forage resource and resulting benefits to livestock and wildlife production." 43 U.S.C. § 1901 (a) (3). The Act mandates improvement of the rangelands in order to increase the potential for livestock development and to prevent economic harm to the "western livestock industry."

In accordance with these Federal Acts - - - The Taylor Grazing Act, The Federal Land Policy and Management Act and The Public Rangelands Improvement Act - - - the Bureau of Land Management is required to preserve the stability of the western livestock industry and to provide for multiple use management including necessary range improvements for the benefit of livestock production, wildlife habitat, watershed protection, and recreation. These federal mandates can be met only by management of all federally managed lands within Camas County in such a way as to provide for continued use of allocated forage by permitted livestock and to work toward the restoration of forages to recover suspended Animal Unit Months (AUMs). The Act requires management practices designed to improve the range so that it will support "expansion of the forage resource" to the benefit of livestock production as well as wildlife.

Range improvements necessary to maintain current levels of livestock production; wildlife habitat, watershed protection, and recreation opportunity must be identified by the Bureau of Land Management and will be identified by Camas County, with appropriate input from affected interests. The Secretary of Interior, and therefore the Bureau of Land Management, is committed by statute to preserving the stability of the livestock industry. The stability of that industry as a whole is directly related to the stability of the individual ranches that make up the industry, including those in Camas County. The stability of the livestock industry in the County requires that the statutory mandates be followed.

The quality of economic life of Camas County as well as the scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values which are part of life in the County protected by the Federal Land Policy and Management Act require that the statutory mandates for stabilizing the livestock industry be followed.

However rural counties' socioeconomic wellbeing, safety, and culture are intimately tied to the management of the surrounding public lands. Moreover, counties are required by state law to



oversee the economic, social, and general wellbeing of the people and resources within their jurisdictions. In light of this, local land use plans are used to state the general requirements a county (or other local government) has of the surrounding federal land in order to meet these responsibilities. But in the end, all local land use plans have the same purpose: to serve as an officially adopted document laying out—in general terms—what management approaches on the neighboring federal lands a local government body requires to be taken in order to fulfill its statutory responsibilities.

Here are just a few examples of issues a local land use plan might address:

Specific goals as stated in the Camas Comprehensive Plan require that Rangeland in Camas County will develop landuse plans for including wildlife management which contains:

- Grazing plans developed rest and deferred rotation with independent monitoring targeted to maximize quality of range habitat and condition and trend, and tailored with season of use consideration.
- Be based on best/current science. Wildlife mitigation measures and habitat will utilize or be compatible to USDA-NRCS BMPs.
- Habitat and grazing plans will be developed for each allotment based on current inventory. Range land monitoring will be completed annually by establishment of transects or permanent photo points to insure habitat stability.
- Adjustments to grazing plans will be based on specifically identified impacts. Adjustments to grazing AUM's resulting from outside trailing use will be first deducted from voluntary reduced AUM set aside.
- Provide no loss of economic productivity
- Have no loss in demonstrated beneficial multiple use
- View grazing as management tool to control fire and invasive grasses (downy brome following fire)
- Balance productivity, sustainability and benefits when considering desired use of native grasses in restoration seeding.

**Appendix B: Members of the Natural Resource Advisory Committee**

Bill Davis Chair Camas Conservation District

Steve Miller, Supervisor of Camas Conservation District

Kevin Wear, Supervisor of Camas Conservation District

Kevin Dugan, Supervisor of Camas Conservation District

Lou Anderson, Rancher, Camas County

Brenda Moyer, Administrative Assistant, Camas Conservation District

Stephen Thompson, District Conservationist USDA-NRCS

## Brent Ralston

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**From:** Lauren Mermejo  
**Sent:** Wednesday, July 09, 2014 5:42 PM  
**To:** Joan Suther; Brent Ralston; Melvin (Joe) Tague; Randall Sharp  
**Cc:** Matthew Magaletti; Kathryn Stangl; Glen Stein; Johanna Munson; Quincy Bahr  
**Subject:** Utah's Overview of Cross-Walk Current Issues  
**Attachments:** BLM Addressing of FWS COT Cross-Walk Recommendations\_07-08-14.docx

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Hey Folks –

I am sharing with you a paper that Quincy put together this morning in preparation for a meeting with the FWS today. He basically took the cross-walk table and their accompanying letter from the Draft EIS and identified how the issues had OR HAD NOT been resolved in the Proposed Plan. During today's meeting, some of them were further resolved, and others "popped-up". Quincy will be refining this paper based on today's meeting and future meetings with FWS yet to happen.

In effect, the remaining issues will probably surface again at the FFM in August, and thus, it is a good idea to provide this information to us in preparation for the FFM.

**SO.....a new homework assignment for all of you: Could you each do something similar to Quincy's paper and forward to me by the end of next week? Please display where you had problems in your cross-walk table, as well as what was provided in the FWS letter and show how you have or have not resolved those issues and comments. I will be sharing your information with the WO as we prepare our FFM agenda and talking points.**

It will be very important for us to know where the discrepancies are with FWS at the local level for the FFM.

Sorry to create more work for all of you.....but if you have been coordinating closely with FWS, the right hand column should show how it's all been resolved, or not!

Thanks,  
Lauren

## How FWS COT Cross-Walk Recommendations were Addressed in the Utah Sub-Region GRSG Proposed Plan

COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Fire	1) Emphasize fire management within the natural variability of fire activity as defined by the best available science. Natural variability is defined as the ecological conditions, and the spatial and temporal variation in these conditions, that are relatively unaffected by people, within a period of time and geographical area appropriate to an expressed goal (Landres et al. 1999 in Baker 2011 ).	Pending consistent language for the Great Basin Region related to FIAT. No change specifically made, since "natural variability" may not provide for GRSG habitat objectives in every instance.
Fire	2) address the need to eliminate prescribed burning in GRSG breeding habitats unless biologically justified; if prescribed fire is retained as a management option, then a risk analysis (e.g., currently in development by WAFSA) should be required;	MA- FIRE-3
Fire	3) commit that GRSG populations must exist for restoration to be considered successful (i.e., inclusion of MA-GRSG-4 from Alternative C);	<b>No change made.</b> Discussed in various meetings, as well as in Portland and Denver with the other sub-regions. We are managing the habitat. We did include occupancy as one of the two components of no longer being considered "disturbed" but not the sole piece.
Fire	4) include a comprehensive framework of the monitoring framework that will be used;	Updated the monitoring appendix with the NPT recommended Monitoring Framework.
Fire	5) Include the ability to close fire-prone areas to OHV use during the fire season. We believe that Alternative D (MA-TTM-3) could meet this conservation option; however, we recommend modifying it to include specific language that will allow BLM/FS the flexibility to close OHV routes during the fire season.	MA-TTM-11
Fire	6) implement a collaborative system to allow effective coordination across jurisdictional boundaries as recommended by Alternative E1 (MA-FIRE-1);	MA- FIRE-1
Fire	7) apply limits to the use of vegetative stripping in healthy, unfragmented habitats unless fire and ecological conditions warrant;	MA- FIRE-3
Fire	8) add a specific discussion that ties the use of invasive pinyon-juniper removal as a potential fire management tool;	MA- FIRE-3
Fire	9) include the ability to develop and maintain sufficient native seed storage, rather than emphasizing the use of non-native seeds to address shortages;	<b>No change made.</b> Not an RMP decision.
Fire	10) Include the use of mechanical pinyon-juniper removal as a fire management tool;	MA-FIRE-3 and MA-VEG-1
Fire	11) Apply limits to the use of vegetative stripping in healthy, unfragmented habitats unless fire and ecological conditions warrant.	Same as Fire #7 above.
Fire	From main letter: Implement BLM Instruction Memorandum (IM) No. 2013-128, or its most recent iteration, for fuels management and fire operations direction.	MA-FIRE-2
Non-Native Invasive Plant Species	Implement Alternative C's 3 percent surface disturbance cap (inclusive of existing disturbances and fire) to PPMAs to maximize the integrity of large, intact sagebrush patches--at a minimum, if Alternative D is selected it should be modified such that the 5 (we recommend 3) percent disturbance cap includes fire disturbances because these disturbance play a large roll in the invasion of non-native plant species.	Proposed plan adopts a 3% disturbance objective with fire considered in the equation by affecting habitat availability (denominator). Consistent with regional coordination in Portland and Denver meetings.
Non-Native Invasive Plant Species	The Vegetation Management section of Alternative D clarify that BMPs (with respective citation/appendix reference) will be applied to all types of construction projects in sagebrush habitats.	<b>No change made.</b> The comments didn't include any BMPs to consider. There are already RDFs for fluid, non-energy leasables, and locatables, and some have been added for ROWs. In addition, there are many stipulations for mineral materials, Rec, travel, etc. Plus, MA-GRSG-7 addresses the need to additional site-specific mitigation.

COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Sagebrush Removal	We...recommend adding a management action to avoid sagebrush removal in winter and breeding habitats unless otherwise biologically justified--in part utilizing the Connelly et al. (2000) and Hagen et al. (2007) guidelines. Exceptions should also consider the need for ecosystem management, including the conservation of other special status species.	MA-VEG-1
Grazing	1) Including a specific management decision to develop an educational component for grazing permittees;	No change made. This is not an RMP decision.
Grazing	2) addressing drought in habitat objectives and apply BLM IM No. 2013-094 and similar USFS guidance on FS lands;	MA-GRA-3 – RMPs do not tier to IMs.
Grazing	3) including specific discussion of the timeline for allotment habitat assessments (minimally a rotation of fewer than ten years) and the process by which adjustments in grazing management could be implemented;	No change made. This was discussed in our 6/27 coordination meeting. Timelines are not RMP decisions.
Grazing	4) including a commitment to ensure that all allotments located within PPMA have a current land health assessment. For those allotments that do not have a current assessment, we recommend prioritizing these for completion.	No change made. What is "current"? Rangeland Health Standards are evaluated prior to making term permit renewals. Can change MA-GRA-3 to note that monitoring and management actions would be focused...
Pinyon-Juniper Expansion	1) The selected alternative should include a no net gain commitment for juniper stands in phase 1 and 2 state of incursion in GRSG seasonal habitats with a target of removing all pinyon-juniper incursions;	Objective-GRSG-2; MA-VEG-1
Pinyon-Juniper Expansion	2) The selected alternative should include a commitment to a zero percent pinyon juniper incursion within 1kilometer (0.6 miles) of leks (Baruch-Mordo et al. 2013). An old-growth exception to the conservation measure should be included; if the lek is within 0.6 miles of an old growth pinyon-juniper stand the old growth should be retained for its value to the ecosystem and other species. Please include a management decision that describes the factors that will be used to determine what constitutes old growth juniper;	MA-VEG-1
Pinyon-Juniper Expansion	3) The selected alternative should include a management action, objective, or desired future condition for the elimination or reduction of juniper canopy cover to a maximum 5 percent cover (Freese 2009, Cassaza et al. 2010, Baruch-Mordo et al. 2013);	Objective-GRSG-2 points to this issue. In December and January, BLM, FS, and FWS talked about this and the potential difficulties with monitoring such an objective as FWS proposed.
Pinyon-Juniper Expansion	4) We recommend prioritizing areas for treatment based on the potential to improve or restore GRSG habitats (e.g., phase 1 or 2 state of incursion), with specific emphasis on lek sites, nesting habitats, and brood rearing habitats (Freese 2009, Casazza et al. 2010, Baruch-Mordo et al. 2013); and monitoring the long-term success of these prioritized sites;	MA-VEG-1
Pinyon-Juniper Expansion	5) prioritize mechanical removal of juniper as the preferred treatment method. If fire is being considered for juniper removal, we recommend BLM include a risk analysis (i.e. develop criteria) to evaluate whether the use of fire for juniper removal will potentially spread non-native invasive plants (see COT Crosswalk Comments, Fire, #2);	MA-VEG-1; MA-FIRE-3
Pinyon-Juniper Expansion	6) include specifics for how the BLM/FS will monitor the success of pinyon-juniper removal projects should be addressed in the final EIS.	Updated the monitoring appendix with the NPT recommended Monitoring Framework.
Range Management Structures	We recommend that either Alternative C is selected or Alternative D be expanded to apply conservation measures for range management structures to all GRSG habitat in PPMA.	All the grazing management actions apply to all GRSG habitat within PPMA.

COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Fences	The COT report (option 1) recommends marking existing fences within high risk areas of collision (e.g., 1.2 miles of leks). We also recommend a 1.25 mile exclusion buffer for construction of new fences, particularly when fence densities in the area exceed 1.0 km/km <sup>2</sup> ) (Stevens 2012; also see Table 1, above). However, we acknowledge there may be scenarios where placement of fences is necessary to improve or enhance GRSG habitat (e.g. around springs or riparian areas, etc.). Therefore, we recommend that existing fences or newly constructed fences (installed for the benefit of GRSG), within 1.25 of a lek be marked using established methodology (NRCS 2012).	MA-GRA-17
Fences	We also recommend that you include the use of the NRCS fence collision risk tool (NRCS 2012), but also include our recommendations from Fences, #1, above;	MA-GRA-17
Fences	Consider prioritizing, and removing or avoiding the placement of fences in all GRSG habitats, particularly where bird collisions with the fence are documented or in flat terrain (Stevens 2012). Published research to date is limited to breeding habitats. Unpublished reports suggest sage-grouse fence collisions occur in other seasonal habitats including late brood rearing habitat and winter concentration areas (NRCS 2012).	MA-GRA-17
Recreation	We recommend you add language (from Alternative C, MA-REC-2 and MA-TTM-7) that excludes campground facilities, dispersed camping and non-motorized recreation (seasonally, during the lekking period), and prohibits new route construction within 4 miles of a lek in PPMA.	No change made. There is insufficient scientific evidence that this is needed to address threats described in the COT Report, 2010 listing, or DEIS.
Recreation	We recommend it include a timeline for completion of all travel management plans and	No change made. This was discussed in our 6/27 coordination meeting. Timelines are not RMP decisions, though MA-TTM-3 addresses regularly updating a prioritization timeline and MA-TTM-4 establishes priorities for completing transportation planning.
Recreation	Add the following management decision: Limit roads to less than 0.09 kilometers/kilometer <sup>2</sup> (Wisdom et al. 2011) in GRSG habitats in PPMA. This density should apply to new and existing roads, and if existing road density is above the recommended limits the existing roads should be closed or rerouted to the extent possible.	No change made. Discussed this issue in Portland. Wisdom et. al. used a specific data set of roads that is far less detailed than what is truly on the ground. Applying thresholds that are based on an incomplete data does not reflect the on-the-ground effects. Several TTM management actions address limiting route density.
Recreation	Include protection of other seasonal sage grouse habitats (i.e., brood rearing, and wintering) by minimizing the development of new recreational facilities. However, we also recommend adding a management decision that allows the consolidation of otherwise dispersed recreation sites. This may require some additional limited development of campgrounds or picnic areas but would overall reduce dispersed effects to GRSG and their habitats, thus benefiting the species in site-specific circumstances.	MA-REC-2
Energy	1) NSO stipulations are applied to new leases in GRSG habitat within PPMA. The proposed CSU stipulations for Alternative D state that PPMA outside of 4 miles of a lek include noise, tall structure, and timing restrictions. As discussed above, your proposed implementation of noise and seasonal stipulations appears to be applied only to initial construction activities, which would provide insufficient protection to GRSG habitats from long-term operation of energy facilities. It is important that protection of all important PPMA habitats applies to the long-term operation of energy facilities, and is not limited to initial construction activities;	MA-MIN-18. All PPMA would be managed as NSO.

COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Energy	2) Permit Conditions of Approval (COA) are applied to existing fluid mineral leases that were issued without adequate stipulations for the protection of GRSG or their habitats. The COAs, including timing and CSU restrictions and appropriate Required Design Features (RDF), are applied to existing leases to eliminate or minimize surface-disturbing and disruptive activities within and adjacent to important nesting and brood-rearing habitat and winter concentration areas. We recommend these mechanisms be used to: a) preclude new surface occupancy (e.g., well pads, associated structures, roads) in GRSG habitats within PPMA (exceptions could apply as per Alternative B in MA-MIN-22); b) preclude new surface occupancy in all habitat types within 1 mile of leks within PPMA; c) apply noise, tall structure, and timing restrictions within all GRSG habitats in PPMA; and d) utilize BLM/FS authority to move well pads and other ancillary facilities to the extent necessary per the Yates court decision to ensure no new well pads for existing leases are constructed within the 1 mile lek buffer regardless of habitat type (not just a timing restriction on pad construction/drilling, but a year-round restriction on new pad siting/construction). We believe that our recommended stipulations on existing leases constitute reasonable measures to minimize adverse effects to GRSG while maintaining flexibility in planning future development;	MA-MIN-20 though MA-MIN-28, as well as MA-MIN-2  In the FWS letter, the following note is included: The Yates Petroleum Corp. (2008) decision states, "when making a decision regarding discrete surface-disturbing oil and gas development activities following site-specific environmental review, BLM has the authority to impose reasonable measures to minimize adverse impacts on other resource values, including restricting the siting or timing of lease activities."  In other public comments, additional information related to the Yates decision was provided: "in Yates, the IBLA merely affirmed the imposition of an additional COA based on site-specific information including recent and directly applicable scientific research. Yates, 176 IBLA at 157; William P. Maycock, 177 IBLA 1, 16-17 (2009). The Yates decision does not stand for the proposition that BLM can impose COAs whenever it deems necessary or in broad programmatic documents such as the Sage-grouse DLUPA. Rather, in Yates, the IBLA merely affirmed the imposition of an additional COA based on site-specific information including recent and directly applicable scientific research. See Conner v. Burford, 84 F.2d 1441, 1449-50 (9th Cir. 1988); 43 C.F.R. § 3101.1-2 (BLM can impose only "reasonable mitigation measures...to minimize adverse impacts...to the extent consistent with lease rights granted").
Energy	3) We recommend that a density (calculated as an average across PPMA habitats) of no more than 1 disturbance per section (640 acres) for existing and new fluid mineral development leases (e.g., one pad or one compressor station or one centralized water facility) should be incorporated into the FEIS as a standard Condition of Approval for existing leases. Well densities of 8 pads per square mile have been shown to exceed the species threshold of tolerance (Holloran 2005, Walker et al. 2007, Doherty et al. 2008) and GRSG breeding populations and lek attendance respond negatively when well pad densities exceeded 1 pad per square mile (Holloran 2005, Naugle et al. 2011). Our recommended disturbance density would also result in the clustering of surface disturbances, thereby minimizing fragmentation of habitats.	MA-MIN-2
Free Roaming Equid Mgmt.	From the letter: Conduct an analysis of the current AMLs to determine if they maintain suitable GRSG habitat parameters.	MA-WHB-4
Free Roaming Equid Mgmt.	We recommend selecting Alternatives B or C with the following revisions: 1) Include a commitment to support additional research to quantitatively determine impacts of wild horses and burros on sage-grouse habitat parameters;	<b>No change made.</b> Commitments to support research are not RMP decisions. MA-WHB-4, MA-WHB-3, and MA-WHB-1 get at this issue without adding a non-RMP decision.
Free Roaming Equid Mgmt.	2) add a commitment to consider drought conditions when establishing AMLs;	<b>No change made.</b> RMPs are not the place to establish AML criteria. BLM has a drought policy that is already referenced in the Proposed Plan (MA-GRA-7).
Free Roaming Equid Mgmt.	3) Include a measure to develop scientific procedures that can be replicated to count horses so that proper management actions can be implemented when numbers exceed AMLs; and	<b>No change made.</b> RMPs do not scientific procedures.
Free Roaming Equid Mgmt.	4) Commit to a comprehensive monitoring program with prescriptive management triggers to conserve GRSG and the species habitat;	Updated the monitoring appendix with the NPT recommended Monitoring Framework. Also added adaptive management triggers. Plus, Standards for Rangeland Health, addressed in the grazing section, apply to all land uses, included horses.
Free Roaming Equid Mgmt.	5) Specifically identify the processes (i.e., HMAs, NEPA) through which management activities will be considered and implemented (i.e., from Alternative B—MA-WHB-3, MA-WHB-4, MA-WHB-6).	<b>No change made.</b> An RMP does not identify processes through which management actions will be implemented. It identifies the management actions to be implemented.

COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Mining	Alternative D could be modified as follows: 1) implement a 4-mile lek buffer exclusion area for all surface mining to provide assurance that mines will not be placed in seasonally-important habitats near leks;	Applied recommendations from NPT related to mining, plus a closure to protect leks and adjacent habitats (1 mile) – MA-MIN-3; MA-MIN-15. This is a closure to new mines, unless they are a free-use site (mineral materials), or are adjacent to existing operations. There are problems applying this same approach with coal and locatables, since they operate under different laws.
Mining	2) Add noise restrictions for all GRSG habitats in PPMA, i.e., leks, nesting, wintering, brood-rearing, and transition habitats (see General Comment section). Noise restrictions should apply to initial construction and long-term operation of project facilities.	MA-GRSG-3
Mining	3) include a requirement of restoration of all GRSG habitats in PPMA regardless of the existing percent surface disturbance	Objective-GRSG-3; MA-GRSG-7
Mining	5) (no 4 in the comments) include a specific commitment to discontinue leasing if needed to ensure successful restoration of prior disturbances;	Objective-GRSG-3; MA-MIN-3; MA-MIN-7
Mining	6) include a commitment that GRSG populations exist for restoration to be considered successful; and	<b>No change made.</b> Discussed in various meetings, as well as in Portland and Denver with the other sub-regions. We are managing the habitat. We did include occupancy as one of the two components of no longer being considered “disturbed” but not the sole piece.
Mining	7) include provisions specifically for abandoned mine reclamation.	<b>No change made.</b> Reclamation of abandoned mines is not an RMP decision. It is a health and safety issue that has its own program with the bureau.
Ex-Urban Development/Urbanization	Exclude new infrastructure from all important GRSG habitats within PPMA unless it can be demonstrated by the BLM/FS that these corridors will have no impacts on the maintenance of neutral or positive GRSG population trends and habitats.	Per recommendation from the NPT, adopted avoidance areas for ROWs in all PPMA.
Ex-Urban Development/Urbanization	Add a minimum 1-mile lek buffer exclusion area for all ROWs.	MA-LAR-2
Ex-Urban Development/Urbanization	Apply noise restrictions within all important seasonal GRSG habitats in PPMA (i.e., lek, nesting, wintering, brood-rearing, and transition habitats).	MA-GRSG-3
Infrastructure	We believe that Alternative D (primarily yellow) could meet this conservation objective with the following modifications: 1) exclude new infrastructure from all seasonal GRSG habitats within PPMA unless it can be demonstrated that a corridor would have no impacts on the maintenance of neutral or positive GRSG population trends and habitats;	Per recommendation from the NPT, adopted avoidance areas for ROWs in all PPMA.
Infrastructure	2) add a 1-mile lek buffer exclusion area (habitat and non-habitat) for all ROWs;	MA-LAR-2
Infrastructure	3) Require new power lines to be buried or modified (e.g., constructed in a way that reduces or eliminates nesting and perching by avian predators or collisions by GRSG) in all GRSG habitat within PPMA.	MA-LAR-2, MA-GRSG-3
Infrastructure	4) include mitigation for both direct and indirect impacts with GRSG occupancy as a primary success criteria;	<b>No change made.</b> Discussed in various meetings, as well as in Portland and Denver with the other sub-regions. We are managing the habitat. We did include occupancy as one of the two components of no longer being considered “disturbed” but not the sole piece. MA-GRSG-7 addresses mitigation.
Infrastructure	5) add a stipulation (in the Lands and Realty section of the EIS) that provides specific measures to ensure that roads associated with infrastructure corridors are closed or limited for public use;	Not addressed specifically, because there may be instances where this isn't the least impacting approach for GRSG. The concept is addressed in MA-LAR-2; MA-LAR-3; MA-TTM-3.
Infrastructure	6) include in the Lands and Realty section specific commitment to removal or decommissioning of roads associated with infrastructure in GRSG habitats;	Not addressed specifically, because there may be instances where this isn't the least impacting approach for GRSG. The concept is addressed in MA-LAR-2; MA-LAR-3; MA-TTM-3.



COT Issue	FWS COT Cross-Walk Recommendation	BLM Proposed Plan Action/Notes
Infrastructure	7) add a commitment to use available methods to restrict nesting and perching by avian predators in all seasonal GRSG habitats; and	MA-GRSG-3, but is tied to breeding and nesting habitats.
Infrastructure	8) Apply noise restrictions within all GRSG habitats (i.e, lekking, nesting, brood-rearing, wintering, transition) within PPMA. Noise restrictions should apply to initial construction and long-term operation of project facilities.	MA-GRSG-3
Infrastructure	9) Apply a minimum 4-mile lek exclusion buffer for compressor stations because of their associated size and noise levels.	<b>No change made.</b> Between the noise restrictions (MA-GRSG-3), the 1/640 requirement (MA-MIN-2), the disturbance threshold (Objective-GRSG-3), and the ROW allocations (MA-LAR-2), there is really no need for a specific action only for compressor stations. All these actions address the size and noise threats.
Infrastructure	10) Provide management decisions to ensure that roads associated with infrastructure corridors are closed or limited for public use.	Same as Infrastructure #5 above.
Infrastructure	From the Letter: Please review MA-LAR-3 for Alternative D, which states that additional mitigation will be implemented [only] if the disturbance exceeds 5 percent. We believe this is inconsistent with MA-GRSG-9, which appropriately mitigates for all disturbances regardless of disturbance cap.	That language was removed. All action would be required to comply with Objective-GRSG-3 and MA-GRSG-7, both of which address no-net-unmitigated loss in PPMA and PGMA, as well as mitigation of impacts.
PACs	The selected Alternative B, C, or D should include: 1) The Anthro Mountain and West Tavaputs areas in northeastern Utah as PPMA;	MA-GRSG-1 and associated map. They are PPMA in the proposed plan.
PACs	2) The entirety of the Bald Hills and Panguitch areas as PPMA;	MA-GRSG-1 and associated map. Through explanations and discussions of biological rationale, some of the Bald Hills area is still PGMA. All Panguitch area is PPMA.
PACs	3) a commitment to incorporate available scientific literature (e.g., Connelly et al. 2000, Hagen et al. 2007) in the restoration of GRSG habitat;	Objective-GRSG-2
PACs	4) a commitment that GRSG occupy an area for restoration to be consider successful;	<b>No change made.</b> Discussed in various meetings, as well as in Portland and Denver with the other sub-regions. We are managing the habitat. We did include occupancy as one of the two components of no longer being considered "disturbed" but not the sole piece. MA-GRSG-7 addresses mitigation.
PACs	5) a collaborative approach to fuels management and landscape scale conservation which should increase effectiveness of habitat restoration; and	Objective-GRSG-2; Objective-GRSG-5; MA-FIRE-1; MA-FIRE-3
PACs	6) a comprehensive monitoring framework and an adaptive management framework, which we understand are in development;	Updated the monitoring appendix with the NPT recommended Monitoring Framework, and have developed the adaptive management triggers. Still working on identifying the management response if a hard trigger is tripped.
PACs	6) (duplicated in the comment letter) consideration of a 3 percent disturbance cap in PPMA.	Proposed plan adopts a 3% disturbance objective with fire considered in the equation by affecting habitat availability (denominator). Consistent with regional coordination in Portland and Denver meetings.

## Brent Ralston

---

**From:** Gardetto, Jessica  
**Sent:** Wednesday, July 02, 2014 12:37 PM  
**To:** Peggy Hallman  
**Cc:** Brent Ralston  
**Subject:** Fwd: Letters for Tim's Signature  
**Attachments:** 7.2.14\_LTR to Cooperating Agency\_FEIS\_review Ralston.docx; 7.2.14\_Ltr to Tribes for the Draft EIS\_pckg.docx; CA\_agencies\_mailing\_FEIS\_letter\_4.24.14.doc

IDMT\_PUB\_9826  
3.3

Hi Peggy,

Since Kathy is out, are you able to help us get these letters sent out? I have also attached the mailing list for creating labels. Thank you so much!

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

----- Forwarded message -----

From: **Gardetto, Jessica** <[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)>  
Date: Wed, Jul 2, 2014 at 12:09 PM  
Subject: Letters for Tim's Signature  
To: Kathy Mondor <[kmondor@blm.gov](mailto:kmondor@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>

Hi Kathy,

Here are the two letters for the sage-grouse draft plan package, which we will be sending along with the package to cooperating agencies and tribes.

So, are we good to go for Tim's signature? Of course, since you are so good at editing/catching any mistakes, if you want to read through these really quickly, I'd appreciate it!

Of course, let me know if you need any help from me. Thank you so much!

Jessica Gardetto  
Office of Communications  
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(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



In Reply Refer To:  
1610 (ID910)

Dear Cooperating Agency:

The BLM and Forest Service (FS) in the Idaho and Southwestern Montana Sub Region have prepared an administrative draft proposed plan (ADPP). Due to your involvement with BLM for this effort, you have an opportunity to provide feedback on this ADPP before it is published in the Proposed Plan/Final Environmental Impact Statement (FEIS). The BLM Preliminary Proposed Plan goals, objectives, management actions, associated maps and supporting appendices are enclosed for your cooperating agency review. The USFS Preliminary Proposed Plan Amendments will be included in the Final EIS/LUPA, but are not included at this time for review as they are still under development. Enclosed is a CD with the applicable electronic files for review and associated directions and comment form.

Please make any comments electronically within the comment form and upon completion of your review please send them electronically, preferably via email to:

Brent Ralston at [bralston@blm.gov](mailto:bralston@blm.gov)

In order to meet the timeline for providing our Final EIS/LUPA to the U.S. Fish and Wildlife Service, we ask that you review these documents and provide your comments and input back to us by July 18, 2014. We realize this is a short timeframe and we apologize for the inconvenience. Providing information regarding the consistency of the Preliminary Proposed Plan Amendment with your respective federal, Tribal, State or County plans will present a useful, accurate response from your perspective and will allow us to specifically address any inconsistencies in the Final EIS.

Please remember these are not public documents and are being provided for your review based on your Cooperating Agency relationship with the BLM. We request that you maintain the confidentiality of these documents throughout your review until the BLM and USFS release this information to the public.

If you have any questions, contact Brent Ralston (BLM Idaho) at (208) 373-3812. Thank you in advance for your review and input throughout this planning process; we look forward to receiving your comments.

Sincerely,

Timothy M. Murphy  
Acting Idaho State Director  
Bureau of Land Management



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Idaho State Office  
1387 South Vinnell Way  
Boise, Idaho 83709-1657



In Reply Refer To:  
1610 (ID910)

Nathan Small, Tribal Chairman  
Shoshone-Bannock Tribes  
PO Box 306  
Fort Hall, ID 83203

Dear Chairman Small:

The BLM and Forest Service (FS) in the Idaho and Southwestern Montana Sub Region have prepared an administrative draft proposed plan (ADPP). Due to your involvement with BLM for this effort, you have an opportunity to provide feedback on this ADPP before it is published in the Proposed Plan/Final Environmental Impact Statement (FEIS). The BLM Preliminary Proposed Plan goals, objectives, management actions, associated maps and supporting appendices are enclosed for your review. The USFS Preliminary Proposed Plan Amendments will be included in the Final EIS/LUPA, but are not included at this time for review as they are still under development. Enclosed is a CD with the applicable electronic files for review and associated directions and comment form.

Please make any comments electronically within the comment form and upon completion of your review, please send them electronically, preferably via email to:  
Brent Ralston at [bralston@blm.gov](mailto:bralston@blm.gov)

We request that you provide specific information regarding the consistency of the ADPP with your respective Tribal Plans and Tribal rights and interests; noting any inconsistencies you feel may exist. This will allow us to specifically address your comments and concerns as we develop the Final EIS.

This review precedes release to the public. As such, these are not public documents and are being provided for your review based on your unique status and governmental relationship with the BLM. We request that you maintain the confidentiality of these documents throughout your review until the BLM and USFS release this information to the public.

If you have any questions, contact Brent Ralston (BLM Idaho) at (208) 373-3812. Thank you in advance for your review and input throughout this planning process; we look forward to receiving your comments.

Sincerely,

Timothy M. Murphy  
Acting Idaho State Director  
Bureau of Land Management

Dennis D. Crane, Chairman  
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Cassia County Courthouse  
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Blaine County Commissioners  
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Jerald Raymond, Chairman  
Jefferson County Commissioners  
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Rigby, Idaho 83442

R.E. Cope  
Lemhi County Commissioners  
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Idaho Association of Counties  
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Craters of the Moon National Monument  
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Jeff Burwell and Karen Fullen  
Natural Resources Conservation Service  
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Wayne Butts, Chairman  
Custer County Commissioners  
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Ryan Tingey, Commission Chair  
Box Elder County Commissioners  
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Idaho Governor's Office of Species Conservation  
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Rebecca Nourse, Forest Supervisor  
Sawtooth National Forest  
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Twin Falls, ID 83301-7976

Don Kemner  
Idaho Department of Fish and Game  
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David R. Myers, Forest Supervisor  
Beaverhead-Deerlodge National Forest  
420 Barrett St.  
Dillon, MT 59725-3572

Chuck Mark, Forest Supervisor  
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Lapwai, ID 83540

Duck Valley Shoshone-Paiute Tribe  
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Owyhee, NV 89832

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Spirit Talk Culture Institute  
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East Glacier, In the Blackfoot Nation 59434-0477

Shoshone-Bannock Tribes  
Chairman  
PO Box 306  
Fort Hall, ID 83203

Confederated Salish & Kootenai Tribes  
42487 Complex Blvd.  
PO Box 278  
Pablo, Montana 59855



STATE BOARD OF LAND COMMISSIONERS  
February 17, 2015  
Information Agenda

SUBJECT

IDL Proposed Greater Sage-Grouse Conservation Plan

BACKGROUND

Greater Sage-grouse (sage-grouse) is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan to be considered by the BLM in the EIS alternative analysis. It now appears that much of the Idaho Plan will become the BLM's Preferred Alternative for management of BLM's lands in Idaho.

As part of Idaho's commitment to conserving sage-grouse, the Idaho Department of Lands (IDL) has developed draft Conservation Measures for Endowment Trust Land management programs and for Regulatory and Assistance programs that complement the Governor's Sage-grouse Plan for federal land management in Idaho.

DISCUSSION

In October 2014, the IDL Director Tom Schultz established a working group which consisted of various IDL staff which oversee programs that could be affected by the listing of the sage-grouse. This group held regular meetings over the last three months to develop recommended conservation measures as part of IDL's *Proposed Greater Sage-Grouse Conservation Plan* based on the group's review of the science and what other western states are proposing. The conservation measures were also designed to be complementary to BLM's Preferred Alternative for Idaho.

Attachment 1 is IDL's *Proposed Greater Sage-Grouse Conservation Plan*. For proposed activities by third parties on state endowment trust lands, IDL will implement sage-grouse conservation measures as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities, conservation measures will be voluntary best management practices (BMP's) on private land because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: Abandoned Mine Lands Projects; Dredge and Placer Mine Permits; Mine Reclamation Plan Approvals; and Oil and Gas Permits (seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended best management practices within its authorizing documents to encourage compliance.

Additionally, for some fire programs, IDL will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

IDL is planning to bring the *Proposed Greater Sage-Grouse Conservation Plan* back to the Land Board for approval at the regularly scheduled meeting in March. In the meantime, IDL will be conducting several stakeholder outreach meetings to gather feedback on the document from industry, other governmental agencies and several non-governmental organizations.

#### ATTACHMENTS

1. Draft IDL Proposed Greater Sage-Grouse Conservation Plan

**DEPARTMENT OF THE INTERIOR**

**Bureau of Land Management**

[LLWO2100000  
 L11100000.DQ0000.LXSISGST0000]

**Notice of Availability of the Great Basin Region Greater Sage-Grouse Proposed Land Use Plan Amendments and Final Environmental Impact Statements for the Sub-Regions of Idaho and Southwestern Montana; Nevada and Northeastern California; Oregon; and Utah**

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of availability.

**SUMMARY:** In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, and the Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976 (NFMA), the Bureau of Land Management (BLM) and U.S. Forest Service (Forest Service) have prepared Proposed Land Use Plan Amendments (LUPA) and Final Environmental Impact Statements (EISs) for planning units in Idaho, Southwestern Montana, Nevada, Northeastern California, Oregon, and Utah. There are four separate Final EISs being conducted in the Great Basin Region and this notice announces the availability of all four.

**DATES:** BLM planning regulations state that any person who meets the conditions as described in the regulations may protest the BLM's and Forest Service's Proposed LUPA/Final EIS. A person who meets the conditions and files a protest must file the protest within 30 days of the date that the Environmental Protection Agency publishes its Notice of Availability in the **Federal Register**. In accordance with 36 CFR 219.59, the Forest Service will waive its objection procedures of this subpart and instead adopt the BLM's protest procedures outlined in 43 CFR 1610.5-2.

**ADDRESSES:** Copies of the Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah Greater Sage-Grouse Proposed LUPAs/Final EISs have been sent to affected Federal, State and local government agencies, tribal governments, and to other stakeholders and members of the public who have requested copies. Copies of the Proposed LUPAs/Final EISs are available for public inspection at the addresses listed in the **SUPPLEMENTARY INFORMATION** section. Interested persons

may also review the Proposed LUPAs/ Final EISs on the internet at <http://www.blm.gov/wo/st/en/prog/more/sagegrouse.html>.

All protests must be in writing and mailed to one of the following addresses:

Regular Mail: BLM Director (210), Attention: Protest Coordinator, P.O. Box 71383, Washington, DC 20024-1383.

Overnight Delivery: BLM Director (210), Attention: Protest Coordinator, 20 M Street SE., Room 2134LM, Washington, DC 20003.

**FOR FURTHER INFORMATION CONTACT:** *For the Idaho and Southwestern Montana Greater Sage-Grouse Proposed LUPA/ Final EIS:* Jonathan Beck, BLM Idaho State Office GRSG Planning Lead, telephone 208-373-4070; address 1387 South Vinnell Way, Boise, ID 83709; email [jmbeck@blm.gov](mailto:jmbeck@blm.gov).

*For the Nevada and Northeastern California Greater Sage-Grouse Proposed LUPA/Final EIS:* Lauren Mermejo, BLM Nevada State Office GRSG Project Lead, telephone 775-861-6580; address 1340 Financial Boulevard, Reno, NV 89502; email [lmermejo@blm.gov](mailto:lmermejo@blm.gov).

*For the Oregon Greater Sage-Grouse Proposed LUPA/Final EIS:* Joan Suther, BLM Oregon State Office GRSG Planning Lead, telephone 541-573-4445; address BLM Burns District, 28910 Hwy 20, West Hines, OR 97738; email [jsuther@blm.gov](mailto:jsuther@blm.gov).

*For the Utah Greater Sage-Grouse Proposed LUPA/Final EIS:* Quincy Bahr, BLM Utah State Office GRSG Project Lead, telephone 801-539-4122; address 440 West 200 South, Suite 500, Salt Lake City, UT 84101-1345; email [qfbahr@blm.gov](mailto:qfbahr@blm.gov).

Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individuals during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The BLM and Forest Service prepared the Idaho and Southwestern Montana, Nevada and Northeastern California, and Utah Greater Sage-Grouse LUPAs and EISs. The Oregon LUPA/EIS was prepared solely by the BLM because there were no National Forest System lands involved. All four of these Proposed LUPAs/Final EISs address a range of alternatives focused on specific conservation measures across the range of the Greater Sage-Grouse (GRSG). All four of these EISs are part of a total of 15 separate EISs that make up the BLM

and Forest Service National Greater Sage-Grouse Planning Strategy. These four EISs will amend the following BLM Resource Management Plans (RMPs) and Management Framework Plans (MFPs) and Forest Service Land and Resource Management Plans (LRMP) in the Great Basin Region:

**California**

- Alturas RMP (2008)
- Eagle Lake RMP (2008)
- Surprise RMP (2008)

**Idaho**

- Birds of Prey NCA RMP (2008)
- Bruneau RMP revision (and existing 1983 Bruneau MFP)
- Challis RMP (1999)
- Craters of the Moon NM RMP (2006)
- Four Rivers RMP revision (and existing 1988 Cascade RMP and 1983 Kuna and Bruneau MFPs)
- Jarbidge RMP revision (and existing 1987 Jarbidge RMP)
- Lemhi RMP (1987)
- Owyhee RMP (1999)
- Pocatello RMP revision
- Shoshone-Burley RMP revision (and existing 1980 Bennett Hills/ Timmerman Hills, 1985 Cassia, 1975 Magic, 1985 Monument, 1981 Sun Valley, and 1982 Twin Falls MFPs/RMPs)
- Upper Snake RMP revision (and existing 1983 Big Lost, 1985 Medicine Lodge, 1981 Big Desert, and 1981 Little Lost-Birch Creek MFPs/RMPs)
- Boise National Forest, LRMP (2003)
- Curlew National Grassland Management Plan, LRMP (2002)
- Caribou National Forest, Revised LRMP (2003)
- Caribou-Targhee National Forest, Targhee National Forest LRMP (1997)
- Salmon-Challis National Forest, Challis National Forest LRMP (1987)
- Salmon-Challis National Forest, Salmon National Forest LRMP (1988)
- Sawtooth National Forest, Revised LRMP (2003)

**Montana**

- Dillon RMP (2006)
- Beaverhead-Deerlodge National Forest, LRMP (2009)

**Nevada**

- Battle Mountain RMP revision (and existing 1997 Tonopah and 1986 Shoshone-Eureka RMPs)
- Black Rock Desert-High Rock Canyon NCA RMP (2004)
- Carson City RMP revision (and existing 2001 Carson City Consolidated RMP)
- Elko RMP (1987)
- Ely RMP (2008)

- Wells RMP (1985)
- Winnemucca RMP revision (and existing 1982 Paradise-Denio MFP and 1982 Sonoma-Gerlach RMP)
- Humboldt National Forest, LRMP (1986)
- Toiyabe National Forest, LRMP (1986)

### Oregon

- Andrews RMP (2005)
- Baker RMP revision (and existing 1989 Baker RMP)
- Brothers-LaPine RMP (1989)
- Lakeview RMP amendment (and existing 2003 Lakeview RMP)
- Southeastern Oregon RMP amendment (and existing 2003 Southeastern Oregon RMP)
- Steens RMP (2005)
- Three Rivers RMP (1992)
- Upper Deschutes RMP (2005)

### Utah

- Box Elder RMP (1986)
- Cedar/Beaver/Garfield/Antimony RMP (1986)
- Grand Staircase-Escalante National Monument Management Plan (2000)
- House Range RMP (1987)
- Kanab RMP (2008)
- Park City MFP (1975)
- Pinyon MFP (1978)
- Pony Express RMP (1990)
- Price RMP (2008)
- Randolph MFP (1980)
- Richfield RMP (2008)
- Salt Lake District Isolated Tracts Planning Analysis (1985)
- Vernal RMP (2008)
- Warm Springs RMP (1987)
- Dixie National Forest, LRMP (1986)
- Fishlake National Forest, LRMP (1986)
- Uinta National Forest, Revised LRMP (2003)
- Wasatch-Cache National Forest, Revised LRMP (2003)
- Ashley National Forest, LRMP (1986)
- Manti-La Sal National Forest, LRMP (1986)

Management decisions made as a result of these Proposed LUPAs/Final EISs will apply only to BLM-administered and National Forest System lands in the planning area. The planning areas for all four EISs includes approximately 194.0 million acres of BLM, National Park Service, Forest Service, U.S. Bureau of Reclamation, State, tribal, local, and private lands located in 28 Idaho counties (Ada, Adams, Bear Lake, Bingham, Blaine, Bonneville, Butte, Camas, Caribou, Cassia, Clark, Custer, Elmore, Fremont, Gem, Gooding, Jefferson, Jerome, Lemhi, Lincoln, Madison, Minidoka, Oneida, Owyhee, Payette, Power, Twin Falls, and Washington), 7 Montana counties

(Montana, Beaverhead, Deer Lodge, Fremont, Clark, Madison, and Silver Bow), 16 Nevada counties (Carson City, Churchill, Douglas, Elko, Esmeralda, Eureka, Humboldt, Lander, Lincoln, Lyon, Mineral, Nye, Pershing, Storey, Washoe, and White Pine), 5 California counties (Lassen, Modoc, Plumas, Siskiyou, and Sierra), 8 Oregon counties (Baker, Crook, Deschutes, Grant, Harney, Lake, Malheur, and Union), 24 Utah counties (Beaver, Box Elder, Cache, Carbon, Daggett, Duchesne, Emery, Garfield, Grand, Iron, Juab, Kane, Morgan, Piute, Rich, Sanpete, Sevier, Summit, Tooele, Uintah, Utah, Wasatch, Wayne, and Weber), and 2 Wyoming counties (Sweetwater and Uinta). The decision area for these Proposed LUPAs/Final EISs is defined as those BLM-administered and National Forest System lands and Federal mineral estate within the following habitat management categories:

- Priority Habitat Management Area (PHMA)—Areas identified as having the highest conservation value for maintaining sustainable GRSG populations; includes breeding, late brood-rearing, and winter concentration areas.

- Important Habitat Management Area (IHMA) (applicable to Idaho only)—Areas identified as having generally moderate to high conservation value habitat and/or populations that provide a management buffer for the PHMA and to connect patches of PHMA.

- General Habitat Management Area (GHMA)—Areas of seasonal or year-round GRSG habitat outside of PHMAs.

The Notice of Intent (NOI) to prepare the Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah Greater Sage-Grouse LUPAs/EISs was published in the **Federal Register** on December 9, 2011. A Notice of Availability (NOA) for the Idaho and Southwestern Montana, Nevada and Northeastern California, and Utah Draft LUPAs/EISs was published in the **Federal Register** on November 1, 2013. The Oregon Draft LUPA/EIS was released to the public on November 26, 2013. Comments on the Draft LUPAs/EISs received from the public and internal BLM and Forest Service review were considered and incorporated, as appropriate, into the Proposed Plan.

The alternatives presented in Proposed LUPAs/Final EISs are described below:

- Alternative A would retain the current management goals, objectives and direction specified in the existing

BLM RMPs and the Forest Service LRMPs.

- Alternative B is based on the conservation measures developed by the National Technical Team (NTT) planning effort in Washington Office Instructional Memorandum (IM) Number 2012–044. As directed in the IM, the conservation measures developed by the NTT must be considered and analyzed, as appropriate, through the land use planning process and NEPA by all BLM state and field offices that contain occupied GRSG habitat. Most management actions included in Alternative B would be applied to PHMA.

- Alternative C is based on a citizen groups' recommended alternative. This alternative emphasizes improvement and protection of habitat for GRSG and is applied to all occupied GRSG habitat. Alternative C would limit commodity development in areas of occupied GRSG habitat, and would close or designate portions of the planning area to some land uses. The Utah LUPA/Draft EIS combined this alternative with Alternative F (discussed below).

- Alternative D, which was identified as the Preferred Alternative in the Draft EIS, balances opportunities to use and develop the planning area and protects GRSG habitat based on scoping comments and input from Cooperating Agencies involved in the alternatives development process. Protective measures would be applied to GRSG habitat.

- Alternative E is the alternative provided by the State or Governor's offices for inclusion and analysis in the EISs. It incorporates guidance from specific State Conservation strategies and emphasizes management of greater sage-grouse seasonal habitats and maintaining habitat connectivity to support population objectives. This alternative was identified as a co-Preferred Alternative in the Idaho and Southwestern Montana Draft EIS.

- Alternative F is also based on a citizen group recommended alternative. This alternative emphasizes improvement and protection of habitat for GRSG and defines different restrictions for PHMA and GHMA.

Alternative F would limit commodity development in areas of occupied GRSG habitat, and would close or designate portions of the planning area to some land uses. This alternative does not apply to the Utah sub-regional planning effort, as it was combined with Alternative C.

- The Proposed LUPA incorporates guidance from specific State Conservation strategies, as well as

additional management based on the NTT recommendations. This alternative emphasizes management of GRSG seasonal habitats and maintaining habitat connectivity to support population objectives.

The BLM and Forest Service received approximately 4,990 substantive comments, contained in 74,240 submissions during the four Draft EISs' comment periods. Based on comments received during the NEPA process, the following comment topics were frequently identified:

- General (Process/Policy);
- Lands and Realty;
- Livestock Grazing;
- Minerals and Energy;
- Predation;
- Recreation;
- Socioeconomic;
- Special Management Area

Designations;

• Special Status Species (Including GRSG);

- Travel and Access Management;
- Vegetation;
- Wildland Fire Management;
- Wildlife and Fisheries.

For the Idaho and Southwestern Montana GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted seven public meetings. These meetings were held in Murphy, Idaho Falls, Salmon, Pocatello, Twin Falls, and Boise in Idaho and Dillon in Montana during January 2014. For the Nevada and Northeastern California GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted seven public meetings. These meetings were held in Cedarville and Susanville, California, and in Reno, Tonopah, Ely, Elko, and Winnemucca, Nevada in early December 2013. For the Oregon GRSG Proposed LUPA/Final EIS, the BLM conducted seven public meetings. These meetings were held in Baker City, Burns, Durkee, Jordan Valley, Lakeview, Ontario and Prineville, Oregon during January 2014. For the Utah GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted eight public meetings. These meetings were held in Cedar City, Panguitch, Price, Randolph, Richfield, Salt Lake City, Snowville, and Vernal, Utah during November and December 2013. Comments on the Draft LUPAs/Draft EISs received from the public and internal BLM and Forest Service review were carefully considered and incorporated as appropriate into the proposed LUPAs/Final EISs. The BLM and Forest Service, via the Western Association of Fish and Wildlife Agencies (WAFWA) Management Zone Greater Sage-Grouse Conservation Team, will develop a Regional Mitigation Strategy to guide

the application of the mitigation hierarchy to address impacts within that Zone. The Regional Mitigation Strategy should consider any State-level GRSG mitigation guidance that is consistent with the requirements. The Regional Mitigation Strategy will be developed in a transparent manner, based on the best science available and standardized metrics.

*Copies of the Idaho and Southwestern Montana GRSG Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Idaho State Office, 1387 S. Vinnell Way, Boise, ID 83709
- BLM Boise District Office, 3948 Development Avenue, Boise, ID 83705
- BLM Owyhee Field Office, 20 First Avenue West, Marsing, ID 83639
- BLM Idaho Falls District Office, 1405 Hollipark Drive, Idaho Falls, ID 83401
- BLM Salmon Field Office, 1206 South Challis Street, Salmon, ID 83467
- BLM Challis Field Office, 1151 Blue Mountain Road, Challis, ID 83226
- BLM Pocatello Field Office, 4350 Cliffs Drive, Pocatello, ID 83204
- BLM Twin Falls District Office, 2536 Kimberly Road, Twin Falls, ID 83301
- BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- BLM Burley Field Office, 15 East 200 South, Burley, ID 83318
- BLM Coeur d'Alene District Office, 3815 Schreiber Way, Coeur d'Alene, ID 83815
- BLM Cottonwood Field Office, 1 Butte Drive, Cottonwood, ID 83522
- BLM Montana State Office, 5001 Southgate Drive, Billings, MT 59101
- BLM Butte District Office, 106 North Parkmont, Butte, MT 59701
- BLM Dillon Field Office, 1005 Selway Drive, Dillon, MT 59725-9431
- Caribou-Targhee National Forest Headquarters, 1405 Hollipart Drive, Idaho Falls, ID 83401
- Beaverhead-Deerlodge Supervisor's Office, 420 Barrett Street, Dillon, MT 59725
- Salmon-Challis Supervisor's Office, 1206 S. Challis Street, Salmon, ID 83467
- Boise Supervisor's Office, 1206 Vinnell Way, Suite 200, Boise, ID 83709
- Sawtooth Supervisor's Office, 2647 Kimberly Road, East, Twin Falls, ID 83301

*Copies of the Nevada and Northeastern California Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Nevada State Office, 1340 Financial Boulevard, Reno, NV 89502
- BLM Winnemucca District Office, 5100 E. Winnemucca Boulevard, Winnemucca, NV 89445

- BLM Ely District Office, 702 North Industrial Way, Ely, NV 89301
- BLM Elko District Office, 3900 E. Idaho Street, Elko, NV 89801
- BLM Carson City District Office, 5665 Morgan Mill Road, Carson City, NV 89701
- BLM Battle Mountain District Office, 50 Bastian Road, Battle Mountain, NV 89820
- BLM California State Office, 2800 Cottage Way, Suite W-1623, Sacramento, CA 95825
- BLM Alturas Field Office, 708 W. 12th Street, Alturas, CA 96101
- BLM Eagle Lake Field Office, 2950 Riverside Drive, Susanville, CA 96130
- BLM Surprise Field Office, 602 Cressler Street, Cedarville, CA 96104
- Austin Ranger District, 100 Midas Canyon Road, Austin, NV 89310
- Carson Ranger District, 1536 South Carson Street, Carson City, NV 89701
- Ely Ranger District, 825 Avenue East, Ely, NV 90301
- Humboldt-Toiyabe National Forest Headquarters, 1200 Franklin Way, Sparks, NV 89431
- Jarbidge Ranger District, 140 Pacific Avenue, Wells, NV 89835
- Modoc National Forest, 225 West 8th, Alturas, CA 96101
- Mountain City Ranger District, 2035 Last Chance Road, Elko, NV 89801
- Santa Rosa Ranger District, 1200 East Winnemucca Boulevard, Winnemucca, NV 89445
- Tonopah Ranger District, 1400 S. Erie Mian Street, Tonopah, NV 89049

*Copies of the Oregon Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Oregon State Office, 1220 SW. 3rd Avenue, Portland, OR 97204
- BLM Baker Resource Area Office, 3100 H Street, Baker City, OR 97814
- BLM Burns District Office, 28910 Highway 20 West, Hines, OR 97738
- BLM Lakeview District Office, 1301 S. G Street, Lakeview, OR 97630
- BLM Prineville District Office, 3050 NE. 3rd Street, Prineville, OR 97754
- BLM Vale District Office, 100 Oregon Street, Vale, OR 97918

*Copies of the Utah Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Utah State Office, 440 West 200 South, Suite 500, Salt Lake City, UT 84101
- BLM Cedar City Field Office, 176 East D.L. Sargent Drive, Cedar City, UT 84721
- BLM Fillmore Field Office, 95 East 500 North, Fillmore, UT 84631
- BLM Kanab Field Office and Grand Staircase-Escalante National Monument, 669 South Highway 89A, Kanab, UT 84741

- BLM Price Field Office, 125 South 600 West, Price, UT 84501
- BLM Richfield Field Office, 150 East 900 North, Richfield, UT 84701
- BLM Salt Lake Field Office, 2370 S. Decker Lake Boulevard, West Valley City, UT 84119
- BLM Vernal Field Office, 170 South 500 East, Vernal, UT 84078
- Ashley National Forest, 355 N. Vernal Avenue, Vernal, UT 84078
- Dixie National Forest, 1789 N. Wedgewood Lane, Cedar City, UT 84721
- Fishlake National Forest, 115 East 900 North, Richfield, UT 84701
- Manti-LaSal National Forest, 599 West Price River Drive, Price, UT 84501
- Uinta-Wasatch-Cache National Forest, 857 W. South Jordan Parkway, South Jordan, UT 84095
- United States Forest Service Intermountain Region, 324 25th Street, Ogden, UT 84401

Instructions for filing a protest with the Director of the BLM regarding the Proposed LUPAs/Final EISs may be found in the "Dear Reader" Letter of the Proposed LUPAs/Final EISs and at 43 CFR 1610.5-2. All protests must be in writing and mailed to the appropriate address, as set forth in the **ADDRESSES** section above. Emailed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular mail or overnight delivery postmarked by the close of the protest period. Under these conditions, the BLM and Forest Service will consider an emailed protest as an advance copy and it will receive full consideration. If you wish to provide the BLM and Forest Service with such advance notifications, please direct emails to [protest@blm.gov](mailto:protest@blm.gov).

Before including your address, phone number, email address, or other personal identifying information in your protest, you should be aware that your entire protest—including your personal identifying information—may be made publicly available at any time. While you may ask us in your protest to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Authority:** 36 CFR 219.59, 40 CFR 1506.6, 40 CFR 1506.10, 43 CFR 1610.2; 43 CFR 1610.5

**Amy Lueders,**

*Acting Assistant Director, Renewable Resources & Planning.*

[FR Doc. 2015-12948 Filed 5-28-15; 8:45 am]

**BILLING CODE 4310-22-P**

**DEPARTMENT OF THE INTERIOR**

**Bureau of Land Management**

[LLMT001000.L16100000.DP0000.  
LXSS065E0000 MO# 4500079413]

**Notice of Availability of the Proposed Resource Management Plan and Final Environmental Impact Statement for the Billings and Pompeys Pillar National Monument Resource Management Plan Revision, Billings Field Office, Montana**

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of availability.

**SUMMARY:** In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the Bureau of Land Management (BLM) has prepared a Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Billings planning area, including Pompeys Pillar National Monument, and by this notice is announcing its availability.

**DATES:** The BLM planning regulations state that any person who meets the conditions as described in the regulations may protest the BLM's Proposed RMP/Final EIS. A person who meets the conditions and files a protest must file the protest within 30 days of the date that the Environmental Protection Agency publishes its notice of availability in the **Federal Register**.

**ADDRESSES:** Copies of the Billings and Pompeys Pillar National Monument Proposed RMP/Final EIS have been sent to affected Federal, State, and local government agencies, tribal governments, and to other stakeholders and members of the public. Copies of the Proposed RMP/Final EIS are available for public inspection at the following locations:

- BLM, Montana State Office and Billings Field Office, 5001 Southgate Drive, Billings, MT 59101.

Interested persons may also review the Proposed RMP/Final EIS on the Internet at <http://on.doi.gov/1EJBdaE>.

All protests must be in writing and mailed to one of the following addresses:

Regular Mail: BLM Director (210),  
Attention: Protest Coordinator, P.O.  
Box 71383, Washington, DC 20024-  
1383.

Overnight Delivery: BLM Director (210),  
Attention: Protest Coordinator, 20 M  
Street SE., Room 2134LM,  
Washington, DC 20003.

**FOR FURTHER INFORMATION CONTACT:**

Carolyn Sherve-Bybee, Billings and Pompeys Pillar National Monument RMP Team Leader, telephone: 406-896-5234; address: 5001 Southgate Drive, Billings, MT 59101; email: [billings\\_pompeyspillar\\_rmp@blm.gov](mailto:billings_pompeyspillar_rmp@blm.gov). Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The planning area includes lands within the BLM Billings Field Office's administrative boundaries, including Carbon, Golden Valley, Musselshell, Stillwater, Sweet Grass, Wheatland, and Yellowstone Counties in Montana, and portions of Big Horn County, Montana and Big Horn County, Wyoming. The planning area includes all lands, regardless of jurisdiction, totaling approximately 10.37 million acres; however, the BLM will only make decisions on lands that fall under the BLM's jurisdiction. The BLM decision area is comprised of approximately 434,154 acres of the surface estate in the planning area and 889,479 acres of Federal mineral estate. The revised RMP will replace the 1984 Billings RMP, as amended. The Draft RMP/EIS was made available for public review for a 90-day period on March 29, 2013 (78 FR 19291). The Draft RMP/EIS included a series of management actions, within four management alternatives, designed to address management challenges and issues raised during scoping. These included, but were not limited to, trails and travel management, wildlife habitat management including that of the Greater Sage-Grouse, energy development (coal and oil and gas), livestock grazing, recreation, lands with wilderness characteristics, special management areas including Areas of Critical Environmental Concern (ACEC) and the Pryor Mountain Wild Horse Range, and management of the cultural and historic resources at Pompeys Pillar National Monument. In accordance with 43 CFR 1610.7-2(b), the Notice of Availability for the Draft RMP/EIS announced a concurrent public comment period on proposed ACECs.

Comments on the Draft RMP/Draft EIS received from the public and internal BLM review were considered and incorporated as appropriate into the Proposed RMP/Final EIS which analyzes four alternatives:

**DEPARTMENT OF THE INTERIOR**

**Bureau of Land Management**

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**Notice of Availability of the Great Basin Region Greater Sage-Grouse Proposed Land Use Plan Amendments and Final Environmental Impact Statements for the Sub-Regions of Idaho and Southwestern Montana; Nevada and Northeastern California; Oregon; and Utah**

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of availability.

**SUMMARY:** In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, and the Resources Planning Act of 1974, as amended by the National Forest Management Act of 1976 (NFMA), the Bureau of Land Management (BLM) and U.S. Forest Service (Forest Service) have prepared Proposed Land Use Plan Amendments (LUPA) and Final Environmental Impact Statements (EISs) for planning units in Idaho, Southwestern Montana, Nevada, Northeastern California, Oregon, and Utah. There are four separate Final EISs being conducted in the Great Basin Region and this notice announces the availability of all four.

**DATES:** BLM planning regulations state that any person who meets the conditions as described in the regulations may protest the BLM's and Forest Service's Proposed LUPA/Final EIS. A person who meets the conditions and files a protest must file the protest within 30 days of the date that the Environmental Protection Agency publishes its Notice of Availability in the **Federal Register**. In accordance with 36 CFR 219.59, the Forest Service will waive its objection procedures of this subpart and instead adopt the BLM's protest procedures outlined in 43 CFR 1610.5-2.

**ADDRESSES:** Copies of the Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah Greater Sage-Grouse Proposed LUPAs/Final EISs have been sent to affected Federal, State and local government agencies, tribal governments, and to other stakeholders and members of the public who have requested copies. Copies of the Proposed LUPAs/Final EISs are available for public inspection at the addresses listed in the **SUPPLEMENTARY INFORMATION** section. Interested persons

may also review the Proposed LUPAs/ Final EISs on the internet at <http://www.blm.gov/wo/st/en/prog/more/sagegrouse.html>.

All protests must be in writing and mailed to one of the following addresses:

Regular Mail: BLM Director (210), Attention: Protest Coordinator, P.O. Box 71383, Washington, DC 20024-1383.  
Overnight Delivery: BLM Director (210), Attention: Protest Coordinator, 20 M Street SE., Room 2134LM, Washington, DC 20003.

**FOR FURTHER INFORMATION CONTACT:** *For the Idaho and Southwestern Montana Greater Sage-Grouse Proposed LUPA/ Final EIS:* Jonathan Beck, BLM Idaho State Office GRSG Planning Lead, telephone 208-373-4070; address 1387 South Vinnell Way, Boise, ID 83709; email [jmbeck@blm.gov](mailto:jmbeck@blm.gov).

*For the Nevada and Northeastern California Greater Sage-Grouse Proposed LUPA/Final EIS:* Lauren Mermejo, BLM Nevada State Office GRSG Project Lead, telephone 775-861-6580; address 1340 Financial Boulevard, Reno, NV 89502; email [lmermejo@blm.gov](mailto:lmermejo@blm.gov).

*For the Oregon Greater Sage-Grouse Proposed LUPA/Final EIS:* Joan Suther, BLM Oregon State Office GRSG Planning Lead, telephone 541-573-4445; address BLM Burns District, 28910 Hwy 20, West Hines, OR 97738; email [jsuther@blm.gov](mailto:jsuther@blm.gov).

*For the Utah Greater Sage-Grouse Proposed LUPA/Final EIS:* Quincy Bahr, BLM Utah State Office GRSG Project Lead, telephone 801-539-4122; address 440 West 200 South, Suite 500, Salt Lake City, UT 84101-1345; email [qfbahr@blm.gov](mailto:qfbahr@blm.gov).

Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individuals during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The BLM and Forest Service prepared the Idaho and Southwestern Montana, Nevada and Northeastern California, and Utah Greater Sage-Grouse LUPAs and EISs. The Oregon LUPA/EIS was prepared solely by the BLM because there were no National Forest System lands involved. All four of these Proposed LUPAs/Final EISs address a range of alternatives focused on specific conservation measures across the range of the Greater Sage-Grouse (GRSG). All four of these EISs are part of a total of 15 separate EISs that make up the BLM

and Forest Service National Greater Sage-Grouse Planning Strategy. These four EISs will amend the following BLM Resource Management Plans (RMPs) and Management Framework Plans (MFPs) and Forest Service Land and Resource Management Plans (LRMP) in the Great Basin Region:

**California**

- Alturas RMP (2008)
- Eagle Lake RMP (2008)
- Surprise RMP (2008)

**Idaho**

- Birds of Prey NCA RMP (2008)
- Bruneau RMP revision (and existing 1983 Bruneau MFP)
- Challis RMP (1999)
- Craters of the Moon NM RMP (2006)
- Four Rivers RMP revision (and existing 1988 Cascade RMP and 1983 Kuna and Bruneau MFPs)
- Jarbidge RMP revision (and existing 1987 Jarbidge RMP)
- Lemhi RMP (1987)
- Owyhee RMP (1999)
- Pocatello RMP revision
- Shoshone-Burley RMP revision (and existing 1980 Bennett Hills/ Timmerman Hills, 1985 Cassia, 1975 Magic, 1985 Monument, 1981 Sun Valley, and 1982 Twin Falls MFPs/RMPs)
- Upper Snake RMP revision (and existing 1983 Big Lost, 1985 Medicine Lodge, 1981 Big Desert, and 1981 Little Lost-Birch Creek MFPs/RMPs)
- Boise National Forest, LRMP (2003)
- Curlew National Grassland Management Plan, LRMP (2002)
- Caribou National Forest, Revised LRMP (2003)
- Caribou-Targhee National Forest, Targhee National Forest LRMP (1997)
- Salmon-Challis National Forest, Challis National Forest LRMP (1987)
- Salmon-Challis National Forest, Salmon National Forest LRMP (1988)
- Sawtooth National Forest, Revised LRMP (2003)

**Montana**

- Dillon RMP (2006)
- Beaverhead-Deerlodge National Forest, LRMP (2009)

**Nevada**

- Battle Mountain RMP revision (and existing 1997 Tonopah and 1986 Shoshone-Eureka RMPs)
- Black Rock Desert-High Rock Canyon NCA RMP (2004)
- Carson City RMP revision (and existing 2001 Carson City Consolidated RMP)
- Elko RMP (1987)
- Ely RMP (2008)

- Wells RMP (1985)
- Winnemucca RMP revision (and existing 1982 Paradise-Denio MFP and 1982 Sonoma-Gerlach RMP)
- Humboldt National Forest, LRMP (1986)
- Toiyabe National Forest, LRMP (1986)

### Oregon

- Andrews RMP (2005)
- Baker RMP revision (and existing 1989 Baker RMP)
- Brothers-LaPine RMP (1989)
- Lakeview RMP amendment (and existing 2003 Lakeview RMP)
- Southeastern Oregon RMP amendment (and existing 2003 Southeastern Oregon RMP)
- Steens RMP (2005)
- Three Rivers RMP (1992)
- Upper Deschutes RMP (2005)

### Utah

- Box Elder RMP (1986)
- Cedar/Beaver/Garfield/Antimony RMP (1986)
- Grand Staircase-Escalante National Monument Management Plan (2000)
- House Range RMP (1987)
- Kanab RMP (2008)
- Park City MFP (1975)
- Pinyon MFP (1978)
- Pony Express RMP (1990)
- Price RMP (2008)
- Randolph MFP (1980)
- Richfield RMP (2008)
- Salt Lake District Isolated Tracts Planning Analysis (1985)
- Vernal RMP (2008)
- Warm Springs RMP (1987)
- Dixie National Forest, LRMP (1986)
- Fishlake National Forest, LRMP (1986)
- Uinta National Forest, Revised LRMP (2003)
- Wasatch-Cache National Forest, Revised LRMP (2003)
- Ashley National Forest, LRMP (1986)
- Manti-La Sal National Forest, LRMP (1986)

Management decisions made as a result of these Proposed LUPAs/Final EISs will apply only to BLM-administered and National Forest System lands in the planning area. The planning areas for all four EISs includes approximately 194.0 million acres of BLM, National Park Service, Forest Service, U.S. Bureau of Reclamation, State, tribal, local, and private lands located in 28 Idaho counties (Ada, Adams, Bear Lake, Bingham, Blaine, Bonneville, Butte, Camas, Caribou, Cassia, Clark, Custer, Elmore, Fremont, Gem, Gooding, Jefferson, Jerome, Lemhi, Lincoln, Madison, Minidoka, Oneida, Owyhee, Payette, Power, Twin Falls, and Washington), 7 Montana counties

(Montana, Beaverhead, Deer Lodge, Fremont, Clark, Madison, and Silver Bow), 16 Nevada counties (Carson City, Churchill, Douglas, Elko, Esmeralda, Eureka, Humboldt, Lander, Lincoln, Lyon, Mineral, Nye, Pershing, Storey, Washoe, and White Pine), 5 California counties (Lassen, Modoc, Plumas, Siskiyou, and Sierra), 8 Oregon counties (Baker, Crook, Deschutes, Grant, Harney, Lake, Malheur, and Union), 24 Utah counties (Beaver, Box Elder, Cache, Carbon, Daggett, Duchesne, Emery, Garfield, Grand, Iron, Juab, Kane, Morgan, Piute, Rich, Sanpete, Sevier, Summit, Tooele, Uintah, Utah, Wasatch, Wayne, and Weber), and 2 Wyoming counties (Sweetwater and Uinta). The decision area for these Proposed LUPAs/Final EISs is defined as those BLM-administered and National Forest System lands and Federal mineral estate within the following habitat management categories:

- Priority Habitat Management Area (PHMA)—Areas identified as having the highest conservation value for maintaining sustainable GRSG populations; includes breeding, late brood-rearing, and winter concentration areas.

- Important Habitat Management Area (IHMA) (applicable to Idaho only)—Areas identified as having generally moderate to high conservation value habitat and/or populations that provide a management buffer for the PHMA and to connect patches of PHMA.

- General Habitat Management Area (GHMA)—Areas of seasonal or year-round GRSG habitat outside of PHMAs.

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The alternatives presented in Proposed LUPAs/Final EISs are described below:

- Alternative A would retain the current management goals, objectives and direction specified in the existing

BLM RMPs and the Forest Service LRMPs.

- Alternative B is based on the conservation measures developed by the National Technical Team (NTT) planning effort in Washington Office Instructional Memorandum (IM) Number 2012–044. As directed in the IM, the conservation measures developed by the NTT must be considered and analyzed, as appropriate, through the land use planning process and NEPA by all BLM state and field offices that contain occupied GRSG habitat. Most management actions included in Alternative B would be applied to PHMA.

- Alternative C is based on a citizen groups' recommended alternative. This alternative emphasizes improvement and protection of habitat for GRSG and is applied to all occupied GRSG habitat. Alternative C would limit commodity development in areas of occupied GRSG habitat, and would close or designate portions of the planning area to some land uses. The Utah LUPA/Draft EIS combined this alternative with Alternative F (discussed below).

- Alternative D, which was identified as the Preferred Alternative in the Draft EIS, balances opportunities to use and develop the planning area and protects GRSG habitat based on scoping comments and input from Cooperating Agencies involved in the alternatives development process. Protective measures would be applied to GRSG habitat.

- Alternative E is the alternative provided by the State or Governor's offices for inclusion and analysis in the EISs. It incorporates guidance from specific State Conservation strategies and emphasizes management of greater sage-grouse seasonal habitats and maintaining habitat connectivity to support population objectives. This alternative was identified as a co-Preferred Alternative in the Idaho and Southwestern Montana Draft EIS.

- Alternative F is also based on a citizen group recommended alternative. This alternative emphasizes improvement and protection of habitat for GRSG and defines different restrictions for PHMA and GHMA. Alternative F would limit commodity development in areas of occupied GRSG habitat, and would close or designate portions of the planning area to some land uses. This alternative does not apply to the Utah sub-regional planning effort, as it was combined with Alternative C.

- The Proposed LUPA incorporates guidance from specific State Conservation strategies, as well as



additional management based on the NTT recommendations. This alternative emphasizes management of GRSG seasonal habitats and maintaining habitat connectivity to support population objectives.

The BLM and Forest Service received approximately 4,990 substantive comments, contained in 74,240 submissions during the four Draft EISs' comment periods. Based on comments received during the NEPA process, the following comment topics were frequently identified:

- General (Process/Policy);
- Lands and Realty;
- Livestock Grazing;
- Minerals and Energy;
- Predation;
- Recreation;
- Socioeconomic;
- Special Management Area Designations;
- Special Status Species (Including GRSG);
- Travel and Access Management;
- Vegetation;
- Wildland Fire Management;
- Wildlife and Fisheries.

For the Idaho and Southwestern Montana GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted seven public meetings. These meetings were held in Murphy, Idaho Falls, Salmon, Pocatello, Twin Falls, and Boise in Idaho and Dillon in Montana during January 2014. For the Nevada and Northeastern California GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted seven public meetings. These meetings were held in Cedarville and Susanville, California, and in Reno, Tonopah, Ely, Elko, and Winnemucca, Nevada in early December 2013. For the Oregon GRSG Proposed LUPA/Final EIS, the BLM conducted seven public meetings. These meetings were held in Baker City, Burns, Durkee, Jordan Valley, Lakeview, Ontario and Prineville, Oregon during January 2014. For the Utah GRSG Proposed LUPA/Final EIS, the BLM and Forest Service conducted eight public meetings. These meetings were held in Cedar City, Panguitch, Price, Randolph, Richfield, Salt Lake City, Snowville, and Vernal, Utah during November and December 2013. Comments on the Draft LUPAs/Draft EISs received from the public and internal BLM and Forest Service review were carefully considered and incorporated as appropriate into the proposed LUPAs/Final EISs. The BLM and Forest Service, via the Western Association of Fish and Wildlife Agencies (WAFWA) Management Zone Greater Sage-Grouse Conservation Team, will develop a Regional Mitigation Strategy to guide

the application of the mitigation hierarchy to address impacts within that Zone. The Regional Mitigation Strategy should consider any State-level GRSG mitigation guidance that is consistent with the requirements. The Regional Mitigation Strategy will be developed in a transparent manner, based on the best science available and standardized metrics.

*Copies of the Idaho and Southwestern Montana GRSG Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Idaho State Office, 1387 S. Vinnell Way, Boise, ID 83709
- BLM Boise District Office, 3948 Development Avenue, Boise, ID 83705
- BLM Owyhee Field Office, 20 First Avenue West, Marsing, ID 83639
- BLM Idaho Falls District Office, 1405 Hollipark Drive, Idaho Falls, ID 83401
- BLM Salmon Field Office, 1206 South Challis Street, Salmon, ID 83467
- BLM Challis Field Office, 1151 Blue Mountain Road, Challis, ID 83226
- BLM Pocatello Field Office, 4350 Cliffs Drive, Pocatello, ID 83204
- BLM Twin Falls District Office, 2536 Kimberly Road, Twin Falls, ID 83301
- BLM Shoshone Field Office, 400 West F Street, Shoshone, ID 83352
- BLM Burley Field Office, 15 East 200 South, Burley, ID 83318
- BLM Coeur d'Alene District Office, 3815 Schreiber Way, Coeur d'Alene, ID 83815
- BLM Cottonwood Field Office, 1 Butte Drive, Cottonwood, ID 83522
- BLM Montana State Office, 5001 Southgate Drive, Billings, MT 59101
- BLM Butte District Office, 106 North Parkmont, Butte, MT 59701
- BLM Dillon Field Office, 1005 Selway Drive, Dillon, MT 59725-9431
- Caribou-Targhee National Forest Headquarters, 1405 Hollipart Drive, Idaho Falls, ID 83401
- Beaverhead-Deerlodge Supervisor's Office, 420 Barrett Street, Dillon, MT 59725
- Salmon-Challis Supervisor's Office, 1206 S. Challis Street, Salmon, ID 83467
- Boise Supervisor's Office, 1206 Vinnell Way, Suite 200, Boise, ID 83709
- Sawtooth Supervisor's Office, 2647 Kimberly Road, East, Twin Falls, ID 83301

*Copies of the Nevada and Northeastern California Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Nevada State Office, 1340 Financial Boulevard, Reno, NV 89502
- BLM Winnemucca District Office, 5100 E. Winnemucca Boulevard, Winnemucca, NV 89445

- BLM Ely District Office, 702 North Industrial Way, Ely, NV 89301
- BLM Elko District Office, 3900 E. Idaho Street, Elko, NV 89801
- BLM Carson City District Office, 5665 Morgan Mill Road, Carson City, NV 89701
- BLM Battle Mountain District Office, 50 Bastian Road, Battle Mountain, NV 89820
- BLM California State Office, 2800 Cottage Way, Suite W-1623, Sacramento, CA 95825
- BLM Alturas Field Office, 708 W. 12th Street, Alturas, CA 96101
- BLM Eagle Lake Field Office, 2950 Riverside Drive, Susanville, CA 96130
- BLM Surprise Field Office, 602 Cressler Street, Cedarville, CA 96104
- Austin Ranger District, 100 Midas Canyon Road, Austin, NV 89310
- Carson Ranger District, 1536 South Carson Street, Carson City, NV 89701
- Ely Ranger District, 825 Avenue East, Ely, NV 90301
- Humboldt-Toiyabe National Forest Headquarters, 1200 Franklin Way, Sparks, NV 89431
- Jarbidge Ranger District, 140 Pacific Avenue, Wells, NV 89835
- Modoc National Forest, 225 West 8th, Alturas, CA 96101
- Mountain City Ranger District, 2035 Last Chance Road, Elko, NV 89801
- Santa Rosa Ranger District, 1200 East Winnemucca Boulevard, Winnemucca, NV 89445
- Tonopah Ranger District, 1400 S. Erie Mian Street, Tonopah, NV 89049

*Copies of the Oregon Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Oregon State Office, 1220 SW. 3rd Avenue, Portland, OR 97204
- BLM Baker Resource Area Office, 3100 H Street, Baker City, OR 97814
- BLM Burns District Office, 28910 Highway 20 West, Hines, OR 97738
- BLM Lakeview District Office, 1301 S. G Street, Lakeview, OR 97630
- BLM Prineville District Office, 3050 NE. 3rd Street, Prineville, OR 97754
- BLM Vale District Office, 100 Oregon Street, Vale, OR 97918

*Copies of the Utah Greater Sage-Grouse Proposed LUPA/Final EIS are available for public inspection at:*

- BLM Utah State Office, 440 West 200 South, Suite 500, Salt Lake City, UT 84101
- BLM Cedar City Field Office, 176 East D.L. Sargent Drive, Cedar City, UT 84721
- BLM Fillmore Field Office, 95 East 500 North, Fillmore, UT 84631
- BLM Kanab Field Office and Grand Staircase-Escalante National Monument, 669 South Highway 89A, Kanab, UT 84741

- BLM Price Field Office, 125 South 600 West, Price, UT 84501
- BLM Richfield Field Office, 150 East 900 North, Richfield, UT 84701
- BLM Salt Lake Field Office, 2370 S. Decker Lake Boulevard, West Valley City, UT 84119
- BLM Vernal Field Office, 170 South 500 East, Vernal, UT 84078
- Ashley National Forest, 355 N. Vernal Avenue, Vernal, UT 84078
- Dixie National Forest, 1789 N. Wedgewood Lane, Cedar City, UT 84721
- Fishlake National Forest, 115 East 900 North, Richfield, UT 84701
- Manti-LaSal National Forest, 599 West Price River Drive, Price, UT 84501
- Uinta-Wasatch-Cache National Forest, 857 W. South Jordan Parkway, South Jordan, UT 84095
- United States Forest Service Intermountain Region, 324 25th Street, Ogden, UT 84401

Instructions for filing a protest with the Director of the BLM regarding the Proposed LUPAs/Final EISs may be found in the "Dear Reader" Letter of the Proposed LUPAs/Final EISs and at 43 CFR 1610.5-2. All protests must be in writing and mailed to the appropriate address, as set forth in the **ADDRESSES** section above. Emailed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular mail or overnight delivery postmarked by the close of the protest period. Under these conditions, the BLM and Forest Service will consider an emailed protest as an advance copy and it will receive full consideration. If you wish to provide the BLM and Forest Service with such advance notifications, please direct emails to [protest@blm.gov](mailto:protest@blm.gov).

Before including your address, phone number, email address, or other personal identifying information in your protest, you should be aware that your entire protest—including your personal identifying information—may be made publicly available at any time. While you may ask us in your protest to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Authority:** 36 CFR 219.59, 40 CFR 1506.6, 40 CFR 1506.10, 43 CFR 1610.2; 43 CFR 1610.5

**Amy Lueders,**

*Acting Assistant Director, Renewable Resources & Planning.*

[FR Doc. 2015-12948 Filed 5-28-15; 8:45 am]

BILLING CODE 4310-22-P

**DEPARTMENT OF THE INTERIOR**

**Bureau of Land Management**

[LLMT001000.L16100000.DP0000.  
LXSS065E0000 MO# 4500079413]

**Notice of Availability of the Proposed Resource Management Plan and Final Environmental Impact Statement for the Billings and Pompeys Pillar National Monument Resource Management Plan Revision, Billings Field Office, Montana**

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of availability.

**SUMMARY:** In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the Bureau of Land Management (BLM) has prepared a Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Billings planning area, including Pompeys Pillar National Monument, and by this notice is announcing its availability.

**DATES:** The BLM planning regulations state that any person who meets the conditions as described in the regulations may protest the BLM's Proposed RMP/Final EIS. A person who meets the conditions and files a protest must file the protest within 30 days of the date that the Environmental Protection Agency publishes its notice of availability in the **Federal Register**.

**ADDRESSES:** Copies of the Billings and Pompeys Pillar National Monument Proposed RMP/Final EIS have been sent to affected Federal, State, and local government agencies, tribal governments, and to other stakeholders and members of the public. Copies of the Proposed RMP/Final EIS are available for public inspection at the following locations:

- BLM, Montana State Office and Billings Field Office, 5001 Southgate Drive, Billings, MT 59101.

Interested persons may also review the Proposed RMP/Final EIS on the Internet at <http://on.doi.gov/1EJbdaE>.

All protests must be in writing and mailed to one of the following addresses:

Regular Mail: BLM Director (210),  
Attention: Protest Coordinator, P.O.  
Box 71383, Washington, DC 20024-  
1383.

Overnight Delivery: BLM Director (210),  
Attention: Protest Coordinator, 20 M  
Street SE., Room 2134LM,  
Washington, DC 20003.

**FOR FURTHER INFORMATION CONTACT:**

Carolyn Sherve-Bybee, Billings and Pompeys Pillar National Monument RMP Team Leader, telephone: 406-896-5234; address: 5001 Southgate Drive, Billings, MT 59101; email: [billings\\_pompeyspillar\\_rmp@blm.gov](mailto:billings_pompeyspillar_rmp@blm.gov). Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

**SUPPLEMENTARY INFORMATION:** The planning area includes lands within the BLM Billings Field Office's administrative boundaries, including Carbon, Golden Valley, Musselshell, Stillwater, Sweet Grass, Wheatland, and Yellowstone Counties in Montana, and portions of Big Horn County, Montana and Big Horn County, Wyoming. The planning area includes all lands, regardless of jurisdiction, totaling approximately 10.37 million acres; however, the BLM will only make decisions on lands that fall under the BLM's jurisdiction. The BLM decision area is comprised of approximately 434,154 acres of the surface estate in the planning area and 889,479 acres of Federal mineral estate. The revised RMP will replace the 1984 Billings RMP, as amended. The Draft RMP/EIS was made available for public review for a 90-day period on March 29, 2013 (78 FR 19291). The Draft RMP/EIS included a series of management actions, within four management alternatives, designed to address management challenges and issues raised during scoping. These included, but were not limited to, trails and travel management, wildlife habitat management including that of the Greater Sage-Grouse, energy development (coal and oil and gas), livestock grazing, recreation, lands with wilderness characteristics, special management areas including Areas of Critical Environmental Concern (ACEC) and the Pryor Mountain Wild Horse Range, and management of the cultural and historic resources at Pompeys Pillar National Monument. In accordance with 43 CFR 1610.7-2(b), the Notice of Availability for the Draft RMP/EIS announced a concurrent public comment period on proposed ACECs.

Comments on the Draft RMP/Draft EIS received from the public and internal BLM review were considered and incorporated as appropriate into the Proposed RMP/Final EIS which analyzes four alternatives:

**Brent Ralston**

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**From:** Munson, Johanna  
**Sent:** Wednesday, March 18, 2015 4:11 PM  
**To:** BLM\_ID\_SO\_LLID931000  
**Subject:** Fwd: Coalition challenges science behind Interior grouse protections

IDMT\_PUB\_9778  
3.5.b

FYI - many of you may have already seen this SG article, but here it is again just in case.

----- Forwarded message -----

From: **Wiedenmann, Kurt** <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>  
Date: Wed, Mar 18, 2015 at 1:56 PM  
Subject: Fwd: Coalition challenges science behind Interior grouse protections  
To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, Johanna Munson <[jmunson@blm.gov](mailto:jmunson@blm.gov)>, Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>, Paul Makela <[pmakela@blm.gov](mailto:pmakela@blm.gov)>, Ethan Ellsworth <[eellsworth@blm.gov](mailto:eellsworth@blm.gov)>

fyi

**Kurt Wiedenmann**

Branch Chief - Resources & Science  
BLM Idaho State Office

Office - 208-373-3813  
Cell - 208-2709659

----- Forwarded message -----

From: **Small, Stephen** <[ssmall@blm.gov](mailto:ssmall@blm.gov)>  
Date: Wed, Mar 18, 2015 at 1:26 PM  
Subject: Fwd: Coalition challenges science behind Interior grouse protections  
To: Kurt Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>

Thanks Kurt,

Attached is another article that came out today that references the same letter.

Steve Small  
Division Chief  
Bureau of Land Management  
Fish and Wildlife Conservation  
20 M Street SE  
Washington, DC 20003  
Desk: (202) 912-7366

Cell: (202) 657-9783  
Email: [ssmall@blm.gov](mailto:ssmall@blm.gov)

----- Forwarded message -----

From: **Muller, Kit** <[kmuller@blm.gov](mailto:kmuller@blm.gov)>

Date: Wed, Mar 18, 2015 at 2:18 PM

Subject: Coalition challenges science behind Interior grouse protections

To: Heidi Hadley <[hhadley@blm.gov](mailto:hhadley@blm.gov)>, "Melvin (Joe) Tague" <[jtague@blm.gov](mailto:jtague@blm.gov)>, "Prentice, Karen L" <[kprentic@blm.gov](mailto:kprentic@blm.gov)>, Kathie Libby <[klibby@blm.gov](mailto:klibby@blm.gov)>, Raul Morales <[rmorales@blm.gov](mailto:rmorales@blm.gov)>, Roxanne Falise <[rfalise@blm.gov](mailto:rfalise@blm.gov)>, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>, Stephen Small <[ssmall@blm.gov](mailto:ssmall@blm.gov)>

## **Coalition challenges science behind Interior grouse protections**

Scott Streater, E&E reporter

Published: Wednesday, March 18, 2015

A coalition of the oil and gas industry, mining groups and local governments in four states is formally challenging some of the core scientific documents the Interior Department is using to protect greater sage grouse habitat covering millions of acres of public lands across the West.

Specifically, the coalition is challenging three reports under the Data Quality Act that the Interior Department is using to justify amending as many as 98 Bureau of Land Management resource management plans (RMPs) and Forest Service land-use plans to add grouse conservation measures.

These scientific reports produced in the last five years by BLM, the U.S. Geological Survey and the Fish and Wildlife Service are likely to be core documents FWS uses in deciding by September whether to propose listing the greater sage grouse for protection under the Endangered Species Act.

But the influential 2011 grouse management report by BLM's National Technical Team (NTT) of sage grouse experts and an FWS-commissioned report in 2013 by a conservation objectives team (COT) that outlined rangewide sage grouse protection goals are riddled with factual errors, the coalition alleges. So, too, is a 2010 report from USGS that the service "relied extensively upon" in order to justify its determination in March of that year that the grouse warranted federal protection, the groups said.

Taken together, the three reports "advance a one-sided narrative that is simply not supported by the full body of scientific literature and data," according to an executive summary outlining the three challenges that was researched and written by a team led by Kent Holsinger, a Denver-based natural resources attorney.

The coalition -- which includes the Denver-based Western Energy Alliance, the American Exploration & Mining Association, and a total of 19 counties in Colorado, Montana, Nevada and Utah -- asks Interior to "retract" the three reports "and their use in land use plan amendments and the upcoming listing decision" by FWS, the summary says.

"Alternatively, the agencies could issue amended reports that use sound analytical methods and the best data available while ensuring transparency and objectivity, and adjust their policies accordingly," it concludes.

Emily Beyer, an Interior spokeswoman in Washington, D.C., said the agency is reviewing the latest challenges from the coalition.

It is up to Interior whether to agree to revise the reports or continue to use them. BLM has 60 days to respond to the complaint regarding the NTT report; FWS and USGS have 90 days to respond.

Beyer, however, pointed to comments from Interior Secretary Sally Jewell yesterday during a speech to the Center for Strategic and International Studies regarding sage grouse research and efforts by FWS to get right whatever decision they make on the status of the grouse.

"We are using sound science. We are using the best available science we have," Jewell said during a question-and-answer session after the speech. "We will take, at the Fish and Wildlife Service, all of the science into account, and we must do that because if we don't do that and we come out with a decision on whether or not a listing or not is warranted, we know it's going to be challenged in court. The question is will it be defensible."

The challenges drew immediate condemnation from conservation groups.

Mark Salvo, director of federal lands conservation with Defenders of Wildlife, said few other species "have been studied so thoroughly as sage grouse and their habitat requirements."

"Just because you don't agree with recommendations to conserve the species doesn't mean they're wrong," Salvo added. "These data challenges will only drain resources away from current efforts to protect and recover sage grouse."

But Holsinger said the three challenges document "real issues with transparency and scientific integrity" that need to be addressed.

He said a careful analysis of data they obtained under the Freedom of Information Act "found extensive flaws in the agencies' science, and demonstrated how they exaggerate impacts from human activities while ignoring real threats like predation, as well as natural fluctuations," he said. "The steadfast reliance and perpetuation of flawed information reveals these agencies aren't as much interested in sage-grouse conservation as they are in controlling our economy and western way of life."

The challenges underscore how political the issue of sage grouse conservation has become, in large part because the bird has such a broad range covering millions of acres of public and private lands.

In 2010, FWS ruled that the greater sage grouse deserves federal protection but that other species took higher priority amid limited resources and placed the bird on a candidate list of species that may be given protections in the future.

Since that time, federal and state leaders have launched what the service acknowledges is an unprecedented effort to save the greater sage grouse, fearing that an ESA listing would cripple the energy, farming and ranching industries across the West.

Western leaders and energy industry officials have complained for some time that they want more information on the criteria FWS will use to determine whether the conservation measures and policies in place are enough to protect the grouse and keep it off the endangered species list.

While FWS is under a court-mandated Sept. 30 deadline to decide whether to propose listing the bird for ESA protection, Republicans in Congress last year successfully attached a legislative rider to the \$1.1 trillion spending bill preventing the service from formally listing the sage grouse.

Jewell has said the legislative rider will not prevent FWS from issuing a decision by the deadline on the status of the bird.

The letter from the coalition of groups comes less than a week after a group of scientists wrote in [a letter](#) to Jewell and Agriculture Secretary Tom Vilsack that strictly following the NTT and COT reports isn't enough to accomplish the goal of keeping the bird from being listed as threatened or endangered ([Greenwire](#), March 12).

While the scientists said "many portions of the NTT Report provide a scientific baseline for managing greater sage-grouse habitat using consistent, measurable conservation standards," they noted that "other parts of the report contained questionable statements that are not supported by the best available science."

The industry and state coalition focuses on that point, accusing the NTT and COT reports, along with the USGS report, of "fundamentally and erroneously" ignoring "accurate population data" concerning grouse and the health of grouse breeding grounds, called leks, according to the executive summary of the challenges.

"The Reports were developed with unsound research methods resulting in a partial and biased presentation of information, and peer reviewers have found them to be inaccurate, unreliable, and biased," the summary says. "They contain substantial technical errors, including misleading use of authority and failure to address studies that do not support a federal, one-size-fits-all narrative."

The summary adds, "As a result, the Reports impetuously reach conjectural conclusions that are not scientifically supported, especially the frequently repeated but flawed assumption that a temporary decrease in lek counts equates to a population decline. Driven by policy considerations rather than defensible biological criteria, the Reports do not address specific cause and effect threats to [sage grouse]. Rather, they selectively present biased information while ignoring contrary information and the scientific method."

[Click here](#) to read the three challenges.

--  
Johanna Munson  
Acting Branch Chief, Resources and Science  
Idaho State Office  
Bureau of Land Management  
1387 S. Vinnell Way  
Boise, Idaho 83709

Office: 208-373-3813  
Fax: 208-373-3805  
Email: [jmunson@blm.gov](mailto:jmunson@blm.gov)

Trusted stewards of Idaho's Resources,  
From Main Street to Mountaintop



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3.5.c

## Idaho Department of Lands outlines plan to protect sage grouse habitat

FOR IMMEDIATE RELEASE  
Feb. 17, 2015

(BOISE) - The Idaho Department of Lands (IDL) laid out **proposed conservation measures to protect sage grouse habitat** on rangelands owned by the state endowment trust. It also outlined proposed conservation measures for the department's roles in wildfire prevention and suppression, and regulating oil and gas development and some mining activity.

The State Board of Land Commissioners (Land Board) heard an informational update on the draft plan today.

[View the draft IDL Proposed Greater Sage-Grouse Conservation Plan here.](#)

**The IDL draft plan complements Governor Otter's sage grouse plan for federal land management in Idaho.**

The Governor's plan was submitted to the U.S. Department of Interior Bureau of Land Management (BLM) and U.S. Fish and Wildlife Service (USFWS) in September 2012. The Governor's Plan was incorporated in the November 2013 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Management Plan Amendment and Environmental Impact Statement, where it was presented as a "co-preferred alternative."

With the development of federal land management practices for sage-grouse, the USFWS asked 11 western states with sage-grouse habitat to develop complementary conservation measures for state lands. The Governor's Office of Species Conservation and IDL Director Tom Schultz began developing conservation measures for endowment trust lands in Idaho to **further demonstrate Idaho's commitment to conserving sage-grouse to prevent a listing of the species** under the Endangered Species Act (ESA).

In October 2014 Schultz tasked the development of the draft plan to a group of IDL experts who oversee programs that could be affected by a sage-grouse listing.

**Governor Otter backed up Idaho's commitment with a budget recommendation** of \$750,000 for sage-grouse conservation activities, including \$250,000 for IDL to implement cooperative fuel breaks on endowment rangelands and money to refurbish firefighting equipment for use by Idaho's rangeland fire protection associations - groups of ranchers trained and legally authorized to fight range fires in Idaho.

**The IDL is soliciting feedback from the public on the draft plan through March 2, 2015.** Comments can be e-mailed to Pat Seymour, Endangered Species Program Manager at [pseymour@idl.idaho.gov](mailto:pseymour@idl.idaho.gov). The IDL also is working with natural resource industry user groups, environmental organizations, and relevant state agencies to fine-tune the draft plan. Many of the participants also are members of the Governor's Sage Grouse Task Force.

**In March the Land Board and Oil and Gas Conservation Commission will vote to approve portions of the plan that have to do with their respective authorities.**

The USFWS will consider the Idaho

### IDL Proposed Greater Sage-Grouse Conservation Plan

#### **Conservation Measures for Activities on State Endowment Trust Lands**

More than 600,000 acres of state endowment rangeland in southern Idaho fall within identified "core" and "important" habitat zones. The acreage makes up about 44 percent of endowment rangeland ownership in Idaho.

For proposed activities by third parties on state endowment trust lands, IDL will implement sage-grouse conservation measures as enforceable stipulations in authorizing documents such as leases, permits, and easements. Authorized activities include:

- Alternative energy development (solar, wind and geothermal)
- Oil and gas exploration and development
- Mining
- Grazing
- Miscellaneous commercial activities
- The granting of access through rights-of-way, including easements

Additionally, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

#### **Conservation Measures for Regulated Activities in the Oil & Gas and Minerals Programs**

For regulatory and assistance activities, conservation measures will be voluntary best management practices (BMPs) on private land. Where appropriate, IDL will include recommended BMPs in its authorizing documents to encourage compliance. Activities include:

- Abandoned Mine Lands projects
- Dredge and Placer Mine permits
- Mine Reclamation Plan approvals
- Oil and Gas Permits (seismic imaging surveys, well drilling)
- Oil and Gas Development



## Idaho Department of Lands Proposed Greater Sage-Grouse Conservation Plan

### 1. Introduction to the Proposed Plan (Plan)

Sage-grouse is a candidate species currently being reviewed by the US Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA). In 2010, the USFWS determined Greater Sage-grouse (sage-grouse) warranted protection under the Endangered Species Act, but it was precluded from listing due to higher priority species. In the USFWS decision, the primary threats listed for Idaho were: wildfire, invasive species, and infrastructure development.

The timeline for USFWS analysis was further accelerated when in 2011 a multi district litigation in the US District Court of the District of Columbia resulted in a settlement agreement between the litigants and the USFWS. The settlement agreement required the USFWS to implement a six year work plan that will enable the agency to systematically review and address the needs of more than 250 species listed on the 2010 *Candidate Notice of Review* to determine if they should be added to the Federal Lists of Endangered and Threatened Wildlife and Plants. The USFWS agreed to determine the listing status of sage-grouse in 2015. Later in 2012, the United States District Court for the District of Idaho ruled that pursuant to the D.C. District Court settlement, the USFWS must reevaluate the status of sage-grouse under the ESA by September 30, 2015. In response to these deadlines, Secretary of the Interior Salazar invited the eleven western states impacted by a potential listing of the species to develop state-specific regulatory mechanisms to address these cited deficiencies in an effort to preclude a listing under the ESA.

As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM's management zones within sage-grouse habitat.

In March 2012, Governor Otter issued Executive Order No. 2012-02 which established the Governor's Sage-grouse Task Force. The task force goal was to ultimately develop state-specific regulatory mechanisms to enable the BLM to incorporate the State's plan as an alternative in BLM's environmental analysis pursuant to the National Environmental Policy Act (NEPA) EIS. The Governor's Plan was submitted to the BLM and USFWS in September 2012. The Governor's Plan was incorporated as Alternative E in the November 2103 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Plan Amendment and EIS, where it was presented as a "co-preferred Alternative" along with BLM's Alternative D.

As part of Idaho's commitment to conserving sage-grouse, the Idaho Department of Lands (IDL) has developed draft conservation measures (CMs) for Endowment Trust Land Management programs and for Regulatory and Service programs that complement the Governor's Sage-grouse Plan for federal land management in Idaho.



For proposed activities by third parties on state endowment trust lands, IDL will implement sage-grouse conservation measures as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities, conservation measures will be voluntary best management practices (BMP's) on private land because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: Abandoned Mine Lands Projects; Dredge and Placer Mine Permits; Mine Reclamation Plan Approvals; and Oil & Gas Permits (seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended best management practices within its authorizing documents to encourage compliance.

For some fire programs, IDL will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

The Plan format follows the headings used in the USDI Bureau of Land Management (BLM) *Administrative Draft Proposed Plan* as an organizational outline and reader courtesy.

The Plan utilizes the *State of Idaho Habitat Zone* classifications defined in 2012 by the Idaho Department of Fish & Game (IDFG). Consistent with the Governor's Plan, IDL will focus conservation efforts on the Core and Important habitat zones which include the great majority of the sage-grouse populations in Idaho. Idaho has over 10,500,000 acres in Core and Important sage-grouse habitat zones, with the vast majority of these acres under Federal management (Table 1.1). IDL has surface or mineral ownership of almost 690,000 acres of Core and Important habitat, with about 619,000 acres of surface ownership in these habitat zones. While the IDL ownership is a relatively small proportion of the 10.5 million acres of habitat (less than 6%), almost half of the endowment trust rangelands are found within the Core and Important habitat zones.

## **2. Purpose of the Plan**

The Plan has a threefold purpose. (1) It summarizes conservation measures for state endowment trust land programs and IDL regulatory/service programs that are complementary to the Governor's Plan for management of federal land. (2) It communicates to the USFWS that, along with the Governor's Plan, there are adequate existing regulatory mechanisms to alleviate the primary threats to sage-grouse and sage-grouse habitat in Idaho. (Such certainty will be necessary to prevent the sage-grouse from being listed under the Endangered Species Act). (3) It preserves the statutory responsibility of IDL to manage 2.4 million acres of [state endowment trust land](#) under a constitutional mandate to maximize long-term financial returns to state institutions, mainly public schools.

### 3. Coordination

Utilizing available funding, IDL will collaborate, coordinate, and utilize cooperative planning efforts to implement and monitor proposed conservation measures to protect and potentially improve sage-grouse habitat. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, lease/permit holders, and nongovernmental organizations.

Current sage-grouse coordination efforts in which IDL is involved include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015),*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project,*
- c. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015),*
- d. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014), and*
- e. *Draft BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015).*

### 4. Greater Sage-Grouse Management Areas

The Plan utilizes the *State of Idaho Habitat Zone* classifications defined in 2012 by the IDFG. It uses a *Core* and *Important* habitat zone classification that is somewhat different from the BLM habitat classification of *Primary*, *Important*, and *General* habitat management areas. The BLM and State classifications do not perfectly overlay or intersect each other. Currently, the BLM and State of Idaho are finalizing the delineation of the habitat management zones to correct these discrepancies between the mapping processes. The result will be a classification structure utilizing the *Primary*, *Important*, and *General* habitat management areas. The Plan will be revised to reflect any changes resulting from using the revised habitat classification. IDL will recognize any habitat management updates resulting from the five-year formal map review.

### 5. Adaptive Management

The BLM's *Administrative Draft Proposed Plan* utilizes hard and soft population and habitat triggers to determine an appropriate management response. For example, a hard trigger would be tripped by the 20% loss of key habitat within BLM determined Biologically Significant Units (BSUs). BSUs are the modeled nesting and wintering habitat within the Core and Important habitat zones. When this 20% criterion had been exceeded, then the management measures for federal land applied to the core habitat zone would now also be applied to the important habitat zone.

IDL recognizes that the soft and hard triggers described in the BLM's *Administrative Draft Proposed Plan* apply to federally managed land. Where a trigger is tripped, and the BLM Implementation Team identifies measures or recommendations that IDL determines to be applicable to IDL managed land or IDL regulatory programs, IDL commits to full consideration and if applicable, will forward such recommendations to the State Board of Land Commissioners (Land Board) for their consideration as amendments to the Plan.

IDL will also utilize monitoring results to make any recommendations to the Land Board for their consideration as amendments to the Plan.

## **6. Anthropogenic Disturbance**

Impacts caused by anthropogenic disturbances on sage-grouse can vary depending on the type of activity and local habitat conditions. In addition, cumulative impacts of multiple activities can have significant, negative impacts on sage-grouse populations. In the *Administrative Draft Proposed Plan*, the BLM utilizes a 3% disturbance limit across all landowners within eight BSU areas. Because state endowment trust lands make up such a small percentage of Core and Important habitat zones, IDL will not place a disturbance limit within any defined areas on state endowment trust lands.

## **7. Mitigation**

At this time, the State of Idaho has not finalized a mitigation plan, nor has there been any funding sources identified or allocated to implement such a mitigation plan. Idaho's proposed mitigation plan is described in the "Framework for Mitigation of Impacts from Infrastructure Projects on Sage-grouse and Their Habitats" (Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse Advisory Committee, December 2010).

IDL will commit to following Idaho's mitigation plan once fully developed to the extent adequate funding exists.

### **Plan Format**

The Plan format uses 2 PARTS. PART I presents the conservation measures IDL will implement in its authorizing documents (e.g. leases) for third party activities on state endowment trust lands. In addition, PART I identifies activities to be undertaken by IDL as the land manager related to fire prevention, wildfire suppression, and land transactions (e.g. land exchanges).

PART II presents the conservation measures IDL will recommend as voluntary best management practices for mining operators and oil and gas operators on non-state lands. In addition, PART I identifies activities to be undertaken by IDL under its statutory roles regarding fire prevention, wildfire suppression, and abandoned mine land reclamation.

Each Part then follows the numbered headings used in the USDI Bureau of Land Management (BLM) *Administrative Draft Proposed Plan* as an organizational outline and reader courtesy.

**TABLE 1.1 IDL Ownership within Sage-grouse Habitat by Conservation Area and Habitat Zones**

		<b>Total Acres All Owners</b>	<b>Total IDL Ownership</b>		<b>IDL Surface Ownership</b>		<b>IDL Minerals Ownership Only</b>	
Conservation Area	Habitat Zone	Acres	Acres	%	Acres	%	Acres	%
Idaho Desert	Core	1,017,180	31,702	3.12	29,853	2.93	1,849	0.18
	Important	1,064,653	43,510	4.09	38,710	3.64	4,800	0.45
	Total	2,081,833	75,212	3.61	68,563	3.29	6,649	0.32
Idaho Mountain Valleys	Core	2,110,685	177,006	8.39	164,286	7.78	12,720	0.60
	Important	1,602,894	135,004	8.42	120,881	7.54	14,124	0.88
	Total	3,713,578	312,010	8.40	285,166	7.68	26,844	0.72
Idaho Southern	Core	856,442	47,207	5.51	38,352	4.48	8,855	1.03
	Important	1,225,756	70,727	5.77	51,073	4.17	19,654	1.60
	Total	2,082,198	117,934	5.66	89,425	4.29	28,509	1.37
Idaho West Owyhee	Core	2,034,057	133,498	6.56	130,801	6.43	2,697	0.13
	Important	609,354	50,345	8.26	45,616	7.49	4,729	0.78
	Total	2,643,412	183,843	6.95	176,417	6.67	7,425	0.28
All Conservation Areas	CHZ and IHZ	10,521,022	688,999	6.55	619,571	5.89	69,428	0.66

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## **PART I. CONSERVATION MEASURES FOR ACTIVITIES ON STATE ENDOWMENT TRUST LANDS**

For proposed activities by third parties on state endowment trust lands in Core and Important habitat zones, IDL will implement conservation measures as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements.

Also, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to conserve sage-grouse habitat. In addition, IDL will include an analysis of sage-grouse habitat impacts when considering land transactions that are located in Core or Important habitat zones.

### **8. Fire Prevention on Endowment Land**

IDL is committed to conserving habitat for the sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire preparedness and prevention measures that are complementary with the January 5, 2015 US Department of Interior, Secretary of Interior Order Number 3336. This Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

In Idaho, there are 619,571 acres of state endowment trust lands located within Core (363,211 acres) and Important (256,280 acres) habitat zones. These zones contain about 82,000 Animal Unit Months (AUMs) of leased forage. As a primary threat wildland fire has the potential to significantly impact state endowment trust rangelands located in Core and Important habitat zones. Between 2009 and 2014, over 19,000 acres of Core and Important sage-grouse habitat burned on state endowment trust rangelands due to wildland fire. Based on historical averages, about 3,200 acres of state endowment trust rangelands can be expected to burn each year within Core and Important habitat zones with significant impacts to grazing lessees and state endowment trust beneficiaries.

During the 2014 fire season, 2,957 acres of Core Habitat Zone burned on state endowment trust rangelands making 470 AUMs of livestock forage unavailable for one to two years. In 2014, Core habitat restoration costs on 2,088 acres of those state endowment trust lands totaled nearly \$45,000. Left unaddressed, the primary threat of wildland fire within Core and Important habitat zones on state endowment trust rangelands is expected to continue at the same rate.

The following conservation measures will be incorporated as stipulations for any authorizing documents issued within Core and Important sage-grouse habitat:

**8.1.** Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, Rangeland Fire Protection Associations, and Federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

**8.2.** Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.

**8.3.** Authorized parties will ensure that field personnel are aware of:

- a. fire prevention and emergency response plan,
- b. evacuation routes and procedures,
- c. designated safety meeting places, and
- d. emergency shutdown procedures.

**8.4.** Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

## **9. Wildfire Suppression on Endowment Land**

IDL is committed to conserving habitat for sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire suppression guidance that is complementary with the January 5, 2015 US Department of Interior, Secretary of Interior Order Number 3336. This Order from Secretary Jewell sets forth enhanced policies and strategies for suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

None of IDL's fire districts have suppression responsibilities within any currently identified Core or Important habitat zones. Likewise, as of December 2014, none of IDL's fire districts have suppression responsibilities within any currently identified General habitat zone. When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incidents within sage-grouse habitat, they will utilize that agency's best management practices as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing.

For extended attack fires involving state endowment trust rangelands, in or near Core or Important habitat zones:

**9.1.** IDL may assign a Resource Advisor (primarily a Resource Specialist-Range) to provide local information regarding sage-grouse habitat during the in-brief and continually throughout the incident. The Resource Advisor will also be engaged with the incident to assess sage-grouse habitat that may be affected by the fire or suppression activities.

## **10. Fuels Management on Endowment Land**

Wildfires in a rangeland ecosystem can grow quickly and affect hundreds of thousands of acres of sage-grouse habitat in a matter of days or within a single burning period. Due to rapid fire spread, the potentially long response times due to remoteness, and limited sites for firefighters to establish safe anchor points to engage wildfires in some of these areas, these fires can be difficult to manage. Additionally, only one of the three legs of the fire triangle (fuel, oxygen, and heat) can be modified, which is fuel. This is why fuels management is a key in wildfire control in sage-grouse habitat.

**10.1.** Unless otherwise specified as part of a land use plan, IDL will consider the full array of fuels management treatment types (prescribed fire, mechanical, chemical, and biological) when implementing Conservation Measures and Best Management Practices on state endowment trust rangelands.

**10.2.** Where applicable IDL will design fuels treatment objectives on state endowment trust rangelands to protect existing Core and Important habitat zones, modify fire behavior, restore native plants, and create landscape patterns to benefit sage-grouse habitat, as resources permit.

**10.3.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to use proper livestock management and targeted grazing as a treatment to reduce vegetative fire fuels, reduce annual grass densities, and to protect Core and Important habitat zones.

**10.4.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit.

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**10.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically implement brush management treatments and rehabilitate annual grasslands to reduce vegetative fire fuels within and to protect Core and Important habitat zones, as resources permit.

**10.6.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically establish fuel breaks along existing roads and other disturbances to protect Core and Important habitat zones; identify and target higher-risk roads for fuel break construction and maintenance based on fire history maps. Fuel breaks to include annual monitoring and maintenance.

- a. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015)*
- b. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014)*

**10.7.** IDL will analyze the cost benefit of fuel breaks in relation to additional loss of sage steppe habitat, increased forage with green stripping, increased cost/risk of controlling invasive weeds in brown stripping, and cost of annual fuel break monitoring and maintenance.

**10.8.** IDL will authorize private, state and federal contractor fuel break construction across IDL managed land.

## **11. Wildfire Restoration and Rehabilitation on Endowment Land**

Wildfire restoration/rehabilitation is essential for conserving sage-grouse habitat. The increasing frequency and intensity of rangeland fire poses a significant threat to habitat as well as increasing opportunity for the accelerated invasion of non-native annual grasses, in particular cheatgrass and medusahead rye, and the spread of pinyon-juniper across the sagebrush-steppe ecosystem. By quickly taking action to restore/rehabilitate following wildfire, this opportunity is decreased as we increase the likelihood of native vegetation reestablishing.

**11.1.** IDL will form partnerships, agreements, and cooperate with lessees, working groups, and other federal, state, county and private partners in post-fire restoration treatments of Core and Important habitat zones on state endowment trust rangelands damaged by fire.

- a. *Draft BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015)*

## **12. Habitat Restoration and Vegetation Management on Endowment Land**

**12.1.** As resources permit, IDL will give high priority to vegetation restoration, rehabilitation or manipulation projects that include:

- a. Cooperative efforts that may improve Core and Important habitat zones over multiple ownerships.
- b. Projects that may provide connectivity between suitable habitats or expand existing good quality habitat within Core and Important habitat zones on state endowment trust rangelands.
- c. Sites where environmental variables contribute to improved chances for project success.
- d. Projects that address conifer encroachment within Core and Important habitat zones. Priority for treatment as Phase 1 (<10% conifer cover), Phase 2 (10-30%), and Phase 3 (>30%).



- e. Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial, or other techniques to re-establish desired species.
- f. Re-establish sagebrush cover on recently burned native areas within suitable Core and Important habitat zones, with consideration to state endowment trust rangeland forage productivity, local needs and conditions.

**12.2.** Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.

**12.3.** Use available plant species based on their adaptation to the site when developing seed mixes.

**12.4.** Use post-treatment control to reduce annual grass densities, invasive and noxious weed competition through targeted livestock grazing and herbicide applications.

### **13. Invasive Plant Species on Endowment Lands**

Exotic annual grasses and other invasive plants alter habitat suitability for sage-grouse by reducing or eliminating native forbs and grasses essential for food and cover. Exotic annual grasses, in particular cheatgrass and medusahead rye, also facilitate an increase in mean fire frequency. For Idaho endowment trust lands, the following five conservation measures for invasive plant species will be applied through lease stipulations or other recordable instrument stipulations.

**13.1.** All vehicles and equipment that will travel off approved/designated transportation routes or will be utilized during operations will be cleaned to prevent the spread of seeds and propagules.

**13.2.** Weeds will be inventoried and monitored pre-disturbance by the lessee, and throughout the life of the project.

**13.3.** Reclamation activities will include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) will be certified weed free by the appropriate Federal or State of Idaho agency.

**13.4.** Authorized parties will use Idaho licensed professional applicators to treat any noxious weed with the appropriate, approved, and properly-documented herbicides. Weeds will be treated promptly whenever they are located on a project site.

## **14. Infrastructure Development/ Lands and Realty on State Endowment Trust Land**

Infrastructure development on state endowment trust lands can vary from minor road or fencing construction to utility-scale renewable energy facilities including wind farms, geothermal power plants, and solar power plants. These developments regardless of their size can have a measurable and substantial impact on sage-grouse and their habitat. All infrastructure developments require some form of road construction to deliver materials for construction and perform regular maintenance to facilities. These roads are often graded gravel roads and are maintained periodically for easy access to sites. Other smaller roads are developed for access to geothermal well pads, wind turbines, or pipelines. Roads may also be necessary for third-party access to private or federal lands.

Transmission lines must be built in order to harness power from wind turbines, geothermal sites, or solar sites. Additionally, fences are often erected to protect facilities such as turbines or substations from vandalism. These features all have the potential to directly, or indirectly, affect sage-grouse at multiple scales and over time.

IDL's assessment of the potential for renewable energy development to occur on state endowment trust lands located in Core and Important sage-grouse habitat zones is very low. However, any proposed development will be required to comply with the conservation measures identified in the following sections. These same conservations measures will also be included as stipulations in rights-of-way, when IDL authorizes parties to access other lands by using state endowment trust lands.

### **14.1. Surface Use and Timing**

**14.1.1.** Controlled surface use and timing limitations will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.

**14.1.2.** No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones.

**14.1.3.** During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse.

**14.1.4.** Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **14.2. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season.

Ambient noise levels will be determined by measurements taken at the perimeter of a lek at sunrise.

### **14.3. Fencing**

**14.3.1.** New and existing wire fence segments constructed by authorized parties within Core and Important habitat zones will be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).

**14.3.2.** As feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

### **14.4. Water Supply Structures**

**14.4.1.** New or modified spring developments (including pipelines) should be designed by authorized parties to enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.

**14.4.2.** The construction of new ponds or reservoirs by authorized parties will be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. For necessary livestock water, non-pond or non-reservoir watering facilities, such as free-flowing troughs and “bottomless” tanks, will be maintained or developed.

**14.4.3.** Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be developed to facilitate the use of and escape by wildlife.

### **14.5. Constructed Improvements**

**14.5.1.** Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

**14.5.2.** Infrastructure will be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.

**14.5.3.** Surface disturbances will be clustered in order to limit surface occupancy.

**14.5.4.** New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.

**14.5.5.** Transmission towers will be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.

**14.5.6.** Newly-constructed structures with a height over five feet (e.g. corrals, loading facilities storage tanks, windmills) will not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.

**14.5.7.** Construction plans developed by authorized parties will include options that deter raptor perching and raven nesting on elevated structures.

**14.5.8.** Permanent structures that create movement will be minimized within Core and Important habitat zones.

**14.6. Site Reclamation** (non-fire related rehabilitation/reclamation)

**14.6.1.** Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed.

**14.6.2.** Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.

**14.6.3.** Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

**Transition Lands/Land Tenure**

IDL considers opportunities to sell, purchase, develop, or exchange state endowment trust lands to meet its constitutional mandate to maximize long term returns to the owning beneficiaries by diversifying land holdings, maximizing the rate of return to the trusts, improving public access to state trust lands, and consolidating state trust lands for more efficient management. In order to accomplish these objectives, IDL must be able to maintain the flexibility to move lands into and out of the identified habitat zones. Lands identified for potential ownership changes are termed “transition lands.”

The ultimate decision authority for determining to auction or exchange state endowment trust lands lies with the Land Board. IDL commits to providing the Land Board relevant data and analysis to inform them on potential impacts to sage-grouse habitat of land transitions within Core or Important sage-grouse habitat zones through the following Conservation Measures.

**14.7.** Any tract proposed for sale or exchange within Core or Important habitat zones will include an analysis on the impact to sage-grouse habitat resulting from the transition. This analysis will include, but not limited to:

- Acres in and percentages of Core and Important habitat zones.
- Quality/type of habitat (number of leks, breeding, nesting, early brood rearing, summer/late brood rearing, fall, winter).
- Any knowledge of new owner's implementation/commitment for sage-grouse conservation measures to estimate overall impact to sage-grouse habitat conservation.
- Idaho Fish and Game Comments.

**14.8.** New state endowment trust lands acquired within the Core and Important habitat zones will be managed according to IDL's sage-grouse Conservation Measures.

## **15. Mineral Leasing on Endowment Land**

For all mineral leasing activities on state endowment trust lands, conservation measures for the sage-grouse will be applied through lease stipulations or other recordable instrument stipulations that are enforceable. Mineral leasing can be slightly more complex due to the potential for split estate scenarios, where the surface owner is different than the mineral estate owner. In these cases, IDL would still include conservation measures as lease stipulations when leasing involves only the mineral estate (where the endowed beneficiary is not the surface owner).

### **15.1. Fluid Mineral Leasing on Endowment Land**

For state endowment trust lands, the following oil and gas lease stipulations will be included in the lease document and advertised prior to lease auction on tracts within Core and Important habitat zones

#### **15.1.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **15.1.2. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of a lek at sunrise.

### **15.1.3. Fencing**

New wire fence segments constructed by authorized parties within Core and Important habitat zones will be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).

### **15.1.4. Water Supply Structures**

Wildlife escape ramps in new open-water storage tanks will be developed to facilitate the use of and escape by wildlife.

### **15.1.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances will be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Transmission towers will be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- f. Newly-constructed structures with a height over five feet (e.g. loading facilities, storage tanks) will not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.
- g. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- h. Permanent structures that create movement, such as pump jacks will be minimized or hidden within Core and Important habitat zones.

### **15.1.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native

- forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **15.2. Mining Activities On State Endowment Trust Lands**

Mineral leasing and any subsequent mining activities on state endowment trust lands require authorization and oversight by IDL. IDL uses written procedures, including mineral lease pre-auction inspections, quarterly or yearly mineral lease inspections, and mineral lease enforcement to ensure compliance by authorized parties. The following conservation measures will be incorporated into the IDL mineral leases that are in Core and Important sage-grouse habitat zones.

### **15.2.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **15.2.2. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of a lek at sunrise.

### **15.2.3. Fencing**

New wire fence segments constructed by authorized parties within Core and Important habitat zones will be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).

#### **15.2.4. Water Supply Structures**

Wildlife escape ramps in new open-water storage tanks will be developed to facilitate the use of and escape by wildlife.

#### **15.2.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances will be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Transmission towers will be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- f. Newly-constructed structures with a height over five feet (e.g. loading facilities, storage tanks) will not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.
- g. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- h. Permanent structures that create movement, such as pump jacks will be minimized or hidden within Core and Important habitat zones.

#### **15.2.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **16. Range Management/Livestock Grazing**

Grazing has been determined to not be a primary threat to sage-grouse in Idaho, but the measures listed above in 13. and 14. will also apply to grazing leases.



## **17. Wild Horses and Burros**

No direct measures, this item included to maintain sequential numbering system utilized for the BLM *Administrative Draft Proposed Plan*.

## **18. Travel Management**

**18.1.** On site traffic should be reduced by use of telemetry and other remote sensing tools.

**18.2.** During operations, existing roads or trails should be employed and activities should be contained as close to existing roads and trails as feasible.

**18.3.** Roads should be designed by authorized parties to an appropriate minimum standard necessary to accommodate their intended purpose.

**18.4.** Road crossings should be constructed by authorized parties at right angles to ephemeral drainages and stream crossings.

## **19. Recreation**

Recreation has been determined to not be a primary threat to sage-grouse in Idaho, but the measures listed above in 13. and 14. will also apply to recreation leases.

## **20. Implementation and Monitoring**

Implementation of the conservation measures through lease/permit/easement stipulation will be incorporated into existing lease/permit/easement issuance procedures. A copy of the applicable conservation measures will be provided to all interested applicants for a lease, permit or easement on state endowment trust lands located in Core or Important habitat zones, so the applicant is informed of the expected requirements when entering the application process. The conservation measures will be incorporated into the authorizing document either directly or by separate addendum.

Monitoring of conservation measures required through lease/permit/easement stipulation will be incorporated into existing lease/permit inspection procedures. Inspection forms will be amended to include a section for documenting that conservation measures were implemented and an assessment of their effectiveness.

Procedures for land transactions will be amended to include an analysis of the impacts on sage-grouse when the transaction includes transition lands within Core or Important habitat zones. The results of this analysis will be included in the information provided to the Land Board for their review of the proposed transaction.

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## **PART II. CONSERVATION MEASURES FOR IDL ACTIVITIES IN THE FIRE PROGRAM AND FOR REGULATED ACTIVITIES IN THE OIL & GAS AND MINERALS PROGRAMS**

For regulatory and assistance activities, conservation measures will be voluntary best management practices on private land because IDL does not have the statutory authority within its regulatory or assistance programs to require adoption by authorized parties. Regulatory and assistance activities include: Abandoned Mine Lands Projects; Dredge and Placer Mine Permits; Mine Reclamation Plan Approvals; and Oil & Gas Permits (seismic imaging surveys, well drilling).

In addition, IDL has roles and responsibilities in its fire program where conservation measures will be implemented by IDL to address conservation of sage-grouse habitat in Core and Important habitat zones.

### **8. Wildfire Preparedness/Prevention**

IDL is committed to conserving habitat for the greater sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed the following wildfire preparedness and prevention conservation measures that are complementary with the January 5, 2015 US Department of Interior, Secretary of Interior Order Number 3336. This Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

**8.1.** IDL will continue to support the ongoing operations of taxing and non-taxing fire districts in Idaho, when requested and as available, through equipment acquired through the Federal Excess Personal Property (FEPP) program and Firefighter Property (FFP) program, and through Volunteer Fire Assistance (VFA) grant fund allocations.

**8.2.** IDL will continue to support the formation and ongoing operations of Rangeland Fire Protection Associations (RFPAs) through the South Idaho Fire Liaison Program. This position is the point of contact for any needs or issues raised by RFPAs and their cooperators. The position coordinates information needs on an annual cycle as well as facilitating an annual meeting for all RFA Board of Directors and their cooperators, held following fire season.

**8.3.** IDL will continue to support the formation and operation of RFPAs through start-up funding that provides personal protective equipment, radios, firefighting equipment, and training materials.

**8.4.** IDL will continue to utilize burning permits (per Idaho Code 38-115, Rule IDAPA 20.04.01.060) during the designated closed fire season as a fire prevention and control tool. Burning permits acquaint the permit holder with the laws and requirements for safe burning. During times of critical fire hazard, all burning may be stopped by the suspension of burning permits. Closed fire season provides for public safety and the protection of land resources by ensuring that all burning operations which may occur during periods of high fire danger are conducted under safe conditions and in such manner that the danger of uncontrolled fire spread is minimized.

**8.5.** IDL will continue to participate in the Idaho Fire Restrictions Plan (per Idaho Code 38-115, Rule IDAPA 20.04.01.060; IDAPA 20.04.01.070; IDAPA 20.04.01.090; and IDAPA 20.04.01.120), which is an interagency document that outlines coordination efforts regarding fire restrictions and closures. The purpose of fire restrictions is to reduce the risk of human-caused fires during unusually high fire danger and/or burning conditions. An interagency approach for initiating restrictions or closures helps provide consistency among the land management partners, while defining the restriction boundaries so they are easily distinguishable to the public.

## **9. Wildfire Suppression**

None of IDL's fire districts have suppression responsibilities within any currently identified Core or Important habitat zones. Likewise, as of December 2014, none of IDL's fire districts have suppression responsibilities within any currently identified General habitat zone. When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incidents within sage-grouse habitat, they will utilize that agency's best management practices as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing.

## **10. Fuels Management**

IDL does not have general regulatory authority over fuels management on non-state rangelands.

## **11. Wildfire Restoration and Rehabilitation**

IDL does not have general regulatory authority over wildfire restoration and rehabilitation on non-state rangelands.

## **12. Habitat Restoration and Vegetation Management**

IDL has limited authority to regulate habitat restoration and vegetation management, but will address vegetation management through voluntary BMPs and permit stipulations. See section 15.

### **13. Invasive Plant Species**

IDL has limited authority to regulate invasive species, but will address invasive species management through voluntary BMPs and permit stipulations. See Section 15.

### **14. Infrastructure Development**

IDL has limited authority to regulate infrastructure development, but will address infrastructure development through voluntary BMPs and permit stipulations. See Section 15.

### **15. Minerals**

#### **15.1. Fluid Minerals**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse habitat zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist.

#### **15.1.2. Oil and Gas Activities – Regulatory Compliance**

The IDL is the administrative arm of the Idaho Oil and Gas Conservation Commission (Commission) pursuant to § 47-319(2) which states that the commission is authorized to; "...regulate the exploration for and production of oil and gas, prevent waste of oil and gas and to protect correlative rights, and otherwise to administer and enforce this act. It has jurisdiction over all persons and property necessary for such purposes. In the event of a conflict, the duty to prevent waste is paramount." Under this authority, § 47-321 provides for the commission to establish spacing units which are legally described boundaries overlaying the resource and set a fixed acreage per well, with the well located in the center of the boundary. § 47-321(b) states that these spacing units are established by the Commission in order to; "...result in the efficient and economical development of the pool as a whole..."

At this time for conventional drilling techniques, the default spacing, set by the Commission, is 640 acres for gas and 40 acres for oil. As surface use restrictions grow, the Commission could see requests to modify the default spacing unit in order to limit surface disturbance. As the Commission receives these requests, IDL will provide sage-grouse habitat data so that the Commission, if it chooses, can incorporate such information into its decision establishing a new spacing unit.

The best management practices (BMPs) listed below will be provided to all applicants seeking permit issuance for operations in Core or Important sage-grouse habitat zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a stipulation in the permit.

#### **15.1.2.1. Oil and Gas Activities**

The following BMPs will be provided to all operators making application to drill a well, treat a well, or conduct seismic explorations in Core or Important habitat zones.

##### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, Rangeland Fire Protection Associations, and Federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.
- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

## **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized during operations will be cleaned before and after entry to prevent the spread of seeds and propagules.
- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties should use Idaho licensed professional applicators to treat any noxious weed with the appropriate, approved, and properly-documented herbicides. Weeds should be treated promptly whenever they are located on a project site.

## **c. Surface Use and Timing**

- i. Conventional well activity and exploration will not be conducted within 0.6 miles of an active lek.
- ii. All pipelines and collector lines will be emplaced utilizing horizontal boring methods with a minimum setback of 0.6 miles of a lek.
- iii. Construction of pipelines will be in accordance with seasonal stipulations regarding no operations or construction from March to July.
- iv. Pipeline maintenance will not be conducted between 6 a.m. to 8 a.m., except in an emergency situation.
- v. Compressor stations and other vital operations shall be placed a minimum of 0.6 miles from a lek.

## **d. Noise**

- i. Noise on permitted well sites will be at or below 65db threshold from March to July, within 0.6 miles of an active lek.
- ii. Noise levels may be exceeded for emergency situations including well control and threats to freshwater resources.

### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties within Core and Important habitat zones should be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).
- ii. As feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

### **f. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- vi. Newly-constructed structures with a height over five feet (e.g. storage tanks, buildings) should not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- viii. Permanent structures that create movement should be minimized within Core and Important habitat zones.

## **g. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **15.2. Abandoned Mine Lands Program**

This program operates on private, federal, and state lands. IDL works with landowners to address safety closures of dangerous mine openings and reclaim areas to protect human health. Reclamation is also performed to improve water quality and wildlife habitat. IDL develops and controls these projects, and can incorporate sage-grouse conservation measures into the projects. Abandoned mine land projects will implement the following best management practices within Core and Important sage-grouse habitat zones.

### **a. Wildfire Prevention**

- i. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- ii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iii. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

### **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized



during operations will be cleaned before and after entry to prevent the spread of seeds and propagules.

- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties should use Idaho licensed professional applicators to treat any noxious weed with the appropriate, approved, and properly-documented herbicides. Weeds should be treated promptly whenever they are located on a project site.

#### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **d. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of a lek at sunrise.

#### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties within Core and Important habitat zones should be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).

- ii. As feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. For necessary livestock water, non-pond or non-reservoir watering facilities, such as free-flowing troughs and “bottomless” tanks, should be maintained or developed.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be developed to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.

- vi. Newly-constructed structures with a height over five feet (e.g. storage tanks, buildings) should not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- viii. Permanent structures that create movement should be minimized within Core and Important habitat zones.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **15.3. Mining Regulatory Program**

This program operates on private, federal, and state lands and covers all dredge and placer mining and surface mining operations. Activities classified as exploration, such as drilling or trenching, only require a notification to IDL. Dredge and placer mining operations over ½ acre require a permit and bond. Surface mining operations that produce materials for immediate or ultimate sale require a reclamation plan and bond. Coordinated reviews with Idaho Department of Environmental Quality, Idaho Department of Water Resources, and Idaho Department of Fish and Game are required for operations that may impact water quality.

The best management practices listed below will be provided to all applicants seeking reclamation plan approval or permit issuance for mining operations in Core or Important sage-grouse habitat zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a condition of reclamation plan or permit approval.

To further contribute to conservation of sage-grouse habitat, IDL will also coordinate with Idaho Department of Fish and Game to evaluate existing mines and their potential impact on sage-grouse habitat. The following best management practices will be suggested to these mine operators. IDL will also work with Idaho Department Fish and Game to develop an informational brochure for new mine operators so they may consider adopting these best management practices into their proposed operations.

### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, Rangeland Fire Protection Associations, and Federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.
- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

### **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized during operations will be cleaned before and after entry to prevent the spread of seeds and propagules.
- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties should use Idaho licensed professional applicators to treat any noxious weed with the appropriate, approved, and properly-documented herbicides. Weeds should be treated promptly whenever they are located on a project site.

### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### **d. Noise**

- i. Limit noise levels from discretionary activities within Core and Important habitat zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before to 2 hours after sunrise and sunset during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of a lek at sunrise.
- ii. Authorized party will keep noise levels on existing infrastructure within the 0.6 mile buffer to 65 decibels or less.

### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties within Core and Important habitat zones should be marked with collision-diverter fence markers, as defined by National Resources Conservation Services (NRCS) design practices (Stevens, 2011).
- ii. As feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. For necessary livestock water, non-pond or non-reservoir watering facilities, such as free-flowing troughs and “bottomless” tanks, should be maintained or developed.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be developed to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- vi. Newly-constructed structures with a height over five feet (e.g. storage tanks, buildings) should not be constructed by authorized parties within line-of-sight or at least 2 km of occupied leks.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.

- viii. Permanent structures that create movement should be minimized within Core and Important habitat zones.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### **16. Range Management/Livestock Grazing**

IDL does not have general regulatory authority over livestock grazing on non-state lands.

### **17. Wild Horses and Burros**

IDL does not have regulatory authority over wild horses and burros.

### **18. Travel Management**

IDL does not have general regulatory authority over travel management on non-state lands.

### **19. Recreation**

IDL does not have general regulatory authority over recreation on non-state lands.

### **20. Implementation and Monitoring**

Implementation of the conservation measures through voluntary agreement will be incorporated into existing permit procedures. A copy of the applicable conservation measures will be provided to all applicants for a permit on lands located in Core or Important habitat zones. As part of the application, applicants will acknowledge which, if any, conservation measures they are willing to voluntarily comply with. Those conservation measures will then be incorporated into the permit as an enforceable stipulation of the permit.

Monitoring of conservation measures stipulated in the permit will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include a section for documenting that conservation measures were implemented and an assessment of their effectiveness.

Procedures for Abandoned Mine Lands projects will be amended to include an assessment of the impact on sage-grouse when the project includes lands within Core or Important habitat zones. The results of this assessment will be used to determine the appropriate conservation measures to be implemented as part of the project.

DRAFT



plan, including the IDL plan nested within the broader state effort, and conservation measures outlined by ten other western states and regulatory mechanisms for federal lands in the states, before it makes a decision whether to list sage-grouse under the ESA.

###

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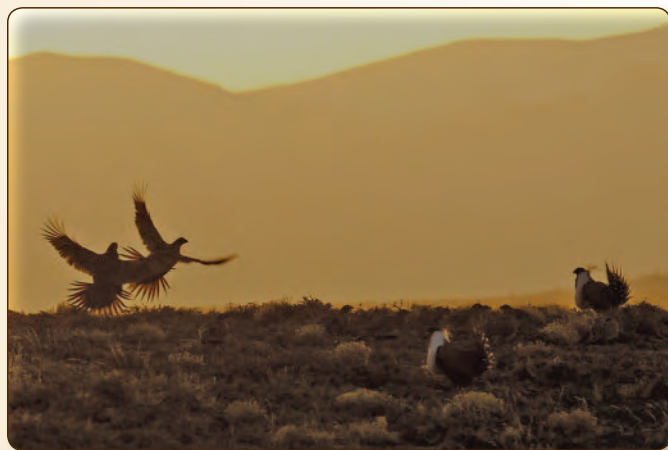


# Birds of a Feather

*Information contained in feathers is helping to understand sage-grouse populations*

## Feather Collecting on a Grand Scale

Dawn breaks over an expansive Nevada sagebrush landscape, disturbed only by the rumbling of a truck moving along U.S. Route 50. It is late April and prime time for sage-grouse mating. The biologist driving the truck is headed to a communal breeding ground for sage-grouse known as a lek. After taking several side roads, she parks and walks a short distance to a relatively flat, nondescript opening in the sagebrush landscape. The day's round of mating is over, the shuffles and scuffles have ended, and the birds have dispersed for the day. Feathers lost during the dust-ups between males are the main object of the biologist's visit. She collects 20 feathers, packaging each in a labeled envelope and placing the stack in her pack before heading to the next lek. She is part of a team collecting feathers from more than 7,000 leks spread across 11 Western States and 2 Canadian provinces. The feathers contain genetic information, which when extracted and analyzed, will reveal information about movement patterns and population structure useful for management of greater sage-grouse throughout their North American range. The biologist and this project are part of a much larger integrated effort helping to solve one of the most difficult ecological challenges in North America.



Greater sage-grouse gather in groups at a lek to court and mate with females. (Photograph taken by T. Gettelman, USGS, Western Ecological Research Center, March 30, 2012.)

## A Complex Conservation Challenge

Greater sage-grouse (*Centrocercus urophasianus*, hereafter sage-grouse) are broadly distributed, occupy a diversity of sagebrush habitats, and face multiple threats. As a result of these threats, sage-grouse populations are declining and are now absent from almost one-half of their estimated range prior to Euro-American settlement. The risks to sage-grouse are

### General facts about greater sage-grouse

- Largest grouse species in North America
- Resident bird managed by state agencies as a native game bird
- Uses communal breeding grounds called leks
- Ground nesting, usually underneath a sagebrush and concealed by grass
- Sagebrush dependent, particularly in winter
- Occurs in 11 States and 2 Canadian provinces, across a range that spans 259,000 square miles
- Annual home-range size can cover 230 square miles or more
- Seasonal ranges can be widely dispersed
- Routinely monitored by state management agencies by counting males at lek sites

### General facts about sagebrush

- Most widespread vegetation in Western North America
- Dominant land cover on more than 190,000 square miles within sage-grouse range
- Includes 18 woody plant species of various shapes and sizes
- Co-occurs with native grasses and forbs as a shrub steppe system
- Essential habitat for 350 species, including sage-grouse
- In jeopardy due to altered fire regimes, invasions of nonnative plants, encroachment of trees, anthropogenic land uses, and climate change
- More than 70 percent of sagebrush habitats used by sage-grouse are on public lands managed by Federal or State agencies

significant enough to merit candidate status for this species for listing under the U.S. Endangered Species Act (Federal Register Notice, March 5, 2010). According to this decision by the U.S. Fish and Wildlife Service in 2010, population and habitat fragmentation coupled with lack of regulatory mechanisms warranted listing, although implementation of actions has been precluded by other priorities.

Candidate status for listing under the Endangered Species Act and possible regulatory action in the near future provide strong motivation to better understand the dynamics of sage-grouse populations and their habitat requirements. The general approach currently taken by managers focuses on maintaining or enhancing sage-grouse populations across their distribution in regions containing the highest densities of breeding birds and their important seasonal habitats, also known as priority areas for conservation (PACs). The rationale behind this approach is that it permits limited resources to be applied in regions that have the greatest potential to benefit the largest proportion of sage-grouse. Development and other forms of land use can then proceed under standard regulations in areas outside PACs. Implementation of this approach requires detailed information about habitat, connections among sage-grouse populations, and approaches to restore and maintain sagebrush. These are important topics of study by the U.S. Geological Survey (USGS) and its research partners.

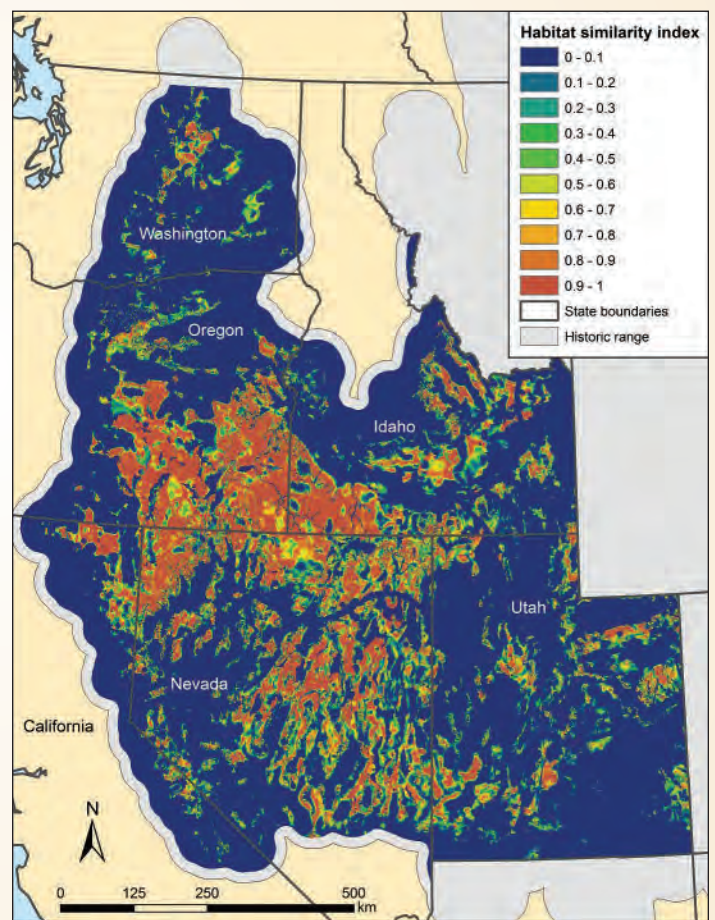
### Minimum Ecological Requirements

Efforts to stabilize or reverse population and habitat declines as well as minimize effects from land use and climate change would benefit from accurate maps delineating where suitable habitats occur, including movement corridors between populations. Defining what constitutes suitable habitat is an essential step toward these goals.

Sage-grouse require sagebrush-dominated landscapes for cover, food, and water. However, not all sagebrush supports sage-grouse because not all sagebrush landscapes are alike. For example, sagebrush can be a dominant feature across large landscapes, as in many parts of Idaho and Oregon, or it can be mixed with agriculture and other habitats, as in parts of Washington and Montana. Site-specific sage-grouse distribution models have contributed to the understanding of relationships between sage-grouse and their habitat. However, translating these habitat relationships into the broad regional maps useful for managers is restricted by limited availability of accurate, consistent data spanning large areas. To alleviate this situation, researchers developed a habitat model for sage-grouse that captured the spatial variability in local environments used by



Some sagebrush landscapes are dominated by sagebrush, but others may be a mosaic of sagebrush and other habitats. (Photograph taken by Steve Knick, USGS, July 2006.)



**Figure 1.** Habitat similarity index values for sage-grouse across their western range. Values represent the relationship of the surrounding environment at map locations to a model of minimum requirements for sage-grouse defined by land cover, anthropogenic variables, soil, topography, and climate (from Knick and others, 2013).



sage-grouse and also maximized accuracy in applications across broad spatial extents (Knick and others, 2013). This was done by examining the environment surrounding active leks within the western portion of the current sage-grouse range. Leks were used as the basis for developing these models because they are important breeding locations and most females nest within the surrounding region.

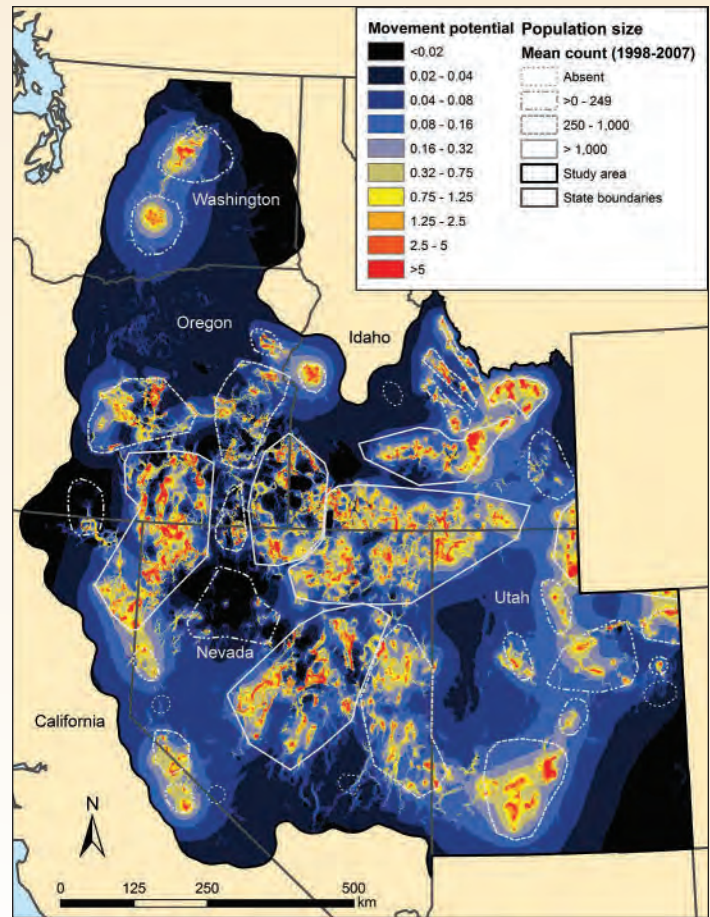
The importance of sagebrush as required habitat for sage-grouse was affirmed by the assessments made on the environments in which leks were found. The majority of leks occurred where there was at least 40 percent of the surrounding landscape dominated by sagebrush. Most of these leks also contained minimal to no levels of human land use and were further characterized by broad expanses of sagebrush. Other forms of vegetation and climate also influenced lek location. Almost all leks were located in areas containing few conifer trees and few grassland expanses. These results were consistent with other evidence that sage-grouse are vulnerable to decreases in sagebrush due to the spread of invasive plants and the encroachment of junipers and conifer trees.

This is important information for managers because the characteristics identified in the analyses represent the most essential environments required by sage-grouse (table 1) that can be used to target conservation actions (fig. 1)

### Population Connectivity

Another challenge for managers of sage-grouse and sagebrush habitats is the potential for human activities to further fragment sagebrush habitat and increase isolation of individual sage-grouse populations. In general, species with multiple interconnected populations are more likely to persist than those with isolated populations. For sage-grouse, leks and the large populations within the interior of their range are highly interconnected by corridors of surrounding lands that had moderate-to-high potential for animal movement. In contrast, smaller populations along the range periphery are isolated and had limited movement potential through habitat corridors to neighboring populations (fig. 2; Knick and others, 2013). This information can be used to consider how habitat changes in the connecting corridors that limit or disrupt sage-grouse movement could further isolate peripheral populations, putting them at greater risk of loss. By developing maps of these habitat corridors, areas critical for connecting sage-grouse populations can be targeted for conservation.

Documenting and addressing how populations actually interact is the next step, and that requires monitoring of animal movement across large areas. This process can be costly and difficult using methods that involve capture, marking, and re-capture. However, the critical information about dispersal and gene flow in sage-grouse populations can be obtained from the DNA coded in the sage-grouse feathers collected at leks.



**Figure 2.** Estimated potential for sage-grouse movement among sage-grouse leks (from Knick and others, 2013).

Monitoring using genetic information is now underway across the entire range of sage-grouse through the efforts of a large consortium of scientists and managers.<sup>1</sup> The biologist mentioned at the beginning is contributing to this effort by collecting feathers. The genetic data extracted from the collected feathers is used to map relatedness among breeding locations and delineate population structure within the range of sage-grouse. When coupled with habitat maps and movement corridors, this genetic data can further the understanding of how geographic distance, topographic characteristics, and land use influence sage-grouse dispersal and genetic diversity. A comprehensive picture emerges of where the pathways for dispersing individuals are located throughout the sage-grouse range and how those pathways will shift in the future.

<sup>1</sup>This research involves the USGS, the Natural Resources Conservation Service through the Sage-Grouse Initiative, the Western Association of Fish and Wildlife Agencies, the U.S. Department of Agriculture Forest Service, University of Montana, and Colorado State University. For more information, visit <https://my.usgs.gov/feathers/>.

## More on the Horizon

Sagebrush restoration and rehabilitation are additional considerations for sagebrush conservation. Many scientists and managers are addressing these subjects, often with an appreciation that effective restoration will require a regional approach for prioritizing and identifying management options (Pyke, 2011). Sagebrush restoration and rehabilitation are topics too expansive for this fact sheet, but a few points stand out:

- Managers have a great need for scientific data that can help increase their success at restoring and rehabilitating sagebrush. Efforts are underway to acquire this information to create effective guidelines for restoration.
- Spatial models based on land classification are being developed that indicate where to focus resources to best protect and interconnect intact quality habitats through restoration.
- To determine the intensity of future management, models of how plant communities change in sagebrush landscapes can help managers choose between vegetation manipulation and passive management for restoration.

The biologist collecting feathers in the early morning hours at sage-grouse leks appreciates the difficulties associated with understanding sage-grouse and this iconic species' response to management. She is part of a collaborative effort to assemble scientific information for future management decisions. Her work and that of many others can be an important foundation for rigorously and objectively considering options for sage-grouse and sagebrush management so that future generations also will have a chance to head out at dawn over a dusty road in search of sage-grouse.

**Table 1.** Average values of selected environmental variables measured at active lek sites and historical, but not longer used, lek locations in western part of the greater sage-grouse range, U.S.A.

[Adapted from Knick and others, 2013. **Abbreviations:** km, kilometer; km/km<sup>2</sup>, kilometer per square kilometer]

Environmental variables	Active leks (percent)	Historically occupied leks (percent)
Sagebrush land cover within 5 km of lek	79	28
Conifer forest cover within 5 km of lek	1	3
Grassland cover within 5 km of lek	2	10
Agriculture within 5 km of lek	2	2
Power lines	0.03 (km/km <sup>2</sup> )	0.14 (km/km <sup>2</sup> )
Communication towers	0.001 (towers/km <sup>2</sup> )	0.2 (towers/km <sup>2</sup> )



Greater sage-grouse flying to a lek site. (Photograph taken by T. Gettelman, USGS, Western Ecological Research Center, March 28, 2010.)

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## Photo Credits

Banner photograph: A greater sage-grouse male struts at a lek. (Photograph taken by Jeannie Stafford, U.S. Fish and Wildlife Service, March 1, 2010.)

Design: Bill Gibbs

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# Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities

Prepared for  
**Western Energy Alliance**

Prepared by  
**SWCA Environmental Consultants**

July 2014

**Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities**

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**July 2014**

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## **LIST OF ACRONYMS**

- APD – Application for Permit to Drill
- BLM – Bureau of Land Management
- BMP – Best Management Practice
- COA – Condition of Approval
- EA – Environmental Assessment
- EIS – Environmental Impact Statement
- ESA – Endangered Species Act of 1973, as amended
- JIO – Jonah Interagency Office
- MOU – Memorandum of Understanding
- NEPA – National Environmental Policy Act of 1969
- PAPD – Pinedale Anticline Project Office
- PECE - Policy for Evaluation of Conservation Efforts When Making Listing Decisions
- PGH – Preliminary General Habitat
- PPH – Preliminary Priority Habitat
- ROD – Record of Decision
- ROW – Right of Way
- USFS – United States Forest Service
- USFWS – United State Fish and Wildlife Service

## **EXECUTIVE SUMMARY**

Greater sage-grouse (*Centrocercus urophasianus*, hereafter sage-grouse) are large, ground-dwelling birds that reside primarily in sagebrush ecosystems which are ubiquitous across much of the intermountain regions of western North America. The U.S. Fish & Wildlife Service (USFWS) has until September 2015 to determine whether they will list the species under the Endangered Species Act (ESA).

For many years, oil and natural gas companies that operate within sage-grouse range have made significant efforts to avoid, minimize, mitigate, and reduce impacts to the species and its habitat. This report documents the specific conservation measures that companies commit to in Bureau of Land Management (BLM) and U.S. Forest Service (USFS) National Environmental Policy Act (NEPA) decisions on oil and natural gas project approvals. Project NEPA documents specify the terms by which a project is approved, and govern how companies must operate, thereby providing regulatory certainty that sage-grouse conservation measures will be implemented and enforced.

Of the 103 NEPA documents reviewed and summarized in this report, 773 conservation measures were catalogued and an average of 6.5 Conditions of Approval (COA) or conservation measures to protect sage-grouse per project were committed to in the NEPA decision records. For example, via the NEPA documents operators commit to reduce the footprint of development and associated traffic through clustered activity, pad drilling and remote monitoring of producing wells, as well as to implement specific measures to protect the species. Collectively, measures were implemented across 18 BLM Field Offices and National Forests that are responsible for managing 68,404 square miles of public lands with occupied sage-grouse habitat, representing 37 percent of the species' current occupied range and the majority of the range in Wyoming, Colorado, Utah, Montana, and Nevada. These projects represent a sample of NEPA documents and are not exhaustive for all projects in the species' range.

Because Operators commit to these conservation measures via BLM and USFS NEPA decisions, there is regulatory certainty that these conservation measures will be implemented. While there is variability in the measures due to site-specific conditions, project types, rate of development, and well density, the conservation measures that companies commit to result in the conservation and protection of sage-grouse populations or the avoidance and minimization of impacts to the species and its habitat. This demonstrates that oil and natural gas operators are committed to measures that conserve and mitigate impacts to sage-grouse through the NEPA process, which provides a robust regulatory mechanism to protect, conserve, and enhance the status of the species. Given the regulatory certainty that NEPA provides, USFWS should recognize and consider this information on these project commitments as it makes its listing determination for the species.

## **INTRODUCTION**

The sage-grouse is a candidate species for listing under the Endangered Species Act (ESA). Sage-grouse are large, ground-dwelling birds that reside primarily in sagebrush ecosystems which are ubiquitous across much of the intermountain regions of western North America. Sage-grouse population trends are variable across their distribution, and though some populations appear stable, population numbers show long-term declines collectively and in several regions (Connelly et al. 2004).

Much of its range in the western states is overlapped by energy development. The basins where most sagebrush ecosystems reside are also the center of major oil and natural gas reserves (e.g., Green River, Niobrara, Powder River, Uinta-Piceance, and Williston basins), and many of these are on public lands managed by the Bureau of Land Management (BLM) or the U.S. Forest Service (USFS).

On public and split-estate lands (i.e. lands with private or state surface and federal minerals), oil and natural gas operators (Operators) are required to comply with management prescriptions outlined in lease stipulations in BLM Resource Management Plans (RMPs) and USFS Land and Resource Management Plans (LRMPs), as well as Conditions of Approval (COAs) and mitigation measures for project-specific documents prepared in compliance with the National Environmental Policy Act (NEPA). Of the existing 92 BLM RMPs that include sage-grouse habitat, 82 RMPs currently contain specific measures or direction pertinent to management of sage-grouse or their habitats (BLM 2008:1). BLM is currently completing RMP amendments to ensure that measures for conservation and protection of sage-grouse are contained in all planning areas that overlap with the current occupied range of sage-grouse.

Combined, the BLM and USFS manage or have NEPA decision-making authority on more than 60% of the current occupied range of the sage-grouse. As a result of the NEPA decisions made by the BLM, required and consistent COAs, conservation efforts, and avoidance, minimization, and mitigation measures will be applied across the majority of the species' occupied habitat.

BLM manages special status species and the ecosystems upon which they depend on BLM-administered lands in order to reduce threats and minimize the likelihood of listing these species under the ESA (BLM manual 6840). The BLM and USFS currently manage sage-grouse as a sensitive species and have used NEPA as a regulatory mechanism to minimize threats to sage-grouse due to oil and natural gas development within its range. Under Manual 6840 the BLM is instructed to:

- ...conserve and/or recover ESA-listed species and the ecosystems on which they depend so that ESA protections are no longer needed for these species.
- initiate proactive conservation measures that reduce or eliminate threats to [BLM] sensitive species to minimize the likelihood of and need for listing of these species under the ESA.

As a result of the implementation of the guidance contained in BLM Manual 6840, the agency's actions must be evaluated to ensure that decisions made do not lead to the eventual

listing of a sensitive species or degradation of the status of a sensitive species. As a result, the decisions made as part of NEPA processes associated with oil and natural gas development activities as well as all other BLM NEPA decisions are required to comply with Manual 6840, and generally, should not contribute to the listing of a species.

In 2010, the U.S. Fish and Wildlife Service (USFWS) found that the sage-grouse warrants listing as threatened or endangered under the ESA based on anthropogenic habitat impacts and lack of regulatory mechanisms to protect against further losses, but immediate listing action was precluded due to higher priority listing actions. As part of a settlement agreement reached in 2011, the USFWS is now required to make a final listing decision for sage-grouse by September 2015.

Five listing factors provided in Section 4(a)(1) of the ESA are used to determine if a species should be listed as endangered or threatened (Factors A–E; Table 1). Under each listing factor, the USFWS 12-month finding (USFWS 2010) describes several threats to sage-grouse. Some of the primary factors linked to population declines are attributed to habitat loss, habitat fragmentation caused by energy development, invasive species, wildfire, agricultural use, and inadequate regulatory mechanisms.

In the 2010 listing decision, it appears that the USFWS did not review the adequacy of existing regulatory protections provided under NEPA as they relate to the avoidance, minimization, and mitigation of impacts associated with oil and natural gas development.

In preparation for the September 2015 listing decision for sage-grouse and to facilitate a better understanding of the adequacy of NEPA as a regulatory mechanism for protecting and conserving sage-grouse, NEPA documents related to oil and natural gas exploration, development, and production activities within the range of sage-grouse were reviewed. These included RMPs, environmental assessments (EAs), environmental impact statements (EISs), and their associated decision records from across the range of the species, including all BLM field offices and National Forests across Colorado, Montana, Nevada, Utah, and Wyoming (Figure 1). Each document was reviewed to identify operator commitments and COAs that were included in the decision records for each NEPA document to avoid, minimize, or mitigate impacts to sage-grouse and protect or conserve the species and its habitat during development and operations. A total of 103 NEPA documents for oil and natural gas documents within the current range of sage-grouse were reviewed (Appendix A). The NEPA documents included in this review were generally those finalized between 2008 and 2013 to demonstrate commitments under NEPA made by Operators. In addition to the 103 NEPA documents, numerous documents and reports demonstrating implementation and compliance with the COAs and Operator commitments were reviewed. Collectively, these documents describe the measures currently being implemented by oil and natural gas operators as required by BLM and USFS NEPA decisions.

**Table 1. ESA listing factors and threats for the greater sage-grouse.**

<b>Listing Factor - ESA Section 4(a)(1)</b>	<b>Threats</b>
Factor A: The Present or Threatened Destruction, Modification, or Curtailment of Habitat or Range	Habitat conversion for agriculture
	Urbanization
	Infrastructure in sagebrush habitats (powerlines, fences, roads, railroads, communication towers)
	Fire (wildfire, change in wildfire frequency)
	Invasive plants (annual grasses and other noxious weeds)
	Pinyon-juniper encroachment
	Grazing
	Energy development (nonrenewable and renewable)
	Climate change
Factor B: Overutilization for Commercial, Recreational, Scientific, or Educational Purposes	Commercial hunting
	Recreational hunting
	Recreational use (bird watching, lek visits, photography)
	Religious use
	Scientific and educational use
Factor C: Disease and Predation	Disease (West Nile virus)
	Predation
Factor D: Inadequacy of Existing Regulatory Mechanisms	Local land use laws, processes, and ordinances
	State laws and regulations
	Federal laws and regulations
	Canadian federal and provincial laws and regulations
	Non-regulatory conservation measures
Factor E: Other Natural or Manmade Factors Affecting the Species' Continued Existence	Pesticides
	Contaminants (e.g., oil in wastewater pits)
	Recreational activities
	Life history traits affecting population viability
	Drought

All NEPA documents and supporting information or reports were characterized, cataloged, and indexed in a relational database. Each COA or required conservation measure was characterized according to the threat and listing factor that it is meant to address as well as location in which the measure is or will be implemented. In some circumstances, these lease stipulations may be excepted, modified, or waived based on site-specific information and conditions. Nonetheless, BLM may only grant exceptions, modifications, and waivers where potential adverse effects are eliminated or notably reduced.

Each measure or group of similar measures was assessed using the USFWS Policy for Evaluation of Conservation Efforts When Making Listing Decisions (“PECE Policy”). The PECE Policy evaluates the certainty that each COA or conservation measure will be implemented (Certainty of Implementation) and the certainty that, when implemented, the COA or conservation measure will be effective (Certainty of Effectiveness).

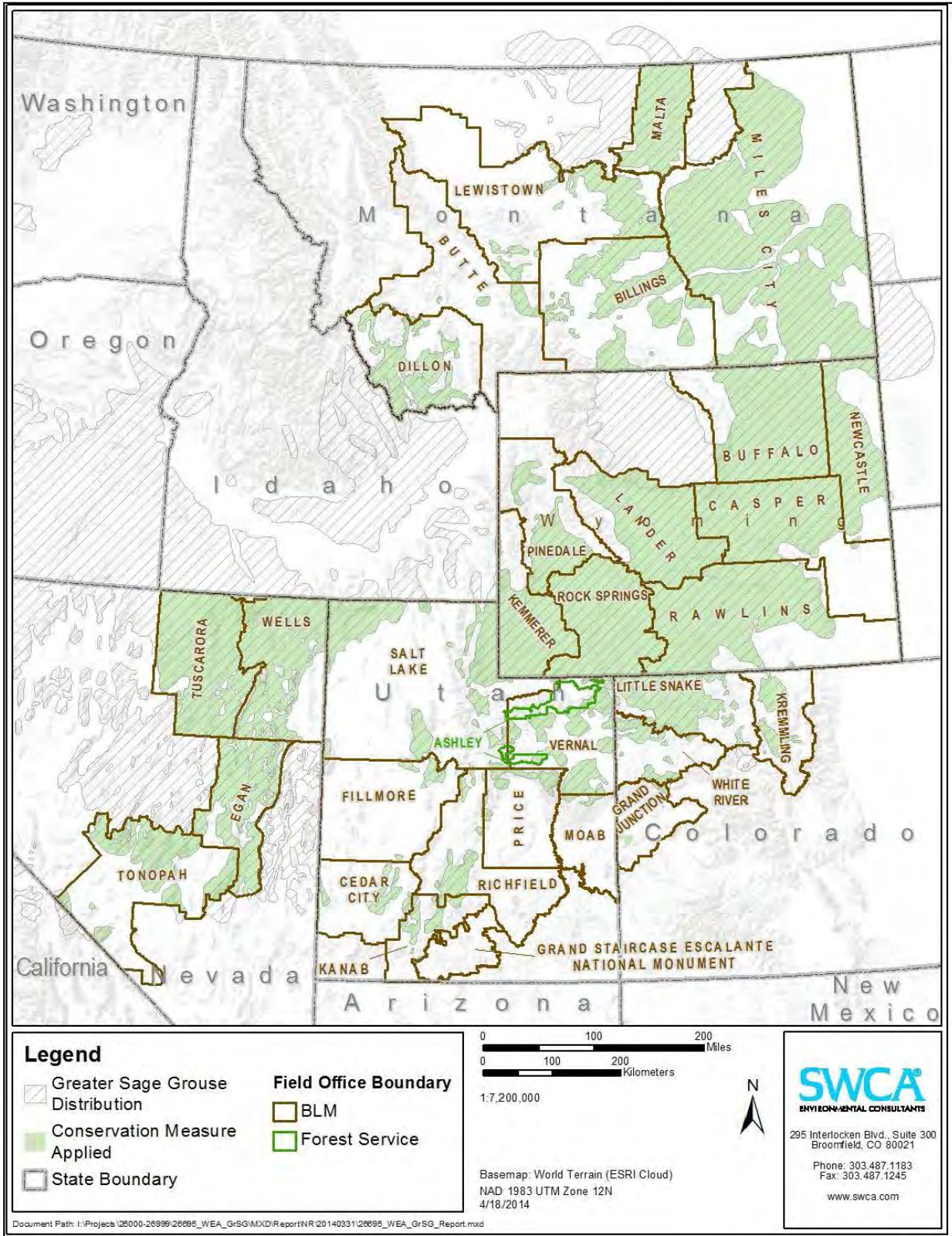


Figure 1. BLM Field Offices and National Forests Included in Review of Oil and Natural Gas NEPA Documents and RMPs.

## **SUMMARY OF NEPA REVIEW**

Many Operators within sage-grouse range have been making great efforts to reduce their projects' impacts on the environment, even prior to the NEPA process. They have designed their projects to reduce the footprint of their development, reduce traffic, and reduce human activity. These efforts are not always specific to sage-grouse, but rather aim to protect habitat at a landscape scale through decreased direct and indirect habitat loss and fragmentation. Protection at the landscape scale protects not only sage-grouse but also many other wildlife species and natural resources including big game, migratory birds, habitats, water quality, soils, etc. These measures are important in the conservation of sage-grouse, but are not always reflected in the COAs because they are already part of the plan of development or alternatives analyzed in NEPA documents.

In addition to implementation of best management practices, including the efforts described above, NEPA documents and decision records include additional Operator-committed conservation measures to protect wildlife, including sage-grouse, which will be implemented over the life of each project. These operator-committed measures and additional COAs become required elements of oil and natural gas development when they are contained in the decision records for BLM and USFS NEPA processes. When included in the decision records, these measures must be implemented to be in compliance with agency requirements.

To identify the COAs and conservation measures that are being implemented by oil and natural gas Operators and the federal land management agencies to conserve sage-grouse, NEPA documents and decision records related to development were reviewed from lands administered by BLM and USFS field offices across the range of greater sage-grouse. As a result of this review, 773 conservation measures were cataloged from 103 NEPA documents. Of the NEPA documents reviewed and summarized in this report, an average of 6.5 COAs or conservation measures that directly address threats to sage-grouse were required per decision record. These conservation measures were categorized into 14 general categories (Table 2).

Collectively, measures were implemented across 18 BLM Field Offices and National Forests responsible for managing 68,404 square miles of public land with occupied sage-grouse habitat representing 37 percent of the species' current occupied range and the majority of the species range in Wyoming, Colorado, Utah, Montana, and Nevada. No oil and natural gas related NEPA decisions were identified for the other BLM Field Offices and National Forests within the range of greater sage-grouse. This is primarily a result of lower levels of oil and natural gas activity in the states of Idaho, Oregon, and portions of Nevada. However, it is likely that similar measures discussed in this document would be implemented in those field offices if oil and natural gas activities were to occur in these areas in the future. These public lands plus the split-estate lands with federal minerals and private ownership represent the area in which BLM and USFS required COAs, conservation measures, and avoidance, minimization and mitigation measures would be reasonably certain to occur as a result of NEPA decisions made for past, ongoing, and future oil and natural gas activities.

**Table 2. Occurrence of conservation measures and COAs in NEPA documents.**

<b>COA/Conservation Measure Category</b>	<b>Number of Field Offices (%)</b>	<b>Number of NEPA Documents (%)</b>
Monitoring/adaptive management	15 (83%)	59 (57%)
Seasonal limitations and year-round development	18 (100%)	87 (84%)
Reclamation	18 (100%)	93 (90%)
Reduce surface disturbance/multi-well pads	13 (72%)	45 (44%)
Dust suppression	18 (100%)	59 (57%)
No surface occupancy	16 (89%)	35 (34%)
Noxious/invasive weed management	16 (89%)	51 (50%)
Reduce traffic	12 (67%)	30 (29%)
Reduce noise/visual impacts	11 (61%)	33 (32%)
Reduce perching predators	12 (67%)	27 (26%)
Produced water management	13 (72%)	27 (26%)
Timing limitation	13 (72%)	24 (23%)
Vegetation treatments	3 (17%)	3 (3%)
<b>Total</b>	<b>18</b>	<b>103</b>

The inventory of required COAs and conservation measures under NEPA, included cataloging all measures specific to sage-grouse and any measure or development practice that was not specific to sage-grouse but would reasonably be expected to benefit sage-grouse due to overlap with sage-grouse habitat or sage-grouse sensitive seasons. Voluntary initiatives (surface disturbance reductions, timing restrictions, conservation easement purchase, etc.) implemented by the operators were also evaluated where these measures became part of the agency’s NEPA decision record.

The majority of the NEPA documents that were reviewed implement the following standard measures:

- Adaptive management and monitoring of the effectiveness of measures or the response of sage-grouse to those measures.
- Seasonal, timing, and spatial restrictions of activities to protect leks, nesting habitat, brood-rearing habitat, and winter habitat.
- Interim and final reclamation with monitoring to restore natural habitat.
- Noxious weed monitoring and control.
- Dust suppression on roads and operations areas that reduces impacts on adjacent vegetation/wildlife habitat.
- Speed limits to reduce dust, noise, and wildlife collisions.
- NSO buffers to protect wetlands and riparian areas (important for sage-grouse brood rearing).



- Noise abatement requirements to reduce noise impacts on receptors including leks.

A description of each of the conservation measure categories and examples of COAs/conservation measures in the categories are described in the following sections. All 773 conservation measures are provided as they appeared in the NEPA decision records in Appendices B through O. Demonstration of each measure's compliance with the USFWS PECE process and maps showing federally administered lands where these measures are implemented are also provided in Appendices B through O. Collectively, these measures, when implemented, would result in the conservation and protection of sage-grouse populations or the avoidance and minimization of impacts to the species and its habitat and provide Certainty of Implementation and Certainty of Effectiveness under the PECE Policy.

## **SEASONAL LIMITATIONS**

Seasonal limitations are intended to limit new surface disturbance and disruptive activities (construction, drilling, completion, reclamation, and other activities potentially disruptive to sage-grouse) in certain areas during breeding, nesting and brood-rearing, and/or winter seasons. These measures were applied in 100% of all BLM Field Offices and National Forests for which NEPA documents were reviewed (Table 2 and Appendix B). These activities may directly or indirectly impact sage-grouse and their nests due to increase traffic, noise, human presence, and dust. High traffic volumes may influence female behavior, nest-initiation, and nest success (Manier et al. 2013:50; Lyon and Anderson 2003).

Seasonal limitations are intended to minimize the potential for disturbing breeding, egg-laying, incubating, wintering, and brooding sage-grouse. The area protected is based on the concept that females nest and rear broods near leks and therefore seasonal limitations typically apply to the area within 2 miles of leks. However, BLM and USFS seasonal limitations are often applied to all nesting habitats across a project area. The proximity, configuration, and abundance of nesting habitat are key factors influencing lek locations and therefore leks are indicative of nesting habitat (USFWS 2010:13915). After breeding, females typically nest within 4 miles of leks, with most nests located within 2 miles of leks (Schroeder et al. 1999:12). Based on studies in Wyoming, hens rear their broods within 0.1 to 3.1 miles of the nest site for the first 2 to 3 weeks following hatching (Connelly et al. 2004:4–8).

Unless habitat studies have been completed in order to map nesting/brood-rearing habitat within a project area, the nesting/brood-rearing habitat is often assumed to be the area within a 2-mile buffer around leks (i.e., 8,043 acres per lek). The nesting/brood-rearing season is typically defined as March 15 to July 15, although this varies by field office.

To protect wintering birds, seasonal limitations on disruptive activities may be applied to winter concentration areas. These limitations typically apply from November 15 through March 14, although this may vary slightly. Winter seasonal limitations for other species (i.e., big game) may also benefit wintering sage-grouse where habitats overlap. Examples of commonly implemented seasonal limitations include the following.

- “Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1 to July 15 for the protection of strutting and

nesting sage-grouse.” (Double Eagle Petroleum, Catalina Plans of Development [PODs] C and D in the Atlantic Rim)

- “No surface-disturbing activities shall occur within sage-grouse nesting habitat, from 15 March through 30 June, annually.” (Devon Energy Company, L.P., Grayling POD EA)
- “A 3-mile buffer zone would be established around known leks, and construction activity in this buffer zone would be restricted between March 15 and July 15 to minimize effects to breeding, egg-laying, incubating, and brooding sage-grouse.” (EnCana, Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project EA)
- “No surface disturbing activities are permitted within 2 miles of sage grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities” (Anadarko Petroleum Corporation, Dry Willow III POD EA)

BLM frequently requires operators to develop projects with seasonal stipulations which prohibit drilling and associated activities during winter, typically December to May, for various species. Seasonal stipulations, however, have significant consequences for operators because they limit the time available for construction, drilling, and reclamation, and double the number of rig moves and truck hauling. As a consequence, seasonal stipulations can extend development over multiple years, prolonging impacts to species. In contrast, year-round drilling in combination with multiple-well pads significantly benefits wildlife by reducing the duration of drilling and well pad density. Utilizing year-round drilling and multiple-well pads, Operators can plan phased development that confines activities to limited areas; reduce pad density and associated roads; reduce overall drilling duration; and promote efficient project execution. This leaves large areas of habitat undisturbed, which facilitates timely interim reclamation and allows sage-grouse and other wildlife species to better acclimate and avoid development activities.

The review of NEPA documents recorded five documents with five measures that discuss year-round drilling as a means to reduce the duration of a project (Appendix B). The following is an example of such measures.

- “Year round drilling would reduce drilling duration to 4-7 years compared to 21 years if no winter drilling from 11/1 to 5/15.” (BBC, EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)

## **RECLAMATION**

Reclamation is required in all BLM Field Offices and National Forests. There are two phases of reclamation: interim and final reclamation. Interim reclamation occurs when disturbed areas such as construction, storage, and temporary work areas, and portions of well pads are no longer needed during the production phase. These areas are recontoured as much as possible to natural topography, have topsoil redistributed, and are revegetated with native and/or BLM recommended seed mixtures. Interim reclamation partially restores habitat function by stabilizing soils, reducing erosion, and facilitating vegetative regrowth during

the production phase. Final reclamation involves recontouring, replacement and stabilization of topsoil, and revegetation of remaining disturbed areas upon abandonment. After wells are closed, the pads, roads, facility sites and other disturbed areas undergo final reclamation according to the specified methods and seed mixture. Successful reclamation may offset the negative effects of direct habitat disturbance from energy development (USFWS 2010:13948).

Reclamation ensures surface and subsurface stability and growth of a sustainable, naturally functioning permanent vegetation and habitat. NEPA documents typically describe goals for reclamation that include diverse, native vegetation similar in composition to adjoining vegetation (typically a minimum cover and composition of 80% of the desired plant community). Some NEPA documents specify using sagebrush seed in sage-grouse areas. COAs include annual monitoring and reporting to ensure successful reclamation. In some large developments, disturbance caps are used to encourage successful reclamation. With the exception of some seismic exploration projects, all oil and natural gas projects are required to reclaim areas of surface disturbance. A total of 93 documents with 112 measures related to reclamation were reviewed (Appendix C). Examples of such measures include the following.

- “Utilize native plant species for reclamation purposes (preferably local seeds and species that are preferred by sage grouse).” (Elk Petroleum, EA for the Grieve Unit CO2 Enhanced Recovery Project)
- “Sage-grouse oriented reclamation (e.g., specialized seed mix, lengthened cut and fill slopes) is expected to involve all pipeline acreage and about  $\frac{3}{4}$  of pad acreage (about 18 acres). Depending on subsequent ungulate use, this reclaimed acreage would serve increasingly effective brood and summer habitat function prior to the redevelopment of a suitable sagebrush canopy (10-15 years).” (EnCana Oil and Gas, 28 Applications for Permit to Drill [APDs] on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA)
- “Reclamation will be considered successful if the following Interim Reclamation criteria are met... 80 percent of predisturbance ground cover, 90 percent dominant species, No noxious weeds present in the seeding, and Erosion features equal to or less than surrounding area. The vegetation will consist of species included in the seed mix, and/or occurring in the surrounding natural vegetation or as deemed desirable by the BLM in review and approval of the reclamation plan. The goal is no single species will account for more than 30 percent total vegetative composition. Vegetation canopy cover production and species diversity shall approximate the surrounding undisturbed area.” (ROD and EIS for the Atlantic Rim Natural Gas Field Development Project)
- “Within 2 miles of an active greater sage-grouse lek, interim reclamation seed mixes will be designed to provide habitat for greater sage-grouse.” (Kerr-McGee Oil & Gas Onshore LP [KMG], Greater Natural Buttes EIS)
- “Operators will be allowed no more than 250 acres of surface disturbance per-year, no more than 1,250 acres of new surface disturbance at any given time, and no more than 1,500 acres of cumulative surface disturbance (i.e., new surface disturbance added to past and present surface disturbance associated with oil and gas development.” (BBC,

EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)

## **REDUCE SURFACE DISTURBANCE / MULTI-WELL PADS**

Habitat loss from energy development was identified as a threat in the USFWS 12-month finding for greater sage-grouse. Efforts to reduce the surface disturbance and fragmentation from oil and natural gas projects decrease this threat. As part of best management practices and voluntary measures, Operators conserve key habitats for sage-grouse during project planning through use of existing disturbance (i.e., add new well(s) on existing pads), use of clustered development and facility planning (co-location of facilities), and multi-well pads.

The density and distribution of oil and natural gas infrastructure may also affect sage-grouse. Male sage-grouse lek attendance has been shown to decrease in natural gas fields with a density of five or more wells within approximately 2 miles of leks, and sage-grouse are less likely to occupy areas with wells at 80-acre spacing compared to 988-acre spacing (USFWS 2010). Well location and density is determined in large part by geology and reservoir conditions. In addition, on BLM-administered lands, locations are often based on the spacing decision of individual state oil and natural gas boards. Wyoming has developed the density disturbance calculation tool (DDCT) to limit development in core sage-grouse habitats and other states have followed this model (e.g., South Unit EIS in Utah).

Multi-well pads, clustered development, and facility planning dramatically reduce the direct and indirect impacts from increased infrastructure, noise, traffic, and human activity related to oil and natural gas development. Traditionally, one vertical well was drilled on individual well pads. However, with recent advances in technology (i.e., horizontal drilling, directional drilling, and multi-well pads), it is now common for Operators to locate multiple wells on a single pad. Multi-well pads are beneficial in many ways, including reduction of disturbance to sage-grouse from habitat destruction, fragmentation, and traffic. Surface disturbance is greatly reduced by eliminating additional well pads and associated access roads. Consolidating operations to one pad also reduces surface disturbance associated with storage tanks and liquid separators on pads. Traffic associated with moving drill rigs from one well to the next is greatly reduced when wells are only 12 to 30 feet apart. Decreased time and traffic involved with rig setup, breakdown, and movement minimizes the environmental impact of drill rigs. Truck traffic to service multiple wells is also reduced since they need to visit fewer pads.

As an example, traditional oil and natural gas developments such of those evaluated in the USFWS 12-month finding on sage-grouse require 16 wells at 40 acre spacing to effectively recover oil and natural gas resources. Assuming that each single well pad averages 8 acres, the total surface disturbance in a 640 acre section would be 128 acres (20 percent of the surface area). This estimate does not include individual roads and pipeline right-of-ways (ROWs) for each well which would further increase surface disturbance, habitat fragmentation, and operational disturbances associated with well visits. Through colocation efforts, if these 16 wells were drilled from one 12-acre pad (less than 2 percent of the surface area of a section), then a minimum of 116 acres of disturbance would be eliminated. If drilled from two 12-acre pads the surface disturbance is reduced by 104 acres. The actual decrease in

surface disturbance would be greater than the 116 or 104 acres because only a single road and pipeline ROW is necessary for each multi-well pad. In both cases, the total disturbance per section would generally be less than 5%. In addition to surface disturbance reductions, this measure dramatically reduces habitat fragmentation, traffic, and other related disturbances.

Results of the NEPA review showed that the agencies and Operators made efforts to reduce surface disturbance of projects during the planning and NEPA process. Surface reduction measures were implemented in 72% of all BLM Field Offices and National Forests reviewed. These measures are also becoming more common with technological improvements and it is likely that more than 72% of Field Offices are currently implementing these measures. Ways to reduce overall surface disturbance from the project (in all habitats) and minimize fragmentation of sage-grouse habitat included collocating facilities, using existing disturbance, minimizing the size of well pads, and limiting the density of development. Some projects conserve habitat by locating project-related disturbance outside of sagebrush habitat. Disturbance caps were included in some COAs in order to incentivize decreased disturbance and increased reclamation.

A total of 45 documents were reviewed with 77 measures to reduce surface disturbance and conserve sage-grouse habitat, including 33 measures intended to reduce surface impacts by using multi-well pads, horizontal drilling, and directional drilling; and 14 measures intended to limit density of oil and natural gas development (Appendix D). Limitations for density varied from one to eight well pads per section and 5% to 6.25% disturbance per section. Examples of such measures include the following.

- “The proposal includes drilling 16 additional wells on the existing P28 496 well pad (for a total of 32 wells). No additional acreage is required to expand the existing well pad.” (EnCana Oil and Gas, 16 APDs on existing well pad P28-496)
- “28 wells on one new well pad. The well pad is proposed to have working surface dimensions of 778 feet long by 302 feet wide for total well pad surface disturbance of 9.7 acres. Following interim reclamation 2.2 acres will be needed for production.” (EnCana Oil and Gas, 28 APDs on new well pad D36 496)
- “The operator's development designs for multi-well pads and centralized production facilities were undertaken specifically as a means to reduce habitat loss and the scope of behavioral impacts imposed on sage-grouse.” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L27 796 and SG F22 496)
- “Operators would utilize directional drilling to access resources beneath the 0.25-mile active greater sage-grouse lek buffers if reserves beneath these locations are deemed economic. Operators would utilize directional drilling to access resources beneath the 600-foot wide (or tall sagebrush-dominated) buffer associated with the Sand Draw protection areas if deemed economic.” (ROD for the Jonah Infill Drilling Project EIS)
- “Production facilities will be consolidated when possible, to reduce disturbance from traffic, habitat fragmentation, and total surface area impacts.” (ROD, South Unit Oil and Gas Development Final EIS)

- “Identify non-greater sage-grouse habitat, or the lowest quality greater sage-grouse habitat, to determine a surface development pattern that may be least impacting to greater sage-grouse and may allow a viable population of greater sage-grouse to continue to persist in the East Bench area until total reclamation has been achieved.” (KMG, Greater Natural Buttes EIS)
- “Well pad surface density will be no more than one pad per approximately 160 acres.” (Gasco Energy Inc., Uinta Basin Natural Gas Development Project, EIS)
- “In development area MA-5 a maximum of two well pads per section will be allowed. A maximum of 40 acres of surface disturbance per section will be allowed (6.25% disturbance).” (ROD and Final Supplemental EIS for the Pinedale Anticline Oil and Gas Exploration and Development Project)

## **DUST SUPPRESSION**

Dust from unpaved road traffic accumulates on vegetation and may decrease the value of plants used by sage-grouse. Access roads and other exposed soils in oil and natural gas developments increase the amount of fugitive dust that spreads and lands on vegetation. Increased dust on vegetation could reduce the health and quality of habitat as well as decrease the forage potential for sage-grouse.

The 12-month finding describes how fugitive dust from road use and wind erosion may impact sage-grouse habitats. Heavy equipment operations and truck traffic on unpaved roads and other exposed areas produce dust that may interfere with plant photosynthesis and impact insect populations (USFWS 2010:13949). Indirect impacts to sage-grouse also include reduced air quality and changes in vegetation.

Dust suppression is commonly used in the industry due to air quality standards, but controlling dust is also recognized for the benefits to sage-grouse and its habitat. Dust abatement techniques discussed in the NEPA documents include application of water or chemical suppressant to roadways, enforcing speed limits, and seeding of all disturbed areas that are not used during the well production phase (e.g., borrow ditches and topsoil and spoil piles). The NEPA review found 59 documents with 59 measures intended to reduce impacts of fugitive dust (Appendix E). Examples of such measures include the following.

- “The operator shall implement dust abatement measures as needed to prevent fugitive dust from vehicular traffic, equipment operations, or wind events.” (EA of the Orchard Master Development Plan for Oil and Gas Development)
- “Operators on federal leases will be required to post and enforce speed limits to reduce fugitive dust emissions. Dust inhibitors will be used as necessary on unpaved collector, local and resource roads to reduce fugitive dust emissions to the air and resources adjacent to the road.” (ROD for the Final Statewide Oil and Gas EIS and Proposed Amendment of the Powder River and Billings RMPs)

- “Emissions of particulate matter from well pad, road, and other facility construction, operation, and reclamation activities will be minimized by application of water or other dust suppressants.” (Samson, Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming, EA)

## **NO SURFACE OCCUPANCY (YEAR-ROUND)**

In addition to seasonal and timing limitations, development is often precluded within buffers around sage-grouse leks year-round. Well pads, roads, and other structures must be located outside of these NSO buffers in order to protect leks that sage-grouse return to each breeding season. Hens move their broods to areas of more succulent vegetation in late summer and fall. Therefore, NSO/CSU buffers that are implemented near surface water and riparian areas to protect water quality and aquatic habitats also protect sage-grouse brood-rearing habitat within these buffers.

Based on the results of the NEPA review, the NSO restriction was typically applied to a 0.25- to 0.60-mile radius around occupied leks, regardless of season. Only projects with leks within the project boundary or immediate area would have the need for applying this NSO restriction. The NSO restriction for riparian areas and surface waters, which helps conserve brood-rearing habitat, was typically 100 to 500 feet.

Thirty-five documents with 53 instances of NSO/CSU restrictions around leks (41 NSO/CSU restrictions) and riparian areas and surface waters (12 NSO/CSU restrictions) were recorded (Appendix F). Examples of such measures include the following.

- “Numerous well pads, roads, and corridors were relocated so that all were located outside the established 0.25 mile Controlled Surface Use (CSU) area for the lek.” (Doty Mountain POD C in Atlantic Rim EA)
- “Surface occupancy and/or disruptive activities are prohibited on or within a six tenths (0.6) mile radius of the perimeter of occupied sage-grouse leks.” (Elk Petroleum, EA for the Grieve Unit CO2 Enhanced Recovery Project)
- “To reduce potential disturbance to strutting birds (and the likelihood of lek abandonment), nesting birds, and habitat, no well pads or permanent structures will be allowed within 0.6 mile of an occupied lek. This measure would distance structures away from leks that raptors may use for perching.” (ROD for South Unit Oil and Gas Development Final EIS)
- “Avoid activities within identified 100-year flood plain, within 500 feet of perennial waters, springs, wells, and wetlands, and areas within 100 feet of the inner gorge of ephemeral channels...” (Samson, Endurance/Barricade Gas Infrastructure Project)

## **NOXIOUS/INVASIVE WEED MANAGEMENT**

Noxious weeds and other invasive plants have altered vegetation communities and caused declines in native plant diversity and populations throughout much of the western U.S.

Noxious weeds are a threat to sage-grouse because they reduce the abundance of plants that sage-grouse use for food and cover. Noxious and invasive weeds may increase fragmentation in existing sage-grouse habitat and increase the potential for wildfires resulting in loss of sage-grouse habitat. Surface disturbance from oil and natural gas development may facilitate the spread of noxious and invasive weeds unless managed properly.

The NEPA documents reviewed included measures to prevent the introduction and reduce the spread of noxious and invasive weeds. Many projects develop Weed Management Plans that include pre-construction surveys and post-construction monitoring and control. Review of NEPA documents recorded 51 documents with 52 measures related to controlling the introduction and spread of weeds (Appendix G). Examples of such measures include the following

- “The operator has prepared a Weed Management Plan... Weeds would be controlled on all disturbed areas during the life of the project.” (Elk Petroleum, EA for the Grieve Unit CO2 Enhanced Recovery Project)
- “Invasive species/noxious weed monitoring forms would be completed and submitted to the BLM. A weed control plan would be prepared and implemented based on BLM’s approval.” (EnCana, Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project EA)
- “All weed control programs in sage-grouse habitat will use integrated weed management techniques to reduce the area of treatment and minimize adverse side effects.” (Exxon, Piceance Development Project, Finding of No Significant Impact and DR)
- “Inventories for the presence of noxious weeds shall be conducted at least once early in the growing season for all areas disturbed by oil and gas exploration and development. Weeds shall be treated in an appropriate manner if found during inventories. Follow-up inventories and re-treatment during the same growing season may be necessary to provide additional control and/or eradication.” (EnCana, Story Gulch APDs [32] for 16 additional wells on F25 pad & B36 pad each)

## **REDUCE TRAFFIC**

This category includes transportation planning and other ways to reduce the number of roads and volume of traffic in sage-grouse habitat through project planning by operators, use of pad drilling, use of remote well monitoring, liquid gathering pipelines, and other means. The 12-month finding discusses the negative effects of roads and traffic on sage-grouse under Factor A. Some literature suggests that sage-grouse tend to avoid roads because of the associated noise, visual disturbance, human activity, and predators that move along roads (USFWS 2010). Male sage-grouse lek attendance may decline near haul roads with traffic volumes that exceeded one vehicle per day and daily traffic along oil and natural gas roads may cause lek abandonment. However, as discussed in Ramey (2013), these studies were located in heavily developed fields where more invasive technologies were used and do not reflect the conditions of advanced reclamation, methods to limit surface disturbance, and other protective



measures that are now mainstream in development that takes place in sage-grouse habitat. Ramey also points out that traffic effects to lek attendance are typically temporary and do not translate into a population decline.

Review of available NEPA documents found various measures that would reduce impacts to sage-grouse due to traffic. Some measures specifically address sage-grouse and others are general wildlife measures that also benefit grouse. For example, enforcing speed limits in order to reduce wildlife collisions benefits grouse by reducing direct wildlife-vehicle collisions which in turn decrease the number of predators attracted to the area due to available road kill. Other measures include minimizing traffic seasonally through measures such as carpooling. Road projects are designed to avoid habitat, using existing routes that are not within high-quality habitat or near occupied sites. Gathering system pipelines and remote monitoring are used to reduce truck traffic to well sites. For example, the Pinedale Anticline EIS estimated that the required liquids gathering system would eliminate approximately 165,000 truck trips annually during peak production. A total of 30 documents were identified with 48 measures to reduce traffic-related impacts in sage-grouse habitats (Appendix H). Examples of such measures include the following.

- “Reasonable efforts would be made to organize transportation and access routes that minimize traffic volumes and avoid suitable sagebrush habitats to the greatest extent practicable.” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L796 and SG F22 496, EA and Decision Record [DR])
- “Roads within 1/2 mile of sage grouse leks will be posted (with signs shorter than four feet) by the operator at 10 mph during daylight hours between March 1-June 15.” (Yates Petroleum Corporation, Gauge POD EA)
- “The applicant chose access routes that minimize traverse lengths through higher quality or more consistently occupied habitats.” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L796 and SG F22 496, EA and DR)
- “Resource protection/mitigation design features associated with this project include using telemetry and remote monitoring equipment and techniques that reduce the number of physical visits to each well pad.” (EOG Resources, Inc., Ballista Flatbow Multi-Well Pad Project EA)

## **REDUCE NOISE AND VISUAL IMPACTS**

Oil and natural gas development increases noise within sage-grouse habitat. As discussed in the 12-month finding (USFWS 2010:13947) if the noise reaches high enough levels in occupied habitat, sage-grouse may be affected due to increased stress and disruption of mating display. In the absence of stipulations to minimize the effects of noise, mechanical activities at well sites and traffic on access roads may disrupt sage-grouse breeding and nesting activities and lead to decreased lek attendance (Aldridge and Brigham 2003:32). By using noise-control mufflers and strategically locating noise sources, such as compressors, Operators could significantly reduce noise levels in sage-grouse habitat. Visual disturbances, such as lighting, may also disturb sage-grouse and can be mitigated to reduce these impacts.

Oil and natural gas operators consider noise levels when siting compressor stations and other facilities and use the best available technology to reduce noise near leks. The goal is to reduce decibels to levels slightly higher than local background noise. In the NEPA documents reviewed for this project, the typical goal was to not exceed 49 decibels. Technology used to reduce noise levels include multi-cylinder pumps, high-efficiency mufflers, and exhaust systems. Topographic features can be used to shield leks from noise and visual impacts. Intense lighting could be minimized using shields and area-directing fixtures. These measures are typically applied in areas within 0.5 to 2.0 miles of leks; one EIS required noise mufflers within 3.1 miles of leks.

A total of 33 documents were identified with 41 measures intended to reduce impacts to sage-grouse due to noise or visual impacts (Appendix I). Examples of such measures include the following.

- “The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.” (Anadarko Petroleum Corporation, Dry Willow III POD EA)
- “The applicant will make efforts to muffle and redirect noise emanating from on-site compression facilities (if used) in a manner that would substantially reduce noise-reception from occupied sage-grouse habitats on adjacent ridgelines (for example, using heavy side-slope vegetation and distance to attenuate noise and considering prevailing winds to align residual transmission down-canyon for F22, downwards NNE into canyon for E34/L27).” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L27 796 and SG F22 496)
- “To reduce noise levels down to an acceptable level so as not to disturb strutting birds or cause lek abandonment, all wells within 3.1 miles of a lek will be muffled with the latest technology to reduce noise levels from wells down to no more than 45dB at a lek. All wells within 3.1 miles of a lek will have mufflers oriented away from leks.” (ROD South Unit Oil and Gas Development Final EIS)
- “The applicant will use the lowest intensity lights that safety requirements will allow and make efforts to shield fixtures to reduce the intensity of light visible from adjacent ridgeline habitats.” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L27 796 and SG F22 496)

## **REDUCE PERCHING PREDATORS**

Tall structures such as powerlines, tanks, and tank batteries, and other high-profile facilities may provide perches for raptors or ravens that prey on sage-grouse. The increased abundance of raptors and corvids within sage-grouse habitats may result in increased predation, which is a threat discussed in the 12-month finding (USFWS 2010) (see Table 1). Buried powerlines, restricting high-profile facilities, and the use of perch deterrents may reduce the threat of increased predation on sage-grouse due to perching predators. Additionally, reduction of

surface disturbance as described earlier in this document also reduces perching, scavenging, and foraging opportunities for potential predators.

As detailed in the 12-month finding, raptors and corvids are attracted to power poles and other tall structures where natural perches are limited, including areas occupied by sage-grouse. The 12-month finding states that while sage-grouse are prey for numerous species, and that nest predation by ravens and other human-subsidized predators may be increasing and of potential concern in areas of human development, no information indicates that predation is having or is expected to have an overall adverse effect on the species (USFWS 2010:13987). Oil and natural gas developers can use various measures to prevent an increase in human-subsidized predators in sage-grouse habitat.

In oil and natural gas developments, new powerlines are either buried or fitted with raptor anti-perching devices. Tanks or other high-profile structures are often located outside of active sage-grouse habitat; squat tanks (low profile) are used near leks. The NEPA documents reviewed typically apply these measures within 0.25 to 2.00 miles of an occupied sage-grouse lek. Review of NEPA documents identified 27 documents with 40 measures intended to reduce predation due to perching predators (Appendix J). Examples of such measures include the following.

- “No powerlines or electrical transmission lines will be constructed that would provide perch sites for raptors within 2 miles of sage grouse habitat” (QEP, Greater Deadman Bench Oil and Gas Producing Region EIS and ROD)
- “Raptor deterrent perches would be used on powerlines structures within 0.5 miles of active sage-grouse leks to minimize raptors perching in the immediate area of the lek and reduce the potential for increased raptor predation during the sage-grouse breeding season.” (Encana, Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project EA)
- “Construction of structures that could be used for raptor perches would be avoided or designed to prevent raptor perching.” (Luman Rim Natural Gas Development EA and DR)
- “Tanks for wells within 2 miles of an active greater sage-grouse lek will be located out of line-of-sight of the lek, or will be squat tanks.” (KMG, Greater Natural Buttes EIS)

## **PRODUCED WATER MANAGEMENT**

Produced water from drilling and operations may be stored in reserve pits or tanks on-site, or trucked or piped off site to injection wells/storage ponds. Produced water management is an important tool for oil and natural gas producers to control mosquitos and to prevent sage-grouse contamination or drowning. As discussed in the 12-month finding, if the wastewater pits are not appropriately screened, sage-grouse may have access to them and could ingest water and/or become oiled while pursuing insects. Wastewater pits also provide potential breeding habitat for mosquitoes that could transmit WNV. The management of produced water addresses the threats of disease (WNV) and contamination (Factors C and E, Table 1).

The NEPA review found 27 documents with 33 measures that would reduce the impacts of water storage (Appendix K). The measures fell into three main categories: closed-loop drilling, screening pits, and mosquito control. Examples of such measures include the following.

- “Closed-loop drilling will be used in sensitive areas such as locations proposed within or near 100-year floodplains or drainages, cultural resources or archaeological sites, and within important wildlife habitats.” (BBC, EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)
- “Use closed loop drilling to eliminate the need for reserve pits, reduce closure and waste management costs, and reduce potential for contamination from leaking.” (ROD, South Unit Oil and Gas Development Final EIS)
- “It will be the responsibility of the operator to effectively preclude migratory bird access to, or contact with, reserve pit contents that possess detrimental properties.” (Exxon, Piceance Development Project)
- “Reserve pits shall be fenced to prevent sage-grouse entry and potential mortality.” (Luman Rim Natural Gas Development EA)
- “When water quality may allow the propagation of mosquitoes, then fresh water storage pits would be treated with biological mosquito controls (from June through September).” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L796 and SG F22 496, EA)
- “Manage produced water to reduce the spread of West Nile virus within sage-grouse habitat areas. Implement the following impoundment construction techniques and measures to eliminate water sources that support breeding mosquitoes...” (Fidelity Exploration & Production Company, Bowdoin Natural Gas Development Project).

## **TIMING LIMITATIONS**

Sage-grouse use audio and visual display behaviors to attract and select mates, and depend on audio communication between females and nestlings during brood rearing. As discussed in the 12-month finding, noise associated with human activity, such as noise from oil and natural gas development and production, may disrupt these behaviors or reduce lek attendance. Sage-grouse typically congregate at leks during dusk to sunset and dawn to sunrise. Increased traffic volumes on roads near leks may cause lek attendance to decrease. Vehicle activity during the early morning strutting period may decrease male lek attendance compared to roads with no vehicle activity during early morning. To prevent the disturbance of breeding sage-grouse and potential lek abandonment during the breeding season, timing limitations are used to restrict traffic and other activities during the evening and early morning hours.

Within the NEPA documents, typical timing limitations are from 5:00 p.m. to 9:00 a.m. during the breeding season (March 1–May 31), although specific times and the definition of breeding season varied. This stipulation is commonly applied to the area within 0.25 mile of occupied leks. However, some NEPA documents expand the timing limitation to 0.6 mile

around leks, within “occupied sage-grouse habitat,” within “sage-grouse habitat,” or “within 0.6 mile of sage-grouse habitat.” Timing limitations specifically protect sage-grouse during strutting on identified leks. Only projects with leks within the project boundary or immediate area would have the need for applying timing restrictions.

The NEPA review recorded 24 documents with 27 measures to reduce impacts to lekking grounds by establishing timing limitations (Appendix L). Examples of such measures include the following.

- “Disruptive activity is restricted on or within six tenths (0.6) mile radius of the perimeter of occupied sage-grouse leks from 6 pm to 8 am from March 1 to May 15.” (Elk Petroleum, EA for the Grieve Unit CO2 Enhanced Recovery Project)
- “A 0.6 mile radius “No Disturbance” buffer would be applied around active lek sites (documented activity within the last 5 years) from 5:00 a.m. to 9:00 a.m., March 15th through May 15th.” (EnCana Oil and Gas, Master Development Plan for the SG E34 496, SG L796 and SG F22 496, EA)
- “Disruptive activity is restricted on or within one quarter (0.25) mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6 pm to 8 am from March 15-May 15.” (Lance Oil & Gas Company, Inc., Bear Draw Gamma EA)
- “In order to prevent disturbing breeding greater sage-grouse during their breeding season, no nonemergency traffic should use JCR 23A road between 6pm and 9am during the peak lek attendance, March 1 to May 30.” (Wellstar, EA for APDs Bush Draw Federal 18-1 and 3-2 in Jackson County)

## **VEGETATION TREATMENTS**

Vegetation treatments can be used to enhance sage-grouse habitat including sagebrush and wet meadow areas, such as when pinyon-juniper woodlands encroach upon sagebrush habitat. As discussed in the 12-month finding under Listing Factor A, pinyon-juniper encroachment may reduce or eliminate sage-grouse occupancy in these areas (USFWS 2010). Pinyon-juniper removal has been shown to increase the use of sagebrush habitat by Gunnison sage-grouse, and the same is assumed for sage-grouse. Also, fire in sage-brush habitats would impact sage-grouse by reducing available habitat. Operators can implement measures to prevent fires during project activities.

The NEPA review recorded one document with two measures for off-site vegetation treatments to improve sage-grouse habitat and two documents with two measures intended to reduce impacts of fire (Appendix M). These treatments are site-specific and project-specific and are not expected to be prevalent across all NEPA documents or Field Offices, however, where monitoring and mitigation plans are required in RODs (see next section) habitat treatments benefitting sage-grouse are often applied. Measures include the following.

- “Habitat improvement and connectivity projects designed to remove encroaching pinyon and juniper (e.g., lop and scatter) and increase the sagebrush park size to

benefit sage grouse.” (BBC, EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)

- “Wet meadow/summer range enhancement projects designed to increase this type of habitat for sage-grouse brood survival. Up to six projects will be implemented. Acres enhanced will be counted under the habitat improvement tally at an equal or greater acreage value based on the qualitative benefits of the enhancement.” (BBC, EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)
- “Due to the sensitive nature of the sagebrush habitat in the project area and the past history of fire impacts to grazing and sage-grouse, Noble would prepare and implement a Fire Prevention Plan.” (Noble, EA Huntington Valley 3D Seismic Project; and Noble, Marys River 3D Seismic Project)

## **MONITORING, MITIGATION, AND ADAPTIVE MANAGEMENT**

This category includes pre- and post-construction wildlife mitigation plans, sage-grouse surveys, planning/funding monitoring and mitigation projects, and adaptive management. Some state wildlife agencies encourage the use of wildlife mitigation plans to facilitate long-term mitigation strategies for species including sage-grouse. Wildlife mitigation plans identify particular development areas and the mitigation measures to be used, and may include BMPs and other measures such as wildlife surveys and habitat improvement projects. Monitoring is necessary to show long-term population trends (i.e., annual lek counts) and to quantify the effects of various threats such as vehicle collisions and WNV. Monitoring also determines the effectiveness of conservation measures such as reclamation and invasive species control. Adaptive management allows adjustments to a mitigation approach once information from monitoring shows improvements are necessary. Adaptive management has also led to improvements in future project planning.

Some possibility exists that a required COA or conservation measure could be excepted, waived, or modified by the BLM or Forest Service. Occasionally, the BLM may grant an exception, waiver, or modification of a COA. However, this can occur only if the authorized officer determines that the factors requiring the COA have changed sufficiently to make the protection provided by the stipulation no longer justified or if the proposed operations would not cause unacceptable impacts (BLM IM 2008-032). Additionally, exceptions, waivers, or modification may be granted if additional mitigation is applied to remove or reduce impacts such that the required COA or conservation measure is no longer needed. Exceptions, waivers, and modifications provide a viable and effective means of applying Adaptive Management techniques to oil and natural gas activities to meet changing circumstances. These decisions are made during the adaptive management process and are informed by monitoring and mitigation efforts that are implemented by the agencies and Operators. Exceptions do not get rid of requirements; rather they increase the level of documentation and protection needed to enable the exception of the requirement.

A total of 59 NEPA documents with 113 monitoring and adaptive management measures were recorded (Appendix N). All field offices identified some type of adaptive management,

monitoring, or mitigation that would benefit sage-grouse. Types of monitoring included annual lek surveys, pre-construction clearance surveys, aerial and ground surveys, winter use surveys, and assisting state agencies with monitoring. In addition to those items identified in NEPA documents, multiple examples of voluntary, proactive monitoring and mitigation strategies have been developed by the Operators to benefit sage-grouse and other species. These documents are included in NEPA documents as operator committed measures or, in the cases of the plans with a Memorandum of Understanding (MOU) or other signed agreements, are included as required elements of all NEPA alternatives and decision records. Examples of these include:

- Noble Energy's Greater Sage-grouse Mitigation Plan and MOU for Mary's River Exploration Project, Elko County, Nevada. Noble Energy developed the Mary's River mitigation plan in compliance with WO IM No. 2012-043 to reduce the level of impacts on sage-grouse to an insignificant level through the implementation of Design Features, BMP's, and Mitigation Measures. In addition, compensation for impacts would be sought for temporary, long term and permanent impacts. Noble would agree to a maximum of \$600 per disturbed acre at 3:1 ratio for PPH/ Category 1 & 2 and 2:1 ratio for PGH/Category 3 for mitigation off-sets to be put in an Impact Compensation Fund (escrow or similar account) for later use on offsite sage grouse habitat mitigation projects. Types of projects that would be considered include but are not limited to: Habitat enhancement projects; Invasive species treatments (as offsite mitigation only, onsite treatments would remain the responsibility of Noble); Sagebrush plantings; Conservation easements; Restoring or preserving habitat connectivity; Sage Grouse Research (maximum of 10% total funds)
- Exxon/XTO Piceance Basin Wildlife Mitigation Plan. In 2010, XTO and Colorado Parks and Wildlife signed a Wildlife Management Plan regarding future development plans on 150,000 acres in the Piceance Basin, potential mitigations to reduce environmental impacts to wildlife, and strategies to obtain approval of year-round and continuous activities. A Wildlife Management Plan is one method approved by the Colorado Oil and Gas Conservation Commission to facilitate APD approvals by avoiding the need for individual well or well pad consultations with CPW for development in sensitive wildlife areas, including for sage-grouse. The Plan requires annual meetings between XTO and Colorado Parks and Wildlife to review the effectiveness of applied mitigation measures, revise these measures as necessary to ensure their efficiency, consistent with the principles of adaptive management, and provide an updated three-year development plan.

### **Monitoring Efforts Required Under NEPA**

- “The Operators will establish a fund for compensatory mitigation as part of their operation. This fund will be administered by the Jonah Interagency Monitoring and Mitigation Office (JIO) established by this ROD (see Appendix C). The JIO will evaluate monitoring and mitigation effectiveness and provide annual adaptive management recommendations as appropriate to the BLM for consideration. WGFD and the Governor of Wyoming have coordinated on these strategies.” (Record of Decision [ROD] for the Jonah Infill Drilling Project EIS)

- “Establish a Pinedale Anticline Project Office to obtain, collect, store, and distribute monitoring information to support adaptive management and analyze mitigation projects.” (ROD, Final Supplemental EIS for the Pinedale Anticline Oil and Gas Exploration and Development Project)
- “The operators will contribute to UDWR for monitoring greater sage-grouse, whether the continued telemetry study or other, more aggressive means of monitoring, if necessary, including experimental designs.” (Bill Barrett Corporation [BBC], EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)
- “Sage-grouse surveys are required throughout the project area for the current breeding season and results reviewed by a BLM biologist. This condition will be implemented on an annual basis for the duration of surface disturbing activities.” (Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015)
- “XTO, BLM, and the Colorado Parks and Wildlife (CPW) initiated in discussions regarding future development plans in the Piceance Basin, potential mitigations to reduce environmental impacts to wildlife, and strategies to obtain approval of year-round and continuous activities. The objective of the discussions was to develop a Wildlife Mitigation Plan (WMP) for XTO's leases.” (Exxon, North Hatch Gulch Project, EA DOI-BLM-CO-110-2010-0200-EA)

#### **Mitigation Efforts Required Under NEPA**

- “The Operators will establish a fund for compensatory mitigation as part of their operation. This fund will be administered by the Jonah Interagency Monitoring and Mitigation Office (JIO) established by this ROD (see Appendix C). The JIO will evaluate monitoring and mitigation effectiveness and provide annual adaptive management recommendations as appropriate to the BLM for consideration. WGFD and the Governor of Wyoming have coordinated on these strategies.” (Record of Decision [ROD] for the Jonah Infill Drilling Project EIS)
- “Establish a Pinedale Anticline Project Office to obtain, collect, store, and distribute monitoring information to support adaptive management and analyze mitigation projects.” (ROD, Final Supplemental EIS for the Pinedale Anticline Oil and Gas Exploration and Development Project)
- “The operators will contribute to UDWR for monitoring greater sage-grouse, whether the continued telemetry study or other, more aggressive means of monitoring, if necessary, including experimental designs.” (Bill Barrett Corporation [BBC], EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)
- “XTO, BLM, and the Colorado Parks and Wildlife (CPW) initiated in discussions regarding future development plans in the Piceance Basin, potential mitigations to reduce environmental impacts to wildlife, and strategies to obtain approval of year-round and continuous activities. The objective of the discussions was to develop a Wildlife Mitigation Plan (WMP) for XTO's leases.” (Exxon, North Hatch Gulch Project, EA DOI-BLM-CO-110-2010-0200-EA)



- “In order to mitigate the impacts of winter drilling, BBC has included a detailed Wildlife Mitigation Plan as part of their Proposed Action. The goal of BBC’s Wildlife Mitigation Plan is to improve habitats for sage-grouse, mule deer, elk, and raptors in an effort to offset the effects of winter drilling and other potential impacts of the project.” (BBC, EIS [UT-070-05-055] for West Tavaputs Plateau Natural Gas Full Field Development Plan)

### **Adaptive Management Efforts Required Under NEPA**

- The Operators will establish a fund for compensatory mitigation as part of their operation. This fund will be administered by the Jonah Interagency Monitoring and Mitigation Office (JIO) established by this ROD (see Appendix C). The JIO will evaluate monitoring and mitigation effectiveness and provide annual adaptive management recommendations as appropriate to the BLM for consideration. WGFD and the Governor of Wyoming have coordinated on these strategies.” (Record of Decision [ROD] for the Jonah Infill Drilling Project EIS)
- “Establish a Pinedale Anticline Project Office to obtain, collect, store, and distribute monitoring information to support adaptive management and analyze mitigation projects.” (ROD, Final Supplemental EIS for the Pinedale Anticline Oil and Gas Exploration and Development Project)
- “Drilling development and reclamation activities in the ARPA will be managed through a performance-based, adaptive management process as described in appendix B. The process includes a requirement for Operators to submit an annual operating plan to the BLM RFO AO. The overall purpose of this process is to meet resource management objectives and ensure Performance Goals are achieved to the greatest extent possible. A monitoring and mitigation process will be required, and its development will begin within 30 days of the effective date of the ROD. This process will be developed by the Review Team (BLM, cooperating and interested agencies, and Operators) and will provide quantifiable criteria to identify trends associated with the Performance Goals. The process will include the types of mitigation responses that will be considered in the event that monitoring data indicate a downward trend relative to the Performance Goals. Throughout the life of the project, monitoring data will be reviewed to determine if mitigation measures are effective and leading to the achievement of reclamation and Performance Goals. The monitoring data will be evaluated on a regular basis (at least annually) and best management practices (BMPs), conditions of approval (COAs), protective measures, reclamation criteria, and mitigation measures may be modified, as appropriate, based on the monitoring results.” (ROD, Environmental Impact Statement for the Atlantic Rim Natural Gas Field Development Project)

### **IMPLEMENTATION OF COAS AND CONSERVATION MEASURES REQUIRED UNDER NEPA**

Implementation of COAs and conservation measures required by NEPA decisions occurs as part of post-NEPA adaptive management and monitoring efforts. Implementation of required

COAs and mitigation measures are generally identified and tracked by the lead federal agency and the Operators. In the case of those implemented under adaptive management, the COAs and conservation measures are not directly identified in the decision record but, nonetheless, result from the NEPA decision and the COAs that establish the adaptive management process.

Documentation was provided by the Operators to demonstrate implementation of sage-grouse conservation measures and COAs that were identified as part of adaptive management and monitoring efforts required by various NEPA decisions (Appendix O). As described above, monitoring and adaptive management are an important part of determining the effectiveness of sage-grouse COAs and conservation measures and for identifying new measures that can be used when others are ineffective or do not have the desired result. Monitoring and adaptive management are incorporated into these conservation projects, as described below.

### **Adaptive Management Implementation**

Adaptive management processes have been implemented on many of the large oil and natural gas development projects throughout the current occupied range of greater sage-grouse. BLM, the Forest Service, and most other federal and state agencies utilize an adaptive management process to monitor progress towards mitigation and conservation goals as well as to identify impacts occurring as a result of project operations and appropriate additional measures to reduce those impacts. As a result of NEPA requirements for adaptive management processes, additional required COAs, mitigation measures, and conservation objectives are identified and implemented cooperatively between the Operators and federal, state, and local stakeholder. Examples of adaptive management processes that are being implemented as required under BLM NEPA decision records include:

- The Jonah Interagency Mitigation and Reclamation Office (JIO). The JIO “was created by the Jonah Project Record of Decision (ROD) to provide overall management of on-site monitoring and off-site mitigation activities. To perform these functions, the JIO manages a \$24.5 million monitoring and mitigation fund committed by EnCana Oil & Gas (USA), Inc. and BP America Production Company.” (<http://www.wy.blm.gov/jio-papo/jio/index.htm>)
- The Pinedale Anticline Project Office (PAPO). The PAPO “was created by the Anticline Project Record of Decision (SEIS ROD) to provide overall management of on-site monitoring and off-site mitigation activities. The PAPO obtains, collects, stores and distributes monitoring information to support the adaptive management process and analyzes mitigation projects primarily focusing on mule deer, pronghorn and Greater sage-grouse.” (<http://www.wy.blm.gov/jio-papo/papo/index.htm>)
- The Atlantic Rim adaptive management process includes establishment of performance standards required under the BLM’s ROD. Performance Standards have been established for surface disturbance thresholds, reclamation, and wildlife monitoring and management. Annual stakeholder meetings are held to review progress towards the performance standards and compliance with the Atlantic Rim ROD requirements.

### **Conservation Easement Purchase and Monitoring**

Land conservation may include conservation easements for the benefit of sage-grouse and other affected species. Management plans for these areas incorporate monitoring and adaptive management as described above. Conservation easements may not be feasible or applicable in all development scenarios, but has proven to be useful in some areas across the species' range. For the Jonah Infill project in Wyoming, Operators established a fund for compensatory mitigation as part of their operation. This fund is administered by the JIO that was established by the ROD. Conservation easements were purchased and conservation plans developed to preserve and enhance pristine habitat for sage-grouse and other wildlife. A comprehensive conservation plan for the Cottonwood Ranches I, II, III, and McNeel Trust conservation easements was developed to guide the management of a contiguous block of 50,000 acres of habitat to benefit sage-grouse and other wildlife. The JIO also contributed to the acquisition of over 22,000 acres of other conservation easements and associated monitoring and conservation/habitat management plans (Carney Ranch, Cross Lazy Two Ranch, Diamond H Ranch, Espenscheid Ranches, McNeel Ranch, and MJ Ranch).

Similarly, Pinedale Anticline Project Office (PAPO) was created by the Anticline Project ROD to provide overall management of on-site monitoring and off-site mitigation activities. The PAPO obtains, collects, stores and distributes monitoring information to support the adaptive management process and analyzes mitigation projects. For example, the PAPO contributed to the acquisition of the Sommers-Grindstone Conservation Easement and associated conservation plan (over 19,500 acres, including 4,988 acres of key sage-grouse habitat) to meet the goal of offsetting impacts from the oil and natural gas development project (Appendix P).

### **Monitoring and Mitigation Efforts to Reduce Threats**

As described under Listing Factor A, infrastructure, including fences and powerlines, and noise from energy development are threats to sage-grouse. Some Operators have implemented monitoring programs for fences in oil and natural gas development areas. Fences are monitored for sage-grouse strikes and if sage-grouse fence strike areas are identified, those problem fences are subsequently equipped with strike deterrents in accordance with the methods developed by Sutton Avian Research Center. These areas are then monitored to determine the effectiveness of markers. Some Operators have implemented projects to monitor predator densities near sage-grouse habitat to study predation risk. Information from monitoring could be used to determine where perch deterrents need to be installed. Monitoring noise levels in oil and natural gas fields is used by some Operators to determine where noise levels may be affecting sage-grouse so that modifications can be made to reduce this risk. Monitoring is also used to determine if adjustments for the threshold noise levels defined in RODs are warranted as part of adaptive management.

Numerous additional efforts have been required, implemented, and monitored under adaptive management processes. Examples of activities include reclamation monitoring and revegetation; habitat improvement and habitat monitoring; sage-grouse and wildlife research; and development of new strategies for managing and improving habitats to offset impacts associated with development and operations. Examples of the various measures that have

been identified and implemented under adaptive management and the COAs and conservation measures contained in NEPA decisions are described in Appendix P.

## **CONCLUSIONS/DISCUSSION**

BLM and USFS land management decisions are increasingly focused on improving or maintaining habitat for sage-grouse. This increased focus is reflected in the required COAs and conservation measures contained in the decision records of oil and natural gas projects reviewed and approved by BLM and USFS. Of the NEPA documents reviewed and summarized in this report, an average of 6.5 COAs or conservation measures that directly address threats to greater sage-grouse were required per decision record. Additionally, on average, there was more than one required COA or conservation measure per NEPA decision that required implementation of adaptive management and monitoring efforts.

This report documents the COAs and conservation measures that are required as part of BLM and USFS NEPA decisions and documents their compliance with the PECE Policy, as they relate to sage-grouse conservation. Each category of COA and conservation measure identified in this review has been evaluated under the PECE policy (see Appendices B through N). As required elements of the BLM and USFS NEPA decisions, there is reasonable certainty that these COAs and conservation measures will be implemented with the intent of benefiting and/or avoiding and minimizing impacts to sage-grouse. While there is often variability in the implementation of these measures due to site-specific issues, project type, rate of development, and well density, all COAs and conservation measures included in the decision records for BLM or USFS NEPA processes meet the first evaluation criteria under the PECE Policy (Certainty of Implementation). This demonstrates that when appropriate conservation and mitigation measures are used, NEPA is a valid regulatory mechanism to protect and conserve sage-grouse as there is certainty that each COA or conservation measure will be implemented. The effectiveness of the NEPA process is enhanced when coupled with monitoring performed by oil and natural gas operators as well as state and federal agencies.

The COAs and conservation measures implemented under NEPA and reviewed in this report were developed using the best available science for sage-grouse. Collectively, these measures, when implemented, would result in the conservation and protection of sage-grouse populations or the avoidance and minimization of impacts to the species and its habitat and provide Certainty of Effectiveness under the PECE Policy. Because the measures required under BLM and USFS NEPA decisions would be applied across the majority of the range of the sage-grouse and meet the PECE Policy standards for Certainty of Implementation and Certainty of Effectiveness, NEPA is an adequate regulatory mechanism to protect, conserve, and enhance the status of the species and should be seriously considered as such for the 2015 USFWS listing determination.

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**APPENDIX A**  
**NEPA Documents Reviewed**

**State: Colorado**

Field Office: Grand Junction Field Office, BLM

RMP: BLM Grand Junction District. Grand Junction Resource Area, Resource Management Plan and Record of Decision, January 1987.

NEPA:

1. EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.

Field Office: Kremmling Field Office, BLM

RMP: BLM Kremmling Field Office. Kremmling Resource Area Resource Management Plan and Record of Decision. 1984.

NEPA:

1. EOG. EA for 4 Applications for Permit to Drill (APDs & ROWs) in Jackson County. DOI-BLM-CO-120-2009-0003. Bureau of Land Management Kremmling Field Office. 2009.
2. EOG. Environmental Assessment for Spicer 3-32H and Surprise 2-05H Applications for Permits to Drill (APDs) in Jackson County. CO-120-08-42-EA. Bureau of Land Management Kremmling Field Office. 2008.
3. Wellstar. EA for Applications for Permits to Drill (APDs) Bush Draw Federal 18-1 and 3-2 in Jackson County. DOI-BLM-CO-120-2009-0057-EA. Bureau of Land Management Kremmling Field Office. 2009.
4. Wellstar. EA for Applications for Permits to Drill (APDs) Federal #9-1, Bush Draw Federal #10-2, and Bush Draw Federal #15-1 wells in Jackson County. OI-BLM-CO-120-2009-0002-EA. Bureau of Land Management Kremmling Field Office. 2009.

Field Office: Little Snake Field Office, BLM

RMP: BLM Little Snake Field Office, Little Snake Record of Decision and Approved Resource Management Plan, October 2011.

NEPA:

1. Gulfport Energy Corporation/Quicksilver Corporation. Craig Dome/Bell Rock 3D Seismic Survey. DOI-BLM-CO-N010-2011-0006 EA. Little Snake Field Office, 2011.
2. Quicksilver Resources. 9 Mile 3D Seismic Project. CO-100-2008-048 EA. BLM Little Snake Field Office, 2008.

Field Office: White River Field Office, BLM

RMP: BLM White River Field Office, Record of Decision and Approved Resource Management Plan, July 1997.



NEPA:

1. EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.
2. EnCana Oil and Gas. APDs- N22-496 (16) & P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.
3. EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.
4. EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.
5. EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.
6. Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.
7. Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.
8. EnCana Oil and Gas. 16 APDs on existing well pad P28-496. DOI-BLM-CO-110-2011-0153-CX. Approved 9/6/11 by White River Field Office.
9. EnCana Oil and Gas. 16 gas wells on existing well pad (N22 496). DOI-BLM-CO-110-2012-0004-CX. Approved 12/8/11 by White River Field Office.
10. EnCana Oil and Gas. Story Gulch Application for Permit to Drill (32) - 16 additional wells on F25 pad & B36 pad each. OI-BLM-CO-110-2010-0207-DNA. Approved 9/1/10 by White River Field Office.
11. Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.

**State: Montana**

Field Office: Billings Field Office, BLM

RMP: BLM Billings Field Office. Record of Decision for the Billings Resource Management Plan. 1984.

NEPA:

1. BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.

Field Office: Butte Field Office, BLM

RMP: BLM Lewiston and Butte Field Office. Record of Decision for the Final Environmental Impact Statement Headwaters Resource Management Plan. 1984.

NEPA: none

Field Office: Dillon Field Office, BLM

RMP: BLM Dillon Field Office. Record of Decision and Approved Dillon Resource Management Plan. 2006.

NEPA: none

Field Office: Lewistown Field Office, BLM

RMP: BLM Lewiston and Butte Field Office. Record of Decision for the Final Environmental Impact Statement Headwaters Resource Management Plan. 1984.

BLM Lewistown and Malta Field Office. West HiLine Resource Management Plan Environmental Impact Statement. 1988.

NEPA: none

Field Office: Malta Field Office, BLM

RMP: BLM Lewistown and Malta Field Office. West HiLine Resource Management Plan Environmental Impact Statement. 1988.

BLM Malta Field Office. Judith Valley Phillips Resource Management Plan (JVPRMP), September 1994.

NEPA:

1. Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December 2008.

Field Office: Miles City Field Office, BLM

RMP: BLM Miles City Field Office. Big Dry Resource Management Plan and Final Environmental Impact Statement. 1996.

BLM Miles City Field Office. Powder River Resource Management Plan and Environmental Impact Statement. 1985.

NEPA:

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**State: Nevada**

Field Office: Egan Field Office, BLM

RMP: BLM Egan Field Office. Ely District Record of Decision and Approved Resource Management Plan. BLM/NV/PL-G109/25+1793. August 2008.

NEPA: none

Field Office: Tonopah Field Office, BLM

RMP: BLM Tonopah Field Office. Approved Tonopah Resource Management Plan and Record of Decision, October 1997.

NEPA: none

Field Office: Tuscarora Field Office, BLM

RMP: BLM Wells and Tuscarora Field Office. December 2005 Oil & Gas Lease Sale RMP Amendment, BLM/EK/PL-2005/030. September 2005.

BLM Wells and Tuscarora Field Office. Elko Resource Management Plan Record of Decision, 1987.

NEPA:

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2. Noble. Huntington Valley Proposed Oil & Gas Development. DRAFT. In progress January 2014.

Field Office: Wells Field Office, BLM

RMP: BLM Wells and Tuscarora Field Office. Elko Resource Management Plan Record of Decision, 1987.

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NEPA:

1. Noble. Marys River 3D Seismic Project. DOI-BLM-NV-E030-2012-0518-EA. Elko District – Wells Field Office. August 2012.
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## **State: Utah**

Field Office: Ashley National Forest, USFS

RMP: Forest Service, Ashley and Uinta National Forest. Record of Decision for Ashley National Forest Land and Resource Management Plan, 1986.

NEPA:

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Field Office: Cedar City Field Office, BLM

RMP: BLM Cedar City Field Office, Cedar/Beaver/Garfield/Antimony Record of Decision and Resource Management Plan, October 1986.

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Field Office: Fillmore Field Office, BLM

RMP: BLM Fillmore Field Office. House Range Resource Area RMP & ROD Rangeland Program Summary, October 1987.

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NEPA: none

Field Office: Grand Staircase Escalante Nat Monument, BLM

RMP: BLM Grand Staircase-Escalante National Monument Management Plan, BLM/UT/PT-99/020+1610, February 2000.

NEPA: none

Field Office: Kanab Field Office, BLM

RMP: BLM Kanab Field Office. Record of Decision and Approved Resource Management Plan, BLM-UT-PL-09-006-1610, UT-110-2007-022, October 2008.

NEPA: none

Field Office: Moab Field Office, BLM

RMP: BLM Moab Field Office. Record of Decision and Approved Resource Management Plan, BLM-UT-PL-09-001-1610, UT-060-2007-04, October 2008.

NEPA: none

Field Office: Price Field Office, BLM

RMP: BLM Price Field Office. Record of Decision and Approved Resource Management Plan, BLM-UT-PL-09-005-1610, UT-070-2002-11, October 2008.

NEPA:

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Field Office: Richfield Field Office, BLM

RMP: BLM Richfield Field Office. Record of Decision and Approved Resource Management Plan, BLM-UT-PL-09-002-1610, UT-050-2007-090 EIS, October 2008.

NEPA: none

Field Office: Salt Lake Field Office, BLM

RMP: BLM Salt Lake Field Office. Record of Decision for the Pony Express Resource Management Plan and Rangeland Program Summary for Utah County. January 1990.

NEPA: none

Field Office: Vernal Field Office, BLM

RMP: BLM Vernal Field Office, Record of Decision and Approved Resource Management Plan, BLM-UT-PL-09-003-1610, UT-080-2005-71. October 2008.

NEPA:

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3. QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT\_G010-2012-0151, BLM Vernal Field Office. 2012.
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5. XTO Energy. River Bend Unit Infill Development Environmental Assessment and Biological Assessment, UT-080-07-772, January 2013.

**State: Wyoming**

Field Office: Buffalo Field Office, BLM

RMP: BLM Buffalo Field Office. Approved Buffalo Resource Management Plan. April 2001.

NEPA:

1. Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.
2. EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.
3. Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.
4. Anadarko Petroleum Company, Powder River 2D Seismic Survey Environmental Assessment (EA), WY-070-EA11-343 Buffalo Field Office, Bureau of Land Management, 2011.
5. Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.
6. Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.
7. Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office, Buffalo, Wyoming, 2009.
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12. Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek

- Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.
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  15. Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.
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  17. Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.
  18. Lance Oil & Gas Company. Kinney Divide Unit Epsilon Plan of Development Environmental Assessment, WY-070-12-148, 2012.
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  20. Lance Oil & Gas Company. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.
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30. Lance Oil & Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.
31. Petro-Canada Resources. Mitchell Draw Unit 2 Environmental Assessment WY-070-07-139, 2008.
32. Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.
33. Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.
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Field Office: Casper Field Office, BLM

RMP: BLM Casper Field Office, Record of Decision and Approved Casper Resource Management Plan, BLM/WY/PL-08/005+1610. December 2007.

NEPA:

1. Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.
2. Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.
3. Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.
4. Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.
5. Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.

Field Office: Kemmerer Field Office, BLM

RMP: BLM Kemmerer Field Office. Record of Decision and Approved Kemmerer Resource Management Plan, BLM/WY/PL-10/014+1610. May 2010.

NEPA: none

Field Office: Lander Field Office, BLM

RMP: BLM Lander Field Office. ROD for the Lander Resource Management Plan. 1987.

NEPA:

1. Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.
2. Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.
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Field Office: Pinedale Field Office, BLM

RMP: BLM Pinedale Field Office. Record of Decision and Approved Pinedale Resource Management Plan. November 2008.

NEPA:

1. Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.
2. Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.
3. Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.
4. QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.
5. QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.
6. QEP. Drilling of 180 Wells and Constructing or Expanding 6 Pads. WY-100-EA13-72. Approved by BLM Pinedale July 2013.

Field Office: Rawlins Field Office, BLM

RMP: BLM Rawlins Field Office. Record of Decision and Approved Rawlins Resource Management Plan. December 2008.

NEPA:

1. Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.
2. Anadarko. Doty Mountain Plan of Development D in Atlantic Rim. DOI-BLM-WY-030-2012-0093-EA. 2012.
3. Anadarko. Doty Mountain POD C in Atlantic Rim EA. WY-030-07-EA-240. 2008.
4. Anadarko. Doty Mountain Unit B Plan of Development in Atlantic Rim EA. WY-030-08-EA-049. 2008.
5. Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.
6. Double Eagle Petroleum. Catalina PODs C and D in the Atlantic Rim. WY-030-08-EA-115. 2008.
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8. Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. WY-030-08-EA-222. 2008.

9. Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013
10. Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.

Field Office: Rock Springs Field Office, BLM

RMP: BLM Rock Springs Field Office. Green River RMP, 1997.

NEPA:

1. Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.
2. Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.
3. Geokinetics. Jim Bridger Power Plant 3-D Seismic and Electromagnetic Surveys EA and Decision Record. WYW167761. WY-040-EA10-111. September 2010.
4. Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.

**APPENDIX B**  
**Seasonal Limitations and Year-Round Development**

**Table B-1. PECE Policy Evaluation – Seasonal Limitations**

Conservation Measure	Seasonal Limitations
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed these evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Seasonal Limitations</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Seasonal limitation COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Timing for implementation of seasonal restrictions is explicitly stated in each NEPA document. These are implemented annually for the life of the project.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include avoidance of activities surrounding leks within given distance buffers.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Lek attendance monitoring, monitoring of nesting and brood-rearing hens, etc. provide quantifiable parameters to measure success of the measure. Multiple sources identify that avoidance of activities surrounding leks during lekking, nesting, and early brood-rearing periods provide conservation benefit and protective measures for sage-grouse.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual lek counts are tracked by state game and fish agencies and federal land management agencies for purposes of evaluating grouse populations. Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

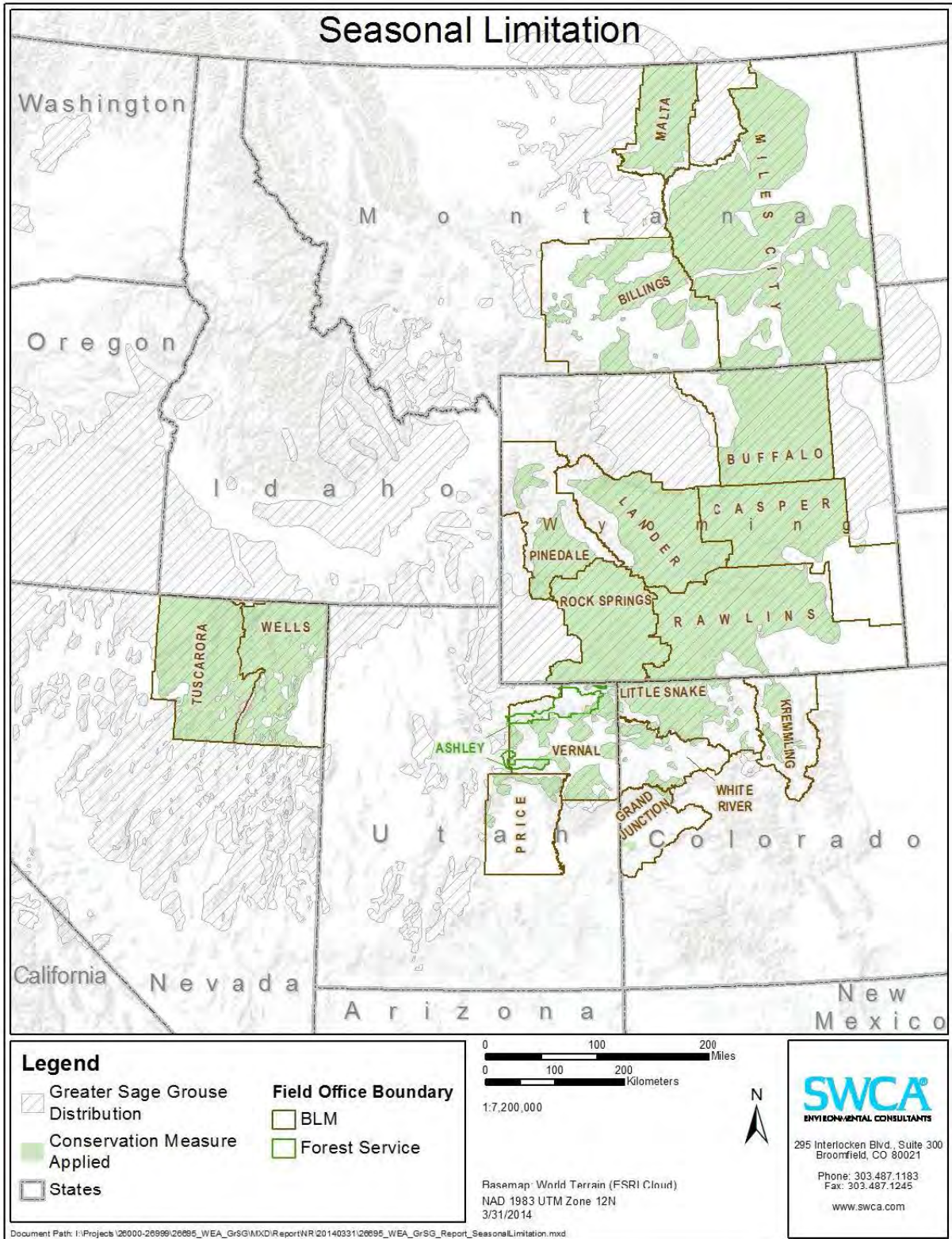


Figure B-1. Map of FOs where Seasonal Limitations are applied.

**Table B-2. Seasonal Limitation COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Company, Powder River 2D Seismic Survey Environmental Assessment (EA), WY-070-EA11-343 Buffalo Field Office, Bureau of Land Management, 2011.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of known sage-grouse leks, or within the boundaries of designated core/connectivity between March 1 and June 15, prior to completion of a greater sage-grouse lek survey.
Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of sage grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season. If surveys indicate that the identified lek is inactive during the current breeding season, surface disturbing activities may be permitted within the 2 mile buffer until the following breeding season (March 1). The required sage grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities. Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	A sage-grouse timing restriction shall apply to the entire Double Tank phase 2 project area. No surface disturbing activities are permitted within 2 miles of the Cottonwood lek (March 1-June 15), until sage-grouse surveys have been completed and determine the lek to be inactive.
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season.
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of sage grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season. Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).
Anadarko Petroleum Corporation, Dry Willow Phase V POD EA, WY-070-10-186, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Anadarko has prepared a wildlife conditions of approval map for the POD and will abide by the timing limitations and restrictions as laid out on the map. See MSUP Wildlife COA map dated 06/01/2010). The PRB FEIS programmatic document requires WL surveys for threatened and endangered or other special-concern species to be completed yearly. The WL COA map will be updated yearly to reflect the changes.
Anadarko. Doty Mountain Plan of Development D in Atlantic Rim. DOI-BLM-WY-030-2012-0093-EA. 2012.	Rawlins Field Office, BLM	Construction, drilling, reclamation, and other potentially disruptive activities in suitable Greater Sage-Grouse identified nesting and early-brood rearing habitat within two (2) miles of the perimeter of an occupied Greater Sage-Grouse lek, or in identified Greater Sage-Grouse nesting and early brood rearing habitat, would be prohibited from March 1 to July 15 for all well pad locations.
Anadarko. Doty Mountain POD C in Atlantic Rim EA. WY-030-07-EA-240. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1 to July 15 for the protection of strutting and nesting sage-grouse.
Anadarko. Doty Mountain Unit B Plan of Development in Atlantic Rim EA. WY-030-08-EA-049. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1- July 15 for the protection of sage grouse.
Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other activities potentially disruptive are prohibited during the period of March 1 to July 15 for the protection of strutting and nesting sage grouse.
Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other activities potentially disruptive to wintering sage grouse are prohibited during the period of November 15 to March 14 for the protection of sage grouse winter concentration areas, delineated by BLM and WGFD for the project area.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of the active sage-grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).



Citation	Field Office	Description
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Surface disturbing and disruptive activities will not be allowed between November 15 and March 14 in delineated winter concentration areas.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Surface disturbing and disruptive activities will not be allowed within two miles of an occupied greater sage-grouse lek or in nesting and early brood-rearing habitat associated with individual leks (when identified and delineated) from March 1 to July 15.
Ballard Petroleum. Nipple Butte 3-D Seismic Project, Categorical Exclusion WY-070-CX12-196. 2013.	Buffalo Field Office, BLM	Disruptive activities are prohibited or restricted on public surface in the project area from March 15th through June 30 in suitable sage-grouse nesting and early brood-rearing habitat.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest, USFS	From March 1 through June 30, no surface-disturbing activities (including construction, drilling, and well flaring) will be allowed for wells located within sage-grouse habitat in order to protect nesting sage-grouse.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest, USFS	To avoid disruption of sage-grouse migration activities, no well pad construction, road construction, drilling, or work-over rigs will be allowed on ridge tops from November 15 to March 1 within 4 miles of a lek.
Bill Barrett Corporation, Merganser 3-Dd Seismic Project. Categorical Exclusion WY-070-CX12-197. 2012.	Buffalo Field Office, BLM	Disruptive activities are prohibited or restricted on public surface in the project area from March 15th through June 30 in suitable sage-grouse nesting and early brood-rearing habitat.
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted from March 1 to June 15 in the locations near sage-grouse for the life of the project
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	No exceptions will be granted to seasonal restrictions in areas that the UDWR and the BLM have identified as the core winter-use sage grouse areas.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	No winter development (i.e., construction, drilling, or completion activities) will be allowed in core winter use areas on Prickly Pear Bench or in the Peters Point area between December 1 - March 14.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Surface use is prohibited between March 1 – June 15 in grouse nesting habitat within 2 miles of a known lek. This measure does not apply to the operation and maintenance of production facilities. This measure will be implemented to protect sharptail and sage grouse nesting habitat from disturbance during spring and early summer in order to maximize annual production of young, and to minimize disturbance to nesting activities adjacent to nesting sites for the long-term maintenance of grouse populations in the area.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Winter range- Surface use is prohibited from December 1 through March 31 within designated crucial winter range to protect sage grouse from disturbance during winter season use.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM Rock Springs Field Office, BLM	In accordance with BLM Instruction Memorandum 2010-012 and the Green River and Rawlins RMPs, no surface disturbing and/or disruptive activities are allowed within 2 miles of any occupied or undetermined lek between March 1 and July 15 to protect nesting greater sage-grouse.
Coleman Oil & Gas. Wilkinson POD. EA # WY-070-11-38. 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of the Spring Creek lek (S06 T42N R72W) between March 15 and June 30, prior to completion of a sage-grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities. See attached map for affected wells and infrastructure.
Devon Energy Company, L.P., Grayling POD EA, WY-070-10-332, Buffalo Field Office, 2011.	Butte Field Office, BLM	No surface-disturbing activities shall occur within sage-grouse nesting habitat, from 15 March through 30 June, annually.
Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of sage grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15)

Citation	Field Office	Description
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of the Tear Drop lek (NESW Section 33, T50N, R79W) and the Tear Drop II lek (SWNE Section 32, T50N, R79W) between March 1 and June 15, prior to completion of a greater sage-grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).
Double Eagle Petroleum. Catalina PODs C and D in the Atlantic Rim. WY-030-08-EA-115. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other activities potentially disruptive to wintering sage-grouse are prohibited during the period of November 15 to March 14 for the protection of sage grouse winter concentration areas. Several years of data compiled by BLM and WGFD was used to identify wintering sage grouse locations and their associated wintering habitat.
Double Eagle Petroleum. Catalina PODs C and D in the Atlantic Rim. WY-030-08-EA-115. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1 to July 15 for the protection of strutting and nesting sage-grouse.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. WY-030-08-EA-222. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other activities potentially disruptive to wintering sage-grouse are prohibited during the period of November 15 to March 14 for the protection of sage grouse winter concentration areas. Several years of data compiled by BLM and WGFD was used to identify wintering sage grouse locations and their associated wintering habitat.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. WY-030-08-EA-222. 2008.	Rawlins Field Office, BLM	Construction, drilling, reclamation and other potentially disruptive activities are prohibited during the period of March 1 to July 15 for the protection of strutting and nesting sage-grouse.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Surface disturbing and/or disruptive activities are prohibited from March 15 to June 30 in all nesting and early brood-rearing habitats inside core regardless of distance from the lek.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Surface disturbing and/or disruptive activities are prohibited in winter concentration areas from December 1 to March 14.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Avoid disturbance to big game (American elk and mule deer) production areas (from April 15 to July 15) and winter range (January 1 to April 15) wherever possible; however, this will be a secondary consideration to preserving sage-grouse habitat.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Multiple rig moves would not occur simultaneous; however, EnCana would use reasonable efforts to schedule rig moves outside of the Critical Habitat Season.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	New disturbance would be restricted within nesting and brood-rearing habitat as much as possible from April 15th to July 1st.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Pipeline construction and installation would be scheduled outside the Critical Habitat Season.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Upon completion of new disturbance, EnCana would leave the new disturbance area undisturbed for a minimum of two, and preferably three, full sage-grouse Critical Habitat Seasons (April 15 to August 1) during which no new disturbance would be conducted.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Well maintenance will not be considered new disturbance, but would be minimized to the extent practicable during the Critical Habitat Season. EnCana would provide the CPW and BLM notice of well maintenance and would maintain records of these operations.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	A 3-mile buffer zone would be established around known leks, and construction activity in this buffer zone would be restricted between March 15 and July 15 to minimize effects to breeding, egg-laying, incubating, and brooding sage-grouse. BLM may grant exceptions in the absence of suitable nesting and brooding habitats and is also in the process of evaluating whether to increase the buffer zone.

Citation	Field Office	Description
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	New surface disturbance, especially vegetation removal, shall not be allowed between May 15 and July 15, to prevent potential taking of migratory birds and/or eggs, unless otherwise approved in writing by the BLM Authorized Officer.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Avoid disturbance and disruptive activities in sage-grouse winter habitat from November 15 - March 14 (Newcastle FO).
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing and/or disruptive activities are prohibited or restricted from March 1 to July 15 in sage-grouse nesting and early brood-rearing habitat within 2 miles of any occupied age-grouse lek.
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing and/or disruptive activities are prohibited or restricted from March 1–July 15 in sage-grouse nesting and early brood-rearing habitat within 2 miles of any occupied Sage-grouse lek.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing and/or disruptive activities are prohibited or restricted from March 1– July 15 in sage-grouse nesting and early brood-rearing habitat within 2 miles of any occupied Sage-grouse lek.
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during Greater Sage-Grouse breeding and nesting period (March 15 – June 30), for the well pad #274.
EOG. Environmental Assessment for Spicer 3-32H and Surprise 2-05H Applications for Permits to Drill (APDs) in Jackson County. CO-120-08-42-EA. Bureau of Land Management Kremmling Field Office. 2008.	Kremmling Field Office, BLM	If EOG’s drilling activity does not occur in the planned timeframe (July-October 2008), they would be required to consult with the BLM to discuss potential sage-grouse issues.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	Impacts to nesting sagebrush-obligate passerine birds would be avoided/minimized by keeping off-road vehicles out of sagebrush habitat in compliance with sage-grouse nesting habitat stipulations from April 15 through July 7.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	No buggy- or heli-drilling or shot hole explosives detonation on public lands would be permitted within BLM-designated greater sage grouse nesting habitat (suitable nesting cover) from April 1 through July 7.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	Timing restrictions would be imposed in areas of known sage-grouse activity or suitable habitat (i.e. all sagebrush or mountain shrub communities in the Magnolia area). Surface use, disturbance (staging areas and helicopter landing sites/zones) and overhead activities (less than 300 feet above ground level) would not be allowed between April 1 and August 1 in sage-grouse nesting and brood-rearing areas.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Surface-disturbing activities will not be allowed between March 1 and July 15 in sage-grouse nesting and brood-rearing areas.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Prohibit surface disturbance within two miles of an active or known Greater sage-grouse lek between March 1 and June 30, unless excepted.
Fidelity Exploration & Production Company. Coal Bed Natural Gas Tongue River - Deer Creek North Federal Project. Environmental Assessment MT-020-2008-310. Finding of No Significant Impact and Decision Record, 2008.	Miles City Field Office, BLM	Surface use is prohibited from March 1 to June 15 in grouse nesting habitat within 2 miles of a lek. This lease stipulation does not apply to the operation and maintenance of production facilities.
Fidelity Exploration and Production Company. Coal Bed Natural Gas Tongue River – Decker Mine East Federal Project. Finding of No Significant Impact and Decision Record. Environmental Assessment MT-020-2008-345. 2008.	Miles City Field Office, BLM	Surface use is prohibited from March 1 to June 15 in grouse nesting habitat within 2 miles of a lek. This lease stipulation does not apply to the operation and maintenance of production facilities.
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	Federal lease stipulation prohibits construction and drilling activities from March 1 to June 15 for protection of grouse nesting habitat within two miles of an active lek.

Citation	Field Office	Description
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	No new construction or surface-disturbing activities will be conducted between March 1 and June 30 each year within greater sage-grouse nesting areas (a 2-mile radius of strutting grounds in areas of sagebrush vegetation) until an activity survey was completed. The survey will be conducted by a qualified biologist to determine the presence or absence of nesting greater sage-grouse. The activity survey will be conducted each year between April 1 and April 15, or as determined in coordination with the AO to account for annual climate fluctuations, and the results will be reported to the AO. If active nesting areas are documented during the annual survey, no new construction and surface-disturbing activities will take place within 0.5 mile of those nesting areas during the nesting period identified by the AO.
Geokinetics. Jim Bridger Power Plant 3-D Seismic and Electromagnetic Surveys EA and Decision Record. WYW167761. WY-040-EA10-111. September 2010.	Rock Springs Field Office, BLM	Project activities are scheduled to avoid wildlife conflicts; however, if the schedule changes, the following seasonal restrictions would be enforced: Avoid greater sage-grouse nesting areas March 15 through July 15.
Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.	Buffalo Field Office, BLM Casper Field Office, BLM Lander Field Office, BLM Miles City Field Office, BLM	Greencore has committed to not constructing during the greater sage-grouse breeding season (March 15 – June 30).
Gulfport Energy Corporation/Quicksilver Corporation. Craig Dome/Bell Rock 3D Seismic Survey. DOI-BLM-CO-N010-2011-0006 EA. Little Snake Field Office, 2011.	Little Snake Field Office, BLM	To minimize the potential for disturbing grouse during the nesting season and preventing accidental destruction of nests, no seismic activities (including driving vibroseis trucks or OHVs) would be allowed within mapped nesting habitat from March 1 through June 30. This mitigation does not apply to casual use, such as hiking in to an area to lay down receiving lines. This timing limitation would apply to BLM lands located in T6N, R91W, Sections 29 and 30 and T6N, R92W, Sections 19, 20, 23, 25, 29, 31, 34, 35 and 36.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Surface-disturbing and disruptive activities in greater sage-grouse nesting and early brood-rearing habitat within 2.0 miles of an occupied lek, or in identified greater sage-grouse nesting and early brood-rearing habitat outside the 2.0-mile buffer will be prohibited from March 15 through July 15.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Surface-disturbing and disruptive activities in greater sage-grouse winter habitat will be avoided from November 15 through March 14.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	No surface disturbing activities will occur within 2 miles of an active greater sage-grouse lek during the breeding season (February 15 through June 15). Outside of the breeding season, existing roads and facilities will be utilized to the extent possible, and any new development will be located as far away from the lek as possible.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	No surface disturbing activities will occur within identified greater sage-grouse crucial winter habitat in the southern portion of the GNBPA from November 15 to March 14.
Lance Oil & Gas Co. Kinney Divide Unit Epsilon Plan of Development Environmental Assessment, WY-070-12-148, 2012.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during sage-grouse breeding and nesting period (March 15 –June 30)
Lance Oil & Gas Company Inc. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	No surface-disturbing activities are permitted from March 15 to June 30. This condition will be implemented on an annual basis.
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted from March 15 to June 30. This condition will be implemented on an annual basis for the life of the project.
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during sage-grouse breeding and nesting periods (March 15 – June 30), for the entire Bear Draw Gamma POD project. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of the Fleetwood Draw, Double Cross, Frank and Alvaro sage-grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).
Lance Oil & Gas Company, KDU Gamma Plan of Development Environmental Assessment WY-070-EA10-271, 2010.	Buffalo Field Office, BLM	No surface-disturbing activities shall occur within sage-grouse habitat, from 1 March through 15 June, annually.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted from March 1 to June 15 (may change to March 15-June 30 to meet Wyoming Game and Fish, BLM IM). This condition will be implemented on an annual basis for the life of the project.

Citation	Field Office	Description
Lance Oil & Gas Inc., Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season. If surveys indicate that the identified lek is inactive during the current breeding season, surface disturbing activities may be permitted within the 2 mile buffer until the following breeding season (March 1). The required sage grouse survey will be conducted by a biologist following the most current WGF D protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities. Well metering, maintenance and other site visits within 2.0 miles of documented sage grouse lek sites should be minimized as much as possible during the breeding season (March 1– June 15).
Lance Oil & Gas Inc., Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of Ploessers Dry Lake, Indian Creek II, III, IV, and Cat Creek 1 sage-grouse leks between March 1 and June 15, prior to completion of a greater sage-grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of sage grouse lek(s) between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	In order to protect the nesting area around the strutting ground, exploration, drilling, and other development activity will be allowed within a 1 3/4 –mile distance from the ¼-mile lek protection zone only during the period June 15 to March 1.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	Surface disturbing activities are prohibited from March 15 to June 30 in suitable sage-grouse nesting and early brood-rearing habitat within mapped habitat. This condition will be implemented on an annual basis for the life of the project.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	Surface disturbing activities are prohibited from March 15 to June 30 in suitable Greater Sage-Grouse nesting and early brood-rearing habitat within mapped habitat. This condition will be implemented on an annual basis for the life of the project.
Lance Oil and Gas Company, Inc., Sahara Plan of Development (POD) Environmental Assessment WY-070-EA13-72, 2013.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during the Greater Sage-Grouse breeding and nesting period (March 15 – June 30).
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted for the locations, access roads, and impoundments listed below between March 15-June 30. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM	Project activities would occur outside the breeding season for sage-grouse (March 15 to May 30), outside the breeding seasons for raptor species (March 15 to July 31), and would maintain a 50-foot buffer from active pygmy rabbit burrows.
Noble Energy. Huntington Valley Proposed Oil & Gas Development. DRAFT. In progress January 2014.	Tuscarora Field Office, BLM	This lease contains lands which have been identified as sage grouse crucial winter habitat that are subject to seasonal protection from disturbance. Seasonal restrictions from disturbance in sage grouse crucial winter habitat apply during the period November 1 to March 15. This stipulation does not apply to operating facilities.
Noble Energy. Huntington Valley Proposed Oil & Gas Development. DRAFT. In progress January 2014.	Tuscarora Field Office, BLM	This lease contains lands which have been identified as sage grouse brood rearing areas that are subject to seasonal protection from disturbance. Seasonal restrictions from disturbance in sage grouse brood rearing areas apply within 0.5 miles or other appropriate distance based on site-specific conditions from 5/15 to 8/15, inclusive. This restriction does not apply to operating facilities.
Noble Energy. Mary’s River Exploration Wells Project. BLM Elko District Office, Nevada. DRAFT. In progress January 2014.	Wells Field Office, BLM	This lease contains lands which have been identified as sage grouse brood rearing areas that are subject to seasonal protection from disturbance. Seasonal restrictions from disturbance in sage grouse brood rearing areas apply within 0.5 miles or other appropriate distance based on site-specific conditions from 5/15 to 8/15, inclusive. This restriction does not apply to operating facilities.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	Disturbance and disruptive activities are prohibited in sage grouse winter concentration areas November 15 through March 14. <sup>1</sup>
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	Surface disturbing and disruptive activities are prohibited in suitable sage grouse nesting and early brood rearing habitat within 2 miles of an occupied lek or in identified sage grouse nesting and early brood rearing habitat outside the 2 mile buffer March 15 to July 15. <sup>1</sup>
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	Disturbance and disruptive activities are prohibited in sage grouse winter concentration areas November 15 through March 14. <sup>1</sup>
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	Surface disturbing and disruptive activities are prohibited in suitable sage grouse nesting and early brood rearing habitat within 2 miles of an occupied lek or in identified sage grouse nesting and early brood rearing habitat outside the 2 mile buffer March 15 to July 15. <sup>1</sup>

Citation	Field Office	Description
QEP. Drilling of 180 Wells and Constructing or Expanding 6 Pads. WY-100-EA13-72. Approved by BLM Pinedale July 2013.	Pinedale Field Office, BLM	Disturbance and disruptive activities are prohibited in sage-grouse winter concentration areas November 15 to March 15. <sup>1</sup>
QEP. Drilling of 180 Wells and Constructing or Expanding 6 Pads. WY-100-EA13-72. Approved by BLM Pinedale July 2013.	Pinedale Field Office, BLM	Surface disturbing and disruptive activities are prohibited in suitable sage-grouse nesting and early brood-rearing habitat within 2 miles of an occupied lek, or in identified sage-grouse nesting and early brood-rearing habitat outside the 2 mile buffer March 15-July 15. <sup>1</sup>
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	No surface disturbing activities allowed within 2 miles of active lek from March 1 - June 15.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	No surface disturbance will be allowed within greater sage grouse strutting and nesting habitat between March 1 and June 30.
Quicksilver Resources. 9 Mile 3D Seismic Project. CO-100-2008-048 EA. BLM Little Snake Field Office, 2008.	Little Snake Field Office, BLM	No surface disturbing activities will occur between March 1 and June 30 within a 2 mile radius of leks within suitable nesting habitat (projected timeframe for seismic exploration is late summer and fall). No exceptions will be granted for this restriction.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing and disruptive activities will be avoided from March 15 to July 15 in suitable greater sage-grouse nesting and brood-rearing habitats within 2 miles of an occupied lek.
Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013	Rawlins Field Office, BLM	Avoid surface disturbing and disruptive activities, geophysical surveys, and organized recreational activities (events) that require a special use permit within identified Greater Sage-Grouse nesting and early brood rearing habitat of a sharp-tailed grouse lek, or in Greater Sage-Grouse and sharptailed grouse nesting and early brood rearing habitat from March 1 to July 15.
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during sage-grouse breeding and nesting periods (March 15 – June 30), for all federal wells and all associated infrastructure wells in the portions of the Cabin Creek 7 POD within T58N, R77W Sections 20, 21, 27, 28, 29, 31, 32, and 33.
Wellstar. EA for Applications for Permits to Drill (APDs) Bush Draw Federal 18-1 and 3-2 in Jackson County. DOI-BLM-CO-120-2009-0057-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	CO-30: No surface disturbing activities between March 1 and June 30 in order to protect nesting greater sage-grouse.
Wellstar. EA for Applications for Permits to Drill (APDs) Federal #9-1, Bush Draw Federal #10-2, and Bush Draw Federal #15-1 wells in Jackson County. OI-BLM-CO-120-2009-0002-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	If Wellstar's drilling activity does not occur in the planned timeframe (winter 2008 or prior to March 1, 2009) on Federal 9-1, they would be required to consult with the BLM to discuss a potential closure period where no construction activities (i.e. road construction and drilling) could occur during the sage grouse breeding season (March 1 –June 30).
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted within 2 miles of a sage grouse lek between March 1 and June 15, prior to completion of a greater sage grouse lek survey. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If an active lek is identified during the survey, the 2 mile timing restriction (March 1-June 15) will be applied and surface disturbing activities will not be permitted until after the nesting season.
Williams Production RMT Company, Cedar Draw Unit 3, WY-070-EA11-236, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	No surface-disturbing activities shall occur within 2 miles of the Laramore lek (Section 26, T53N R75W), from March 15 through June 30 (Buffalo RMP Maintenance Action September 17, 2010), annually.
WPX Energy Rocky Mountain, LLC, Plans of Development North Butte 4, North Butte 3, J Christensen Federal 21-35 and Tex Draw Add 1, Environmental Assessment (EA), WY-070-EA12-123, 2013.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during sage-grouse breeding and nesting periods (March 15-June 30), for the following federal wells and all associated infrastructure.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	No disruptive activity within 2 miles of a lek from March 1 to July 15 to protect breeding, nesting and brood rearing greater sage-grouse.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	No surface-disturbing activities are permitted in suitable nesting and brood-rearing habitat within the NEO POD boundary between March 15 and June 30.
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted from March 1 to June 15. This condition will be implemented on an annual basis for the life of the project. This condition affects the entire POD.

Citation	Field Office	Description
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	No surface disturbing activities are permitted for the locations, access roads, and impoundments listed below between March 1-June 15. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If a previously unknown lek is identified during surveys, additional areas may be included in the above referenced timing restriction (March 1-June 15).
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	To further minimize impacts to sage-grouse using habitat affected by the proposed action, surface-disturbing activities will be restricted during sage-grouse breeding and nesting periods (March 1 to June 15) for project components located in sage-grouse habitat for the life of the project.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	The following wells and infrastructure will have timing limitation stipulations of no surface disturbing activities (to include maintenance, unless an emergency) from March 1-June 15 for the life of the project:
Yates Petroleum Corporation. Napier Road POD Environmental Assessment WY-070-EA10-280, 2010.	Buffalo Field Office, BLM	No surface disturbing activities are permitted during sage-grouse breeding and nesting periods (March 15 – June 30), for project components located in the sage-grouse habitat depicted as shaded areas in map below. This condition will be implemented on an annual basis for the duration of surface disturbing activities.

<sup>1</sup>Excepted in most years under year-round development authorizations defined in the Supplement EIS/ROD for the Pinedale Anticline.

**Table B-3. PECE Policy Evaluation – Year-Round Development**

Conservation Measure	Year-Round Development
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.



<b>Conservation Measure</b>	<b>Year-Round Development</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Year-round drilling COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	The objectives for year-round drilling are stated in NEPA documents and include making the drilling process more efficient, reducing the overall number of active drilling years, concentrating development into selected areas while other areas remain less disturbed, and accelerating reclamation operations.
The steps necessary to implement the conservation effort are identified in detail.	Steps necessary to implement year-round drilling are generally stated and analyzed in the NEPA documents.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Year-round drilling is used to reduce project footprints, overall duration of the drilling phase of development, and to focus development activities in localized areas for longer durations rather than spreading the impact across the landscape for short durations. This decreases traffic, noise, and other impacts and accelerates reclamation operations in areas away from where year-round drilling is occurring.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions. In Colorado, Wildlife Conservation Plans prepared in coordination with Colorado Parks and Wildlife often require monitoring of sage-grouse and other species in areas where year-round drilling is used.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

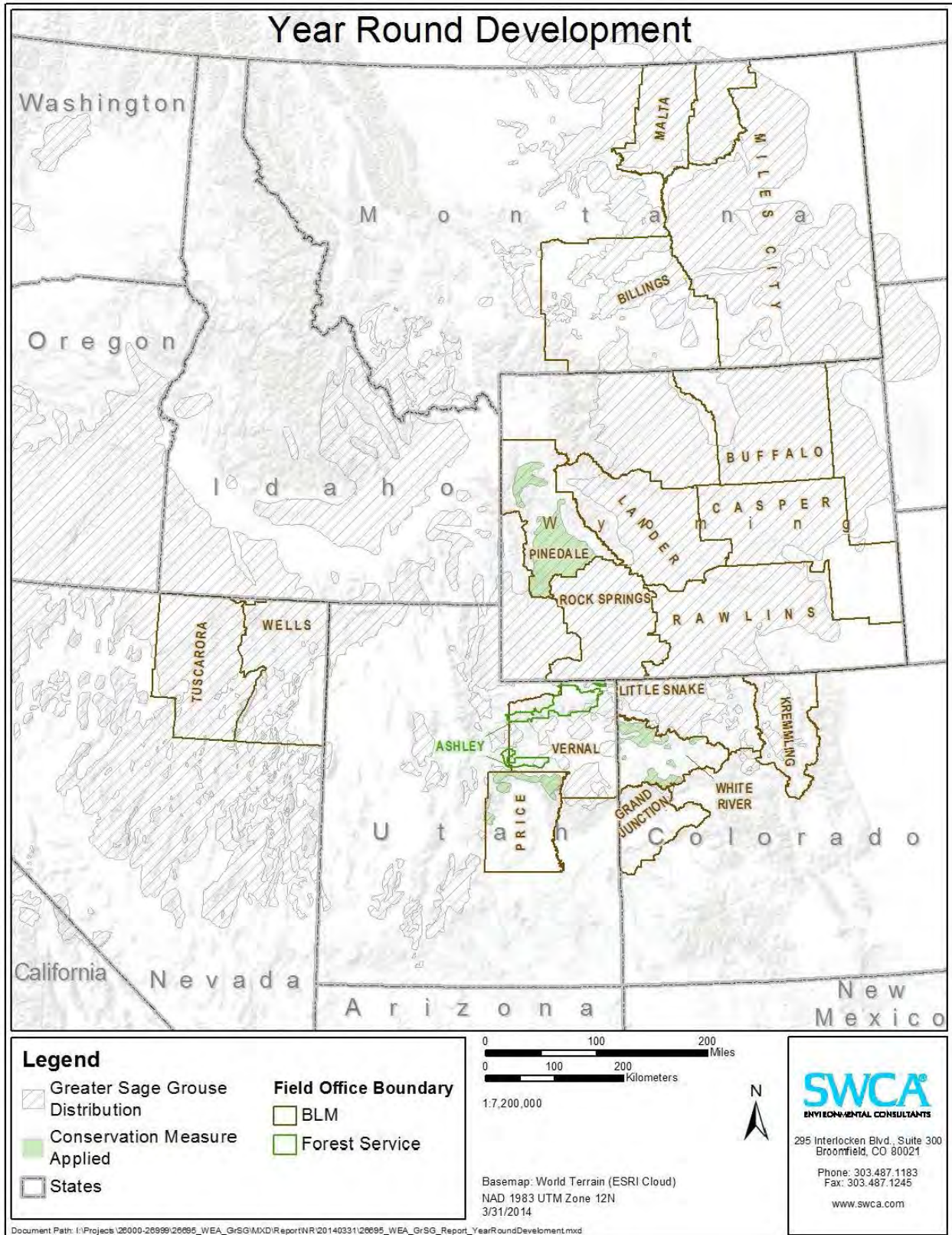


Figure B-2. Map of FOs where Year-Round Development COAs are applied.

**Table B-4. Year-Round Development COAs and Conservation Measures**

Citation	Field Office	Description
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Year round drilling would reduce drilling duration to 4-7 years compared to 21 years if no winter drilling from 11/1 to 5/15. Approval of winter drilling would be subject to annual review requirements.
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	Based on this analysis, this circumstance warrants an exception to BLM White River ROD/RMP TL-06-Timing Limitation for Sage Grouse Nest Habitat. With input by the BLM WRFO, all sage-grouse oriented best management practices and mitigation strategies have been integrated into the Proposed Action via a formal agreement between CPAW and EnCana.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The project area represents suitable and occupied nest habitat that is subject to White River ROD/RMP-approved timing limitations designed to reduce disruption of nest and early brood activities of sage-grouse. These measures, which cannot be practically applied to year-round drilling practices, can be 'excepted' by the WRFO Manager pending coordination with the CPW. Based on this analysis, this circumstance warrants an exception to BLM White River ROD/RMP TL-06-Timing Limitation for Sage Grouse Nest Habitat.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	These measures, which cannot be practically applied to year-round drilling practices, can be 'excepted' by the WRFO Manager pending consultation with the CDOW. Based on this analysis, this circumstance warrants an exception to BLM White River ROD/RMP TL-06-Timing Limitation for Sage Grouse Nest Habitat. With input by the BLM WRFO, all sage-grouse oriented best management practices and mitigation strategies have been integrated into the proposed action via a formal agreement between the Colorado Division of Wildlife and EnCana.
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	For a development scenario restricting development to one surface pad for every 400 acres to be economically viable, the use of clustered drilling for the NHGP requires that operations be conducted continuously, without interruptions, until all of the development activities on a pad are completed. A critical component of the Proposed Action is XTO's request for the granting of a modification to big game seasonal stipulation TL-08 within a buffer area of 50 meters around all proposed surface disturbance. XTO's proposed year-round and continuous drilling and operations program offers significant environmental and efficiency benefits over seasonal operations. Authorization of year-round and continuous drilling and construction would minimize the duration of operations. Assuming each well takes an average of 30 days to drill, each proposed 20-well pad can be drilled and completed in approximately 20 months using year-round and continuous operations; compared to 36 months for seasonal drilling. With 3 rigs and year-round drilling, the 120 wells could be completed within 4 years, compared to 6 years with seasonal shut downs. Year round drilling also requires less surface disturbance and interim reclamation can begin sooner. For seasonal drilling, each move and rig-up or rig-down will require more cranes and truck hauling which means increased vehicular traffic, noise and manpower compared to year-round drilling. Year-round drilling reduces rig moves and truck hauling by 75-80% depending on the number of rigs used.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	This ROD allows for year-round development and delineation activity within big game (pronghorn and mule deer) and greater sage-grouse seasonal use areas by granting exceptions to the big game and greater sage-grouse seasonal restrictions. The extent, location, and duration of relief from seasonal habitat restrictions will be determined at the annual planning meeting. No surface occupancy (NSO) restrictions for all species will remain in effect.

**APPENDIX C**  
**Reclamation**

**Table C-1. PECE Policy Evaluation – Reclamation**

Conservation Measure	Reclamation
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Reclamation</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Reclamation COAs and conservation measures address threats associated with Energy Development and Invasive Plants under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Reclamation Plans contain incremental objectives, such as reaching a certain percent cover of native vegetation after a set number of growing seasons.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified in COAs and Reclamation Plans, including implementation measures that describe soil preparation and seed mixes to use during reclamation.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Reclamation must meet quantifiable standards to be considered successful, typically a minimum cover and composition of 60-80% of the desired plant community.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual monitoring and reporting are a part of reclamation COAs. If reclamation is determined to be unsuccessful, adaptive management allows the reclamation approach to be re-evaluated.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

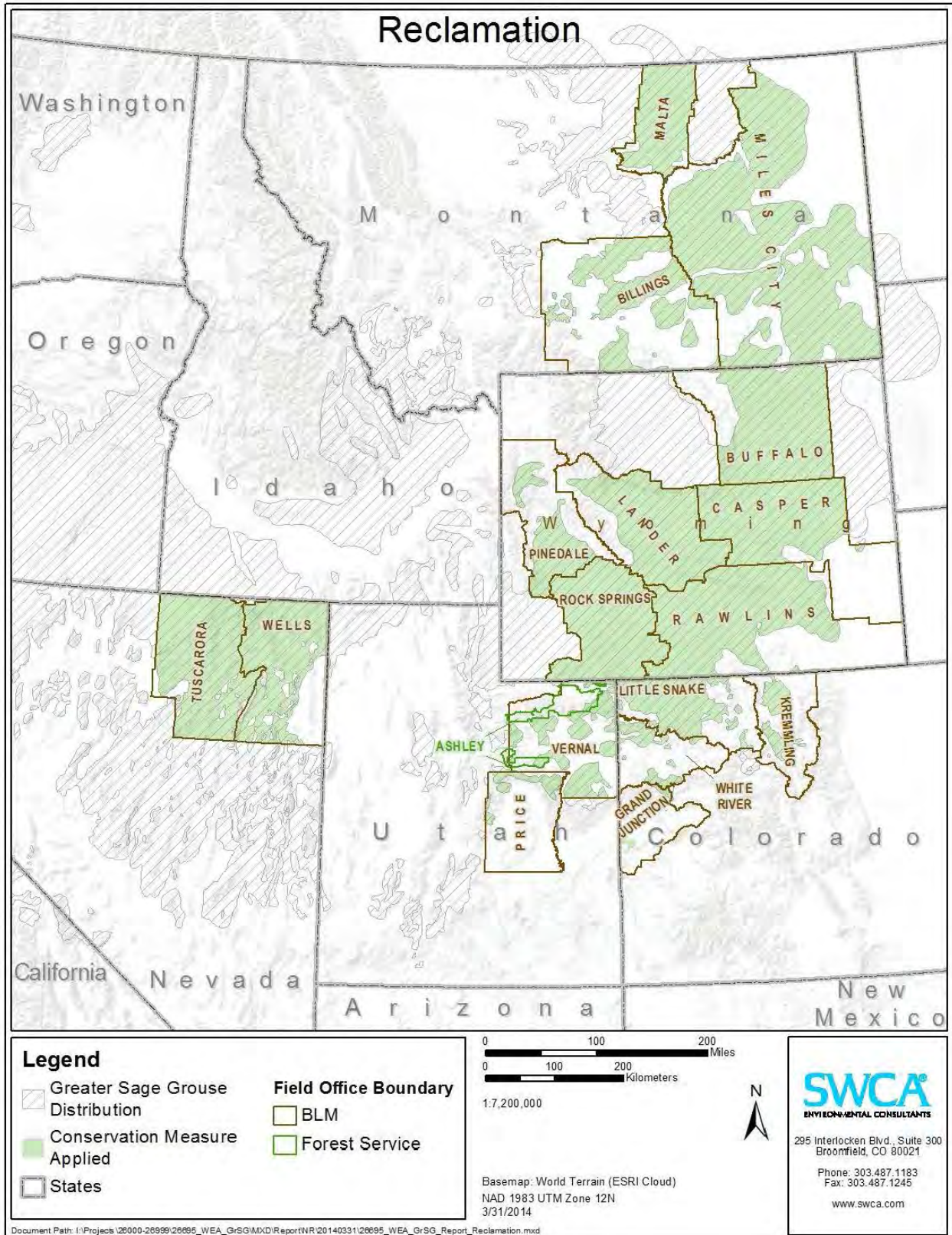


Figure C-1. Map of FOs where Reclamation COAs are applied.

**Table C-2. Reclamation COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Corporation, Dry Willow Phase V POD EA, WY-070-10-186, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Construction up to and including interim reclamation and seeding will be completed by the start of the TLS to mitigate undue impacts to wildlife (sage grouse, raptors), as well as provide for interim and final reclamation success.
Anadarko Petroleum Company, Powder River 2D Seismic Survey Environmental Assessment (EA), WY-070-EA11-343 Buffalo Field Office, Bureau of Land Management, 2011.	Buffalo Field Office, BLM	Establish species composition, diversity, structure, and total ground cover appropriate for the desired plant community. Enhance critical resource values (e.g. wildlife, range, recreation, etc.), where appropriate, by augmenting plant community composition, diversity, and/or structure.
Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Vegetation canopy cover (on unforested sites), production and species diversity (including shrubs) shall approximate the surrounding undisturbed area. The vegetation shall stabilize the site and support the planned post disturbance land use, provide for natural plant community succession and development, and be capable of renewing itself.
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Anadarko. Doty Mountain Plan of Development D in Atlantic Rim. DOI-BLM-WY-030-2012-0093-EA. 2012.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Anadarko. Doty Mountain POD C in Atlantic Rim EA. WY-030-07-EA-240. 2008.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Anadarko. Doty Mountain Unit B Plan of Development in Atlantic Rim EA. WY-030-08-EA-049. 2008.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Reclamation will be considered successful if the following Interim Reclamation criteria are met (appendix A): 80 percent of predisturbance ground cover, 90 percent dominant species, No noxious weeds present in the seeding, and Erosion features equal to or less than surrounding area. The vegetation will consist of species included in the seed mix, and/or occurring in the surrounding natural vegetation or as deemed desirable by the BLM in review and approval of the reclamation plan. The goal is no single species will account for more than 30 percent total vegetative composition. Vegetation canopy cover production and species diversity shall approximate the surrounding undisturbed area.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	For all locations and access roads, the Operator will promptly revegetate all disturbed areas not necessary for future operations with a Forest Service-approved seed mixture. Revegetation would commence immediately after construction, or immediately after the disturbed area is no longer needed for future operations. Reclamation achievement will be evaluated using the standards described in the Reclamation Plan (FEIS Appendix B). Rehabilitation efforts must be repeated if it is concluded that the success rate is below an acceptable level as determined by the Forest Service.



Citation	Field Office	Description
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	As previously discussed under the Selected Alternative, BBC and other operators will be required to track the amount of annual and cumulative surface disturbance associated with past (since 2004), present, and proposed oil and gas development activities in the WTP Project Area. In order to minimize impacts to resources of concern and ensure reclamation on Federal lands, BBC and other operators will be allowed no more than 250 acres of surface disturbance per-year, no more than 1,250 acres of new surface disturbance at any given time, and no more than 1,500 acres of cumulative surface disturbance (i.e., new surface disturbance added to past and present surface disturbance associated with oil and gas development in the WTP Project Area since 2004).
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	BBC and other operators will be required to monitor reclamation using an approved BLM method and submit monitoring reports on an annual basis.
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	PODs will include A Reclamation Plan for surface disturbance
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	The planting of grasses, forbs, trees, or shrubs beneficial to wildlife will follow the BLM seeding policy.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM	Reclamation of initial surface disturbance areas and upon Project completion subsequent reclamation of long-term surface disturbance areas, would be completed pursuant to site-specific reclamation plans in compliance with BLM policy.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rock Springs Field Office, BLM	Reclamation of initial surface disturbance areas and upon Project completion subsequent reclamation of long-term surface disturbance areas, would be completed pursuant to site-specific reclamation plans in compliance with BLM policy.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	Reclamation success will be monitored on an annual basis. Reclamation achievement will be evaluated using the standards agreed upon with the BLM PFO. Rehabilitation efforts will be repeated if it is concluded that the success rate is below an acceptable level as determined by the BLM PFO. The Operator will collect reclamation monitoring data in an electronic format and submit the spatial data and all associated attributes to the BLM along with their annual reclamation monitoring report.
Coleman Oil & Gas. Wilkinson POD. EA # WY-070-11-38. 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Devon Energy Company, L.P., Grayling POD EA, WY-070-10-332, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.

Citation	Field Office	Description
Double Eagle Petroleum. Catalina PODs C and D in the Atlantic Rim. WY-030-08-EA-115. 2008.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. WY-030-08-EA-222. 2008.	Rawlins Field Office, BLM	The Operator shall select and use a seed mix most applicable to each disturbed location with the goal of restoring individual sites to closely resemble the predisturbance native plant communities, as provided in Appendix A of the ROD "Project Reclamation Plan"
Double Eagle Petroleum. Catalina PODs G and I in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	Additional site specific vegetation inventory data would be collected by the company and submitted as part of any approved Reclamation Plan as per the Wyoming Reclamation Policy (March 2009), the Rawlins Resource Management Plan (RMP) Appendix 36 (Dec. 2008) and the ROD (March 2007) (p. A-3, Section 1.3.1) prior to any surface disturbance.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Utilize native plant species for reclamation purposes (preferably local seeds and species that are preferred by sage grouse).
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	Sage-grouse oriented reclamation (e.g., specialized seed mix, lengthened cut and fill slopes) is expected to involve all pipeline acreage and about ¾ of pad acreage (about 18 acres). Depending on subsequent ungulate use, this reclaimed acreage would serve increasingly effective brood and summer habitat function prior to the redevelopment of a suitable sagebrush canopy (10-15 years).
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	All disturbed surfaces shall be promptly revegetated with certified weed-free seed per agency policy. BLM policy is to use native species for revegetation. Exceptions may be granted under certain conditions, such as the use of noninvasive non-native forbs when native forbs are unavailable or unlikely to succeed due to adverse conditions.
EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.	White River Field Office, BLM	Re-vegetate with the native seed mix number six (listed below) prior to the first full growing season following completion of drilling (unless a different seed mix is recommended in any of the wildlife sections or the surface owner requests a different seed mix).
EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.	White River Field Office, BLM	Successful re-vegetation should be achieved within three years. Successful reclamation and re-vegetation is defined by the following: A functioning vegetation community will present a minimum cover and composition of 80 percent of the Desired Plant Community as defined by the ecological site description or in relation to the seed mix applied. In cases where wildlife objectives are dependent upon presence of forbs within the community BLM will require their presence at the 80 percent calculation. The functioning vegetation community established on the reclaimed site is capable of persisting on the site without continued intervention and will allow plant community successional processes to develop to the climax community.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	BLM recommends that the interim and final reclamation seed mix for this project refrain from the use of deciduous shrubs (i.e., Utah serviceberry, Wood's rose, and snowberry). Optional forb components that best meet the nutritional demands of grouse broods should be considered a priority, including sulphur flower, Utah sweetvetch, and yarrow. Due to general absence or tendency to naturally recolonize disturbed sites in the project locale, the use of lupine and, especially, white sage should be avoided.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Interim reclamation would be completed as quickly as possible to redevelop ground cover that provides for secure ground movements of sage-grouse and is an effective precursor to the reestablishment of appropriate sagebrush cover. Disturbances exceeding 15 feet in width in mapped sage-grouse priority occupied habitat would be reseeded with local sagebrush seed, where topography and weather conditions allow safe access to do so. Detailed guidelines and practices for interim and final reclamation are outlined in EnCana's NPR Integrated Vegetation Management Guidance (WWE 2009).
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant voluntarily uses enhanced interim reclamation procedures and seed mixes that offer improved herbaceous forage and cover redevelopment opportunities for grouse.

Citation	Field Office	Description
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The reclamation success criteria should result in a minimum cover and composition of 80 percent of the Desired Plant Community (as defined by the ecological site, in an early seral state) or in relation to the seed mix applied within three growing seasons after the application of seed. This community should be capable of persisting on the site without intervention and allow for successional processes consistent with achieving the seral stage on the site prior to surface disturbance. Reclamation achievement should be evaluated using the Public Land Health Standards that include Indicators of Rangeland Health.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Disturbed areas would be seeded and stabilized in accordance with BLM-approved reclamation guidelines. During reclamation, a variety of native forage species would be used to return disturbed areas to conditions similar to those that existed before the proposed project.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	All areas of the well pads not used during any production phase, including cut and fill slopes, should be re-contoured as much as possible to natural topography, and have topsoil redistributed where likely to revegetate successfully (e.g., along appropriate cut and fill slopes or at the top edge of the borrow ditches), where it will not be disturbed during regular road maintenance activities. Re-vegetated with the native seed mix #6 (listed below) prior to the first full growing season following completion of drilling (unless a different seed mix is recommended in any of the wildlife sections or the surface owner requests a different seed mix). Seeding rates listed in the table below are shown as pounds of Pure Live Seed (PLS) per acre and apply to drill seeding. When drill seeding is not feasible (e.g. steep slopes, etc.), then broadcast seed using double the seeding rate followed by harrowing to ensure seed coverage. Applied seed should be certified and free of noxious weeds.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	Successful re-vegetation should be achieved within three years. Successful reclamation and re-vegetation is defined by the following: A functioning vegetation community will present a minimum cover and composition of 80% of the Desired Plant Community as defined by the ecological site description or in relation to the seed mix applied. In cases where wildlife objectives are dependent upon presence of forbs within the community BLM will require their presence at the 80% calculation. The functioning vegetation community established on the reclaimed site is capable of persisting on the site without continued intervention and will allow plant community successional processes to develop to the climax community
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	Seeding: Perennial vegetation must be established and additional work shall be required in cases of failure. A. Interim Reclamation: Seed all disturbed areas outside the production area, according to specified methods and seed mixture. B. Final Reclamation: Seed all recontoured and disturbed areas, according to specified methods and seed mixture. C. Hydroseeding and hydro-mulching may be used in areas of temporary seeding or in areas where drill-seeding or broadcast-seeding/raking are impractical. Hydro-seeding and hydro-mulching must be conducted in two separate applications to ensure adequate seed-to-soil contact. The seeded species will be considered firmly established when at least 50 percent of the new plants are producing seed. Reclaimed areas shall be monitored annually. The annual report shall document whether attainment of reclamation objectives appears likely. If one or more objectives appear unlikely to be achieved, the report shall identify appropriate corrective actions. Upon review and approval of the report by the BLM, the operator shall be responsible for implementing the corrective actions or other measures specified by the authorized officer.
EnCana Oil and Gas. 16 gas wells on existing well pad (N22 496). DOI-BLM-CO-110-2012-0004-CX. Approved 12/8/11 by White River Field Office.	White River Field Office, BLM	Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, or constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.
EnCana Oil and Gas. 16 APDs on existing well pad P28-496. DOI-BLM-CO-110-2011-0153-CX. Approved 9/6/11 by White River Field Office.	White River Field Office, BLM	Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, or constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	Reclamation activities may include, but are not limited to, seed bed preparation that requires disturbance of surface soils, seeding, or constructing exclosures (e.g., fences) to exclude livestock from reclaimed areas.
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency

Citation	Field Office	Description
EOG. EA for 4 Applications for Permit to Drill (APDs & ROWs) in Jackson County. DOI-BLM-CO-120-2009-0003. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	The lessee is required to use the reclamation practices necessary to reclaim all disturbed areas. Reclamation will ensure surface and subsurface stability, growth of a self-regenerating permanent vegetative cover and compatibility with post land use. The vegetation will be diverse and of the same seasonal growth as adjoining vegetation.
EOG. Environmental Assessment for Spicer 3-32H and Surprise 2-05H Applications for Permits to Drill (APDs) in Jackson County. CO-120-08-42-EA. Bureau of Land Management Kremmling Field Office. 2008.	Kremmling Field Office, BLM	Reclamation will ensure surface and subsurface stability, growth of a self-regenerating permanent vegetative cover and compatibility with post land use. The vegetation will be diverse and of the same seasonal growth as adjoining vegetation.
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	Contouring, soil stabilization and preparation , and reseeding would proceed according to site-specific conditions and in compliance with XTO-committed reclamation measures in the applicant-committed design features and with BLM requirements for interim reclamation and for final reclamation of pipelines...
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	A Reclamation Status Report will be submitted to the WRFO biannually for all actions that require disturbance of surface soils on BLM-administered lands as a result of Alternative B. Actions may include, but are not limited to, well pad and road construction, construction of ancillary facilities, or power line and pipeline construction. The Reclamation Status Report will be submitted by 15 April and 15 August of each calendar year, and will include the well number, legal description, project description (e.g., well pad or pipeline), reclamation status (e.g., interim or final), whether the well pad or pipeline has been re-vegetated and/or recontoured, date seeded, photos of the reclaimed site, estimate of acres seeded and seeding method (e.g., disk-plowed, drilled, or both). Internal and external review of this plan and the process used to acquire the necessary information will be conducted annually, and new information or changes in the reporting process will be incorporated into the plan.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Disturbed areas will be seeded with a mix designed to reestablish sagebrush and forb species.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Sagebrush seed will be collected from local populations of appropriate species. Distribution will be dependent upon range site (i.e., <i>Artemisia tridentata</i> spp. <i>Vaseyana</i> and spp. <i>Wyomingensis</i> ). A mosaic of sagebrush seeded and unseeded areas is recommended. Reclamation on these sites should use seed mixes and seeding methods that include and promote successful establishment of a full complement of grasses and favored native forbs. The following forbs will be included in reclamation seed mixes as appropriate throughout sage-grouse range on lands administered by the BLM WRFO and it is recommended that these components be applied to fee-lands under ExxonMobil's control or lease: 1) scarlet globemallow, 2) Utah sweetvetch, 3) arrowleaf balsamroot, 4) Lewis flax, and 5) Rocky Mountain penstemon. (See sage-grouse seed mixes in Vegetation.)
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	The operator will be responsible for achieving a reclamation success rate for interim reclamation and final abandonment of sufficient vegetative ground cover from reclaimed plant species within three growing seasons after the application of seed. Additional reclamation efforts will be undertaken at the operator's expense if after the first growing season there are no positive indicators of successful establishment of seeded species (e.g. Germination); after the second year seeded species are not yet established (e.g. producing seed); and after the third growing season seeded vegetative communities lack persistence (e.g. reproductively capable of enduring drought conditions and sustaining the seeded community). Following the third growing season, ground cover of reclaimed seed species shall be at a Desired Plant Community (DPC) in relation to the seed mix as deemed appropriate by the BLM. Reclamation achievement will be evaluated using the Public Land Health Standards that include indicators of rangeland health. Rehabilitation efforts must be repeated if it is concluded that the success rate is below an acceptable level as determined by the BLM.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Reclamation success will be evaluated using defined performance standards. Reclamation should be monitored to evaluate the success of both interim and final reclamation efforts and determine if the techniques used are effective or if additional measures are needed.
Fidelity Exploration and Production Company. Tongue River - Badger Hills Project Plan of Development EA, Decision Record and Finding of No Significant Impact. 2004.	Miles City Field Office, BLM	The reclamation effort will be evaluated as successful if the previously disturbed area is stabilized, all potential water erosion is effectively controlled and the vegetative stand is established with at least a 70% cover when compared to similar adjacent undisturbed areas.
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	Reclamation will be determined successful when the disturbed area and any areas of subsidence are stabilized, potential water erosion is effectively controlled, the area is free of debris and the vegetative stand is established with at least a 70% ground cover and is composed of at least 60% of the required species.

Citation	Field Office	Description
Fidelity Exploration and Production Company. Tongue River - Corral Creek, Plan of Development, Environmental Assessment, Montana Board of Oil and Gas Conservation. 2008.	Miles City Field Office, BLM	The disturbed surfaces will be reclaimed in accordance with the agreements made with surface owners. The disturbed areas would be seeded with a certified seed mix agreed to by the NRCS and surface owner
Fidelity Exploration and Production Company. Coal Bed Natural Gas Tongue River – Decker Mine East Federal Project. Finding of No Significant Impact and Decision Record. Environmental Assessment MT-020-2008-345. 2008.	Miles City Field Office, BLM	Reclamation will be determined successful when the disturbed area and any areas of subsidence are stabilized, potential water erosion is effectively controlled, the area is free of debris and the vegetative stand is established with at least a 70% ground cover and is composed of at least 60% of the required species.
Fidelity Exploration & Production Company. Coal Bed Natural Gas Tongue River - Deer Creek North Federal Project. Environmental Assessment MT-020-2008-310. Finding of No Significant Impact and Decision Record, 2008.	Miles City Field Office, BLM	Reclamation will be determined successful when the disturbed area and any areas of subsidence are stabilized, potential water erosion is effectively controlled, the area is free of debris and the vegetative stand is established with at least a 70% ground cover and is composed of at least 60% of the required species.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	All reclamation will be accomplished as soon as practical after the disturbance occurs, with efforts continuing until a satisfactory revegetation cover is established. Reseeding will be accomplished by planting native species as much as practical; however, non-native species may also be used where site-specific conditions require them, or native species indigenous to the site are not commercially available, or as directed by the AO. Post-construction seeding applications will continue until determined successful by the AO.
Geokinetics. Jim Bridger Power Plant 3-D Seismic and Electromagnetic Surveys EA and Decision Record. WYW167761. WY-040-EA10-111. September 2010.	Rock Springs Field Office, BLM	Reclaim all surface disturbances using a BLM-approved seed mixture.
Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.	Casper Field Office, BLM Buffalo Field Office, BLM Miles City Field Office, BLM Lander Field Office, BLM	Construction of the Project would require approximately 3,228.1 acres; an estimated 3,178.3 acres would be reclaimed immediately following construction.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	To return habitat function as soon as possible, this decision implements a management approach that provides an incentive for rapid on-site interim and final reclamation while simultaneously allowing maximum flexibility in field development.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Within 2 miles of an active greater sage-grouse lek, interim reclamation seed mixes will be designed to provide habitat for greater sage-grouse.
Lance Oil & Gas Company. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	BLM reclamation goals emphasize eventual ecosystem reconstruction, which means returning the land to a condition approximate to an approved “Reference Site” or Natural Resources Conservation Service Ecological Site Transition State. Final reclamation measures are used to achieve this goal.
Lance Oil & Gas Company. Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.

Citation	Field Office	Description
Lance Oil & Gas Company. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. KDU Gamma Plan of Development Environmental Assessment WY-070-EA10-271, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Kinney Divide Unit Epsilon Plan of Development Environmental Assessment, WY-070-12-148, 2012.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Lance Oil & Gas Company. Sahara POD Environmental Assessment WY-070-EA13-72, 2013.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM	Should increased vehicle use occur along source lines, the BLM will require reseeding with a BLM approved seed mix and/or signage for reclamation areas.
Noble. Marys River 3D Seismic Project. DOI-BLM-NV-E030-2012-0518-EA. Elko District – Wells Field Office. August 2012.	Wells Field Office	If operations cause unplanned surface rutting or have otherwise removed all surface vegetation, the areas will be reclaimed and reseeded as directed by the landowner.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Loss of sagebrush shrublands and their reclamation success would be documented in a database.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Requires a surface disturbance, revegetation , noxious weed plan to be developed by technical agency group
QEP. Drilling of 180 Wells and Constructing or Expanding 6 Pads. WY-100-EA13-72. Approved by BLM Pinedale July 2013.	Pinedale Field Office, BLM	Reclamation practices will utilize dispersed cluster plantings, at a rate of approximately 10 clusters per acres, of container raised plantings of native shrubs not more than gallon sized germinated from a local seed source. Plant clusters should include a minimum of 30 plants per cluster. It may take additional moisture for plantings to be successful.
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	Seed all disturbed areas using a drill equipped with a depth regulator; Wyoming big sage seed is to be broadcast on top of the reclamation area after any drill seeding is completed.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	Seed all disturbed areas using a drill equipped with a depth regulator; Wyoming big sage seed is to be broadcast on top of the reclamation area after any drill seeding is completed.
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT_G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	Reclamation will be completed in accordance with the QEP, UBD Reclamation Plan on file with the Vernal Field Office of the BLM.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	Over the construction, drilling and completion season, QEP will implement an intensive interim reclamation and weed control program beginning the first growing season after each segment of project completion
Quicksilver Resources. 9 Mile 3D Seismic Project. CO-100-2008-048 EA. BLM Little Snake Field Office, 2008.	Little Snake Field Office, BLM	Proper reclamation and compliance with wildlife timing stipulations and other mitigation should help to continue meeting this standard for wildlife.

Citation	Field Office	Description
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	The operators will monitor and evaluate reclamation success and shall prepare an annual monitoring and evaluation report to be submitted to BLM and the cooperating agencies... An interagency review team will annually review and analyze the annual monitoring results and methods.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	On all areas to be reclaimed, seed mixtures will be required to be site-specific, composed of native species, and will be required to include species promoting soil stability. A predisturbance species composition list must be developed for each site if the project encompasses an area where there are several different plant communities present. Livestock palatability and wildlife habitat needs will be given consideration in seed mix formulation.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Streams, wetlands, and riparian areas disturbed during project construction will be restored to as near pre-project conditions as practical, and if impermeable soils contributed to wetland formation, soils will be compacted to reestablish impermeability.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	Approximately 26% of the well pad disturbance, 30% of new road disturbance, and 100% of pipeline disturbance will be reclaimed in accordance with BLM interim reclamation policy
Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013	Rawlins Field Office, BLM	Re-vegetation would consist of species occurring in the surrounding natural vegetation and/or included in the approved seed mix, as deemed desirable by the BLM or private surface owner in review and approval of the reclamation plan. Inter-seeding, secondary seeding, or staggered seeding may be required to accomplish re-vegetation objectives.
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Wellstar. EA for Applications for Permits to Drill (APDs) Bush Draw Federal 18-1 and 3-2 in Jackson County. DOI-BLM-CO-120-2009-0057-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	The lessee is required to use the reclamation practices necessary to reclaim all disturbed areas. Reclamation will ensure surface and subsurface stability, growth of a self-regenerating permanent vegetative cover and compatibility with post land use. The vegetation will be diverse and of the same seasonal growth as adjoining vegetation.
Wellstar. EA for Applications for Permits to Drill (APDs) Federal #9-1, Bush Draw Federal #10-2, and Bush Draw Federal #15-1 wells in Jackson County. OI-BLM-CO-120-2009-0002-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	The lessee is required to use the reclamation practices necessary to reclaim all disturbed areas. Reclamation will ensure surface and subsurface stability, growth of a self-regenerating permanent vegetative cover and compatibility with post land use. The vegetation will be diverse and of the same seasonal growth as adjoining vegetation.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Williams Production RMT Company, Cedar Draw Unit 3, WY-070-EA11-236, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
WPX Energy Rocky Mountain, LLC, Plans of Development North Butte 4, North Butte 3, J Christensen Federal 21-35 and Tex Draw Add 1, Environmental Assessment (EA), WY-070-EA12-123, 2013.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
XTO Energy. River Bend Unit Infill Development Environmental Assessment and Biological Assessment, UT-080-07-772, January 2013.	Vernal Field Office, BLM	Site preparation and reclamation activities on BLM lands would follow the Green River District Reclamation Guidelines for Reclamation Plans (BLM 2009a) and XTO Energy's Reclamation Plan for Roosevelt and Orangeville, Utah (2010).
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Vegetation canopy cover (on unforested sites), production and species diversity (including shrubs) shall approximate the surrounding undisturbed area. The vegetation shall stabilize the site and support the planned post disturbance land use, provide for natural plant community succession and development, and be capable of renewing itself.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.

Citation	Field Office	Description
Yates Petroleum Corporation. Napier Road POD Environmental Assessment WY-070-EA10-280, 2010.	Buffalo Field Office, BLM	BLM will not release the performance bond until the area has been successfully revegetated (evaluation will be made after the second complete growing season) and has met all other reclamation goals of the surface owner and surface management agency.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	To avoid permanent loss of species diversity and vegetative cover, topsoil would be stockpiled, and reclaimed areas would be seeded with site-specific mixes during appropriate planting periods, according to the committed practices detailed in Chapter 2 and the Reclamation Plan found in Appendix B
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	Minimizing disturbance areas and developing a reclamation plan that speeds recovery of habitat function
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	Reclamation activities (other than locations having a 30 day interim reclamation COA), including seeding, will take place in the fall.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	This alternative assumes that 33% of the well pad/location, 50% of well pad excess, 0% of access roads, and 100% of the pipelines and utilities would be reclaimed.
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	This alternative assumes that 33% of the well pad/location, 50% of well pad excess, 0% of access roads, and 100% of the pipelines and utilities would be reclaimed.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Reclamation assumption is 33% of the each well pad/location; 50% of well pad excess; 0% of access roads and 100% of the pipelines and utilities.



**APPENDIX D**  
**Reduce Surface Disturbance /**  
**Multi-well Pads**

**Table D-1. PECE Policy Evaluation – Reduce Surface Disturbance/Multi-well Pads**

Conservation Measure	Reduce Surface Disturbance/Multi-well Pads
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Reduce Surface Disturbance/Multi-well Pads</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Reduced surface disturbance and multi-well pad COAs and conservation measures address threats associated with Energy Development and Infrastructure under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Many documents specify surface disturbance and/or well density thresholds above which additional development is not authorized without further approval or additional mitigations. Limiting the number of wells or disturbances per section is often identified by state or federal agencies. Multi-well pads reduce total surface disturbance and fragmentation as well as noise and traffic.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include collocating facilities, using existing disturbance, and minimizing the size of well pads.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Many documents specify surface disturbance and/or well pad density thresholds above which additional development is not authorized without further approval or additional mitigations. The density of surface disturbance is commonly used as an indicator of potential impacts including in Wyoming's core area policy and BLM's RMP updates.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

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<b>Conservation Measure</b>	<b>Reduce Surface Disturbance/Multi-well Pads</b>
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

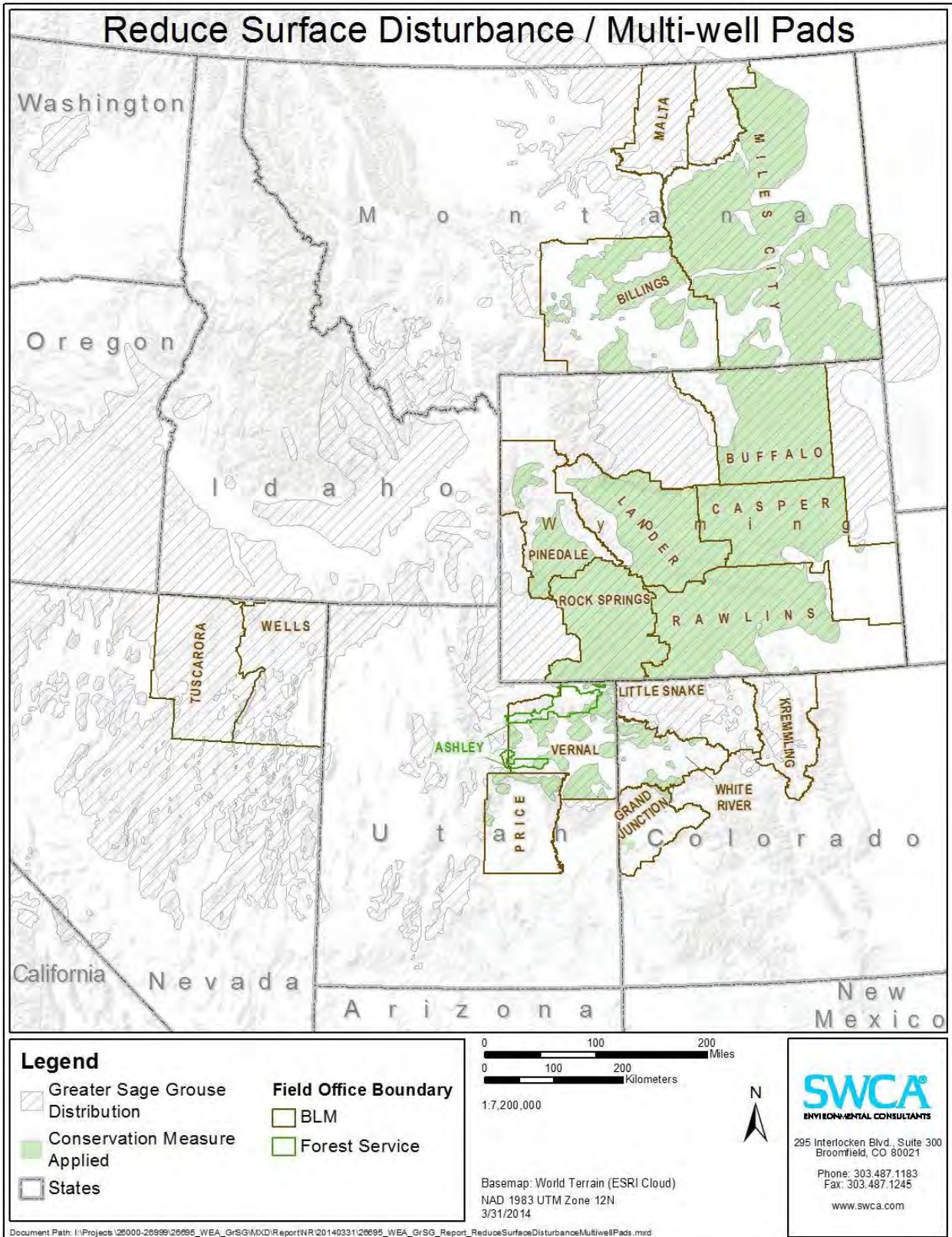


Figure D-1. Map of FOs where Reduce Surface Disturbance / Multi-well Pad COAs are applied.

**Table D-2. Reduce Surface Disturbance / Multi-well Pad COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	To minimize disturbance in sagebrush habitat, brush hogging a maximum 75' radius is authorized for all the wells. To minimize disturbance in sagebrush habitat, brush hogging and other surface disturbance is not to exceed 35' for all primitive access corridors.
Anadarko. Doty Mountain Unit B Plan of Development in Atlantic Rim EA. WY-030-08-EA-049. 2008.	Rawlins Field Office, BLM	Anadarko is committed to working with BLM and other cooperators through the Review Team to identify and reclaim approximately 1.5 miles of existing disturbed road corridors, seismic lines, or user created tracks in the Doty B POD. All restored lands once revegetated will be credited to APC and an equal amount of lands will be avoided under the disturbance cap.
Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.	Rawlins Field Office, BLM	The average short term per well disturbance is 5.3 acres, and meets the AREIS disturbance goal. The proposed action is located outside of Category A areas and is subject to a disturbance goal of 6.5 acres per well.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Surface disturbance in the ARPA is limited to 7,600 acres (2.8 percent of the project area) at any given time. Once the surface disturbance limit is reached, further development will cease until disturbed land has been reclaimed according to the reclamation standards established by the BLM for the ARPA. Operators will track surface disturbance acreage (including total disturbance and successful interim reclamation) and provide BLM with Federal Geographic Data Committee (FGDC)-compliant metadata and geographic information system/global positioning system (GIS)/(GPS) showing the "as-built" location data for all newly developed facilities and reclaimed areas annually no later than December of each year based upon successful reclamation.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	These Best Management Practices (BMPs) will be applied under all alternatives as Conditions of Approval where proposals conflict with identified resources. 1) Directional drilling...
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	These Best Management Practices (BMPs) will be applied under all alternatives as Conditions of Approval where proposals conflict with identified resources. 2) Drilling of multiple wells from a single pad.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Natural gas development is limited to eight well sites per 640-acre section. Operators can install multiple well-bores (e.g., coalbed natural gas (CBNG), conventional, or injection) on a single well site (FEIS, section 2.2.4).
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Within 4 miles of a lek, sage grouse habitat will be buffered by 0.6 mile. Within this buffer well pad construction will not exceed an average of one well pad/square mile (640 acres). This mitigation will be applied to the Project Area. Additionally, no more than 5% of sage grouse habitat is allowed to be disturbed within the Project Area. This will reduce the amount of disturbance to sage grouse and maintain the one disturbance/square mile threshold.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Production facilities will be consolidated when possible, to reduce disturbance from traffic, habitat fragmentation, and total surface area impacts.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	The Selected Alternative limits surface development to a maximum of 162 well pads; a maximum of 356 new wells will be drilled.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	The Anthro Mountain telemetry study has shown that sage-grouse may be using openings in pinyon/juniper during migration events. Therefore within 4 miles of a lek, in openings of the pinyon/juniper (chained or natural openings in pinyon/juniper belt), well pads should be located as close to the edge of the opening as possible.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	As described in Alternative E – Agency Preferred Alternative of the WTP Final EIS, within the winter core-use sage-grouse habitat 41 well pads. Under the Selected Alternative, there will seven new well pads and 13 re-occupied well pads. Increased directional drilling within winter core-use sage-grouse habitat will also result in less fragmentation from linear disturbance features (i.e., roads and pipelines to individual well locations).
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Included in the special protection measures for wildlife, is a requirement that BBC and other operators must realign existing roads within core sage-grouse winter habitat, thereby reducing fragmentation (see ROD Figure 1) within 1 year of signing this ROD. Strategic planning will be completed in cooperation with the UDWR to determine appropriate locations for road realignments.

Citation	Field Office	Description
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	626 wells and 120 well pads (63 new pads and 57 re-occupied).
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Develop offsite mitigation strategies in situations where fragmentation or degradation of Special Status Species habitat is unavoidable.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM Rock Springs Field Office, BLM	Chevron proposes to minimize surface disturbance by utilizing existing well pads by co-locating new wells with existing wells or by establishing multi-well pads throughout the project area to the greatest extent possible.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Due to sagebrush habitat and reclamation concerns mowing for the access/utility corridor will not exceed 15 feet in width.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	The construction of Catalina POD G&I wells in combination with other approved or existing wells within the analysis area would result in 3.32 wells per square mile.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	The Wyoming Sage-grouse Core Area concept (WGFD 2011a) and the Wyoming BLM Instructional Memorandum for Greater Sage-grouse Habitat Management Policy (WY-2012-019) provides habitat protection to leks within the identified Core Areas and increased mitigation flexibility relative to non-Core Area leks and associated seasonal habitats. This BLM IM generally mirrors, and expands on, the protections provided by the Wyoming Core Area concept. The Lander Field Office GIS staff ran the required project specific Density Disturbance Calculation Tool (DDCT, WGFD 2012) exercise. As discussed above, the DDCT analysis demonstrates that the existing density of oil and gas wells and the disturbance of habitat from the existing and proposed projects are within the limits provided in the DDCT and BLM IM WY-2102-019 and will not cause declines in Greater Sage-Grouse populations.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	One centralized production, separation and CO2 re-pressurization facility is anticipated. This will be constructed at the site of the existing Grieve Unit central facility in an effort to minimize surface disturbance.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Multi-well pads will be prepared by clearing an area approximately 325 feet by 200 feet; an average pad disturbance is estimated at 3.3 acres, including cut-and-fill, per pad. Single well pads will measure 325 X 175 feet, resulting in approximately 3.0 acres per site.
EnCana Oil and Gas. 16 APDs on existing well pad P28-496. DOI-BLM-CO-110-2011-0153-CX. Approved 9/6/11 by White River Field Office.	White River Field Office, BLM	The proposal includes drilling 16 additional wells on the existing P28 496 well pad (for a total of 32 wells). No additional acreage is required to expand the existing well pad.
EnCana Oil and Gas. 16 gas wells on existing well pad (N22 496). DOI-BLM-CO-110-2012-0004-CX. Approved 12/8/11 by White River Field Office.	White River Field Office, BLM	The proposal includes drilling 16 additional wells on the existing SG N22 496 well pad (for a total of 32 wells). No additional acreage is required to expand the existing well pad.
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	28 wells on one new well pad. The well pad is proposed to have working surface dimensions of 778 feet long by 302 feet wide for total well pad surface disturbance of 9.7 acres. Following interim reclamation 2.2 acres will be needed for production.
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	2 new well pads (20.4 acres initial disturbance total) with 16 wells each. An EnCana initiative, and one endorsed by CDOW and WRFO, the development designs for multi-well pads and centralized production facilities in the valley bottoms were undertaken specifically as a means to avoid habitat and behavioral impacts to sage-grouse.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant is using modern fracing and drilling technologies that reduce surface density of development features.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant volunteered to a wholesale redesign of original drilling patterns that used existing pads (E34/L27) or pads in non-habitat (F22) that allowed for retention of the largest remaining parcel of sagebrush habitat in the immediate project area and eliminated the need to develop additional pad locations on two adjacent, occupied ridgelines (including Barnes Ridge itself); the applicant's development redesign confined the behavioral influences of human activity to areas of pre-existing disturbance and dramatically reduced the need for initiating surface disturbance in largely undisturbed suitable and occupied habitat.

Citation	Field Office	Description
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The operator's development designs for multi-well pads and centralized production facilities were undertaken specifically as a means to reduce habitat loss and the scope of behavioral impacts imposed on sage-grouse. This development plan was formulated in part from a series of prior discussions and on-sites and its implementation was endorsed by CPW and WRFO staff.
EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.	White River Field Office, BLM	16 to 28 wells on one well pad that is 8.7 acres
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	16 additional wells on 2 existing well pads each
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office	Up to 93 new wells from up to 24 new well pads and one existing well pad.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	18 well pads with a range of 18 to 72 wells, assuming one to four wells per well pad/location. Average disturbance per well (assuming one to four wells per pad/ location) would be a range of 4.21 to 1.05 acres, respectively.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	If an APD were submitted within the north Glenrock Thunderbasin core area, a density disturbance calculation tool (DDCT) would be prepared and submitted to the WGFD for review, in compliance with BLM Wyoming Instruction Memorandum (WY-IM-2012-019).
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	37 well pads with a range of 37 to 148 wells, assuming 1 to 4 wells per pad/location. Average disturbance per well pad/location (assuming 1 to 4 wells per well pad/location) is 4.21 acres.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	56 well pads/ locations with a range of 56 to 224 wells, assuming one to four wells per well pad/location. Average disturbance per well (assuming one to four wells per well pad/location) is a range of 4.21 - 1.05 acres.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	If an APD is submitted within the North Glenrock Core Area, a density disturbance calculation tool (DDCT) will be prepared and submitted to the Wyoming Game and Fish Department for review, for compliance with BLM Wyoming Instruction Memorandum (WY-IM-2012-019).
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	Reduce the number of well pads required in a section by drilling multi-lateral, multi-formation wells from a single well pad. Project proposed 40 wells on 13 pads, with 2 to 4 wells per pad.
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	120 natural gas wells on 6 well pads resulting in an initial 192.5 acres of surface disturbance including pipelines and roads.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	up to 1,080 wells—as many as 120 well pads with up to nine well bores each
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	There are several sage grouse and sharp-tail leks within the project area boundary; however, the project has been designed to avoid the leks with surfacing disturbing activities. In addition, the entire POD is considered grouse nesting habitat.
Fidelity Exploration and Production Company. Tongue River - Corral Creek, Plan of Development, Environmental Assessment, Montana Board of Oil and Gas Conservation. 2008.	Miles City Field Office, BLM	Wells, roads, and batteries will be located to avoid disturbing sage grouse, sharp-tailed grouse, and mountain plover nesting sites in the project.
Fidelity Exploration and Production Company. Tongue River - Badger Hills Project Plan of Development EA, Decision Record and Finding of No Significant Impact. 2004.	Miles City Field Office, BLM	up to 85 federal coal bed natural gas wells on 18 locations and one linear right-of-way for buried flowlines and power line
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	up to 132 federal coal bed natural gas wells on 27 well sites



Citation	Field Office	Description
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	Proposal for up to 1,298 new gas production wells from up to 575 pads.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	No surface disturbance will be permitted in riparian or wetland areas.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	Well pad surface density will be no more than one pad per approximately 160 acres.
Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.	Buffalo Field Office, BLM Casper Field Office, BLM Lander Field Office, BLM Miles City Field Office, BLM	Maximum Allowed Disturbance in Greater Sage-grouse Habitat is 5%, but projected cumulative disturbance within Core Areas is 2.66%. Meets WY IM 2010-012 Requirements.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators would avoid optimal greater sage-grouse nesting habitats, where practical. Optimal nesting habitat is defined as areas with sagebrush heights of 20–31 inches and cover of 15–25% and an understory (grasses and forbs) cover of >15%.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators would utilize directional drilling to access resources beneath the 0.25-mile active greater sage-grouse lek buffers if reserves beneath these locations are deemed economic. Operators would utilize directional drilling to access resources beneath the 600-foot wide (or tall sagebrush-dominated) buffer associated with the Sand Draw protection areas if deemed economic.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Of the 3,675 new wellbores, approximately 1,484 will be vertically drilled on new well pads and approximately 634 Mesaverde-only completions will be drilled as deepened recompletions or twinned wells on existing well pads. The remaining 1,557 wellbores will be directionally drilled from new and existing well pads.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	The Selected Alternative was designed to utilize directional drilling within the GNBPA to reduce surface impacts relative to the Proposed Action to a maximum of 1 pad per 40 acres (maximum of 16 well pads per section).
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	As directed by the AO, mats will be used during drilling and other development activities to reduce disturbance impacts to underlying soils.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	KMG will utilize shared well pads to the extent possible, in consideration of technical, environmental, and economic viability, to minimize the amount of total surface disturbance in the Greater Natural Buttes Project Area (GNBPA). Each new produced water disposal well will be located on existing production locations. KMG will evaluate deepening existing wells to accomplish Mesaverde-only completions before twinning an existing well. KMG will strive to continually improve the development processes in order to minimize the surface impact where practical. KMG will carefully evaluate drilling multiple wells from a single pad on an ongoing basis and has included the potential to use multiple wells from a shared pad in the GNBPA to the extent that KMG determines technically and economically viable.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Mats will be utilized where feasible, instead of traditional pad construction, to minimize the disturbance to greater sage-grouse habitat.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Prior to siting new well pads or locating new access roads between 0.5 and 2.0 miles of a greater sage-grouse lek, habitat mapping (using available soils and vegetation data, 2009 National Agriculture Imagery Program imagery, and field verification) to determine areas of suitable greater sage-grouse habitat will be conducted with coordination between KMG, the BLM, and the Utah Division of Wildlife Resources. Once these data are available, they will be used to identify non-greater sage-grouse habitat, or the lowest quality greater sage-grouse habitat, to determine a surface development pattern that may be least impacting to greater sage-grouse and may allow a viable population of greater sage-grouse to continue to persist in the East Bench area until total reclamation has been achieved.

Citation	Field Office	Description
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	LOG proposed slot location where safe and feasible to reduce acres of disturbance
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Most of the proposed wells are located near or within existing roads to reduce fragmentation to sage brush patch size
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will locate impoundments to avoid sagebrush shrublands, where practical.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will locate impoundments to avoid sagebrush shrublands, where practical.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The operator will limit vegetation removal and the degree of surface disturbance wherever possible. Where surface disturbance cannot be avoided, all practicable measures will be utilized to minimize erosion and stabilize disturbed soils.
QEP. Drilling of 180 Wells and Constructing or Expanding 6 Pads. WY-100-EA13-72. Approved by BLM Pinedale July 2013.	Pinedale Field Office, BLM	24-40 wells per pad with proposed extension of existing pads.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	20 wells on one pad
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	13 wells on one pad
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	QEP has committed to twin 216 wells and directionally drill 132 wells on/from other well pads.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	4,399 wells from no more than 600 well pads
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	In development area MA-5 A maximum of two well pads per section will be allowed. A maximum of 40 acres of surface disturbance per section will be allowed (6.25% disturbance). Similar protections to sage-grouse core area.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	In development area MA-6 A maximum of one well pad per section will be allowed. A maximum of 40 acres of surface disturbance per section will be allowed. Similar to protection afforded by core areas.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Development of 37,019 acres within 2 miles of greater sage-grouse leks was suspended for 5 years. After the 5-year period, an individual lease or Multiple leases under federal suspension and/or term NSO will be considered for conversion to “available for development” when a comparable acreage in the core area (not needed for production operations) has been returned to functioning habitat through the completion of all development operations and successful reclamation of all portions of the well pads within the comparable area.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	The entire PAPA will be developed with no more than 600 well pads on all lands in the PAPA. Throughout the PAPA no more than one well pad per quarter section (160 acres) is authorized, per Operator. Where existing development already exceeds this limit, no additional pads will be authorized.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	40 well pads with 2 to 6 wells and a maximum of 150 wells. The average per well disturbance would initially be 4.6 acres, including roads and pipelines, assuming 150 wells are drilled.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	In order to protect potential greater sage-grouse habitat, disturbance in sagebrush vegetation types will be minimized.

Citation	Field Office	Description
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	During onsite visits, the SGR and BLM adjusted the location of 9 wells and one section of overhead power lines to reduce direct loss and fragmentation of sage-grouse habitat
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	Due to dense sagebrush habitat at the 41-22 and 42-28 locations, the working area around the well site will be mowed no greater than 120 x 180 feet.
XTO Energy. River Bend Unit Infill Development Environmental Assessment and Biological Assessment, UT-080-07-772, January 2013.	Vernal Field Office, BLM	484 additional wells, of which, 410 would be directionally drilled from new and existing well pads
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	At the onsite BLM required minimization of disturbance corridors through sagebrush. Brush hogging/mowing will be limited to a 35' radius around wells and 30' width on the access roads and corridors
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	The operator will limit vegetation removal and the degree of surface disturbance wherever possible. Where surface disturbance cannot be avoided, all practicable measures will be utilized to minimize erosion and stabilize disturbed soils.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	The selected alternative incorporates components of the Wyoming Governor's Sage Grouse Implementation Team's "core population area" strategy and executive order and local research to provide appropriate protections for sage-grouse, while meeting the purpose and need for the Lazurite Project.

**APPENDIX E**  
**Dust Suppression**

**Table E-1. PECE Policy Evaluation – Dust Suppression**

Conservation Measure	Dust Suppression
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

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<b>Conservation Measure</b>	<b>Dust Suppression</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Dust suppression COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Dust suppression is tracked as part of air quality monitoring efforts for each project.
The steps necessary to implement the conservation effort are identified in detail.	NEPA documents identify steps to take to reduce or eliminate fugitive dust emissions.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	State and federal standards for dust emissions are generally present and enforced and can be reliably measured.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

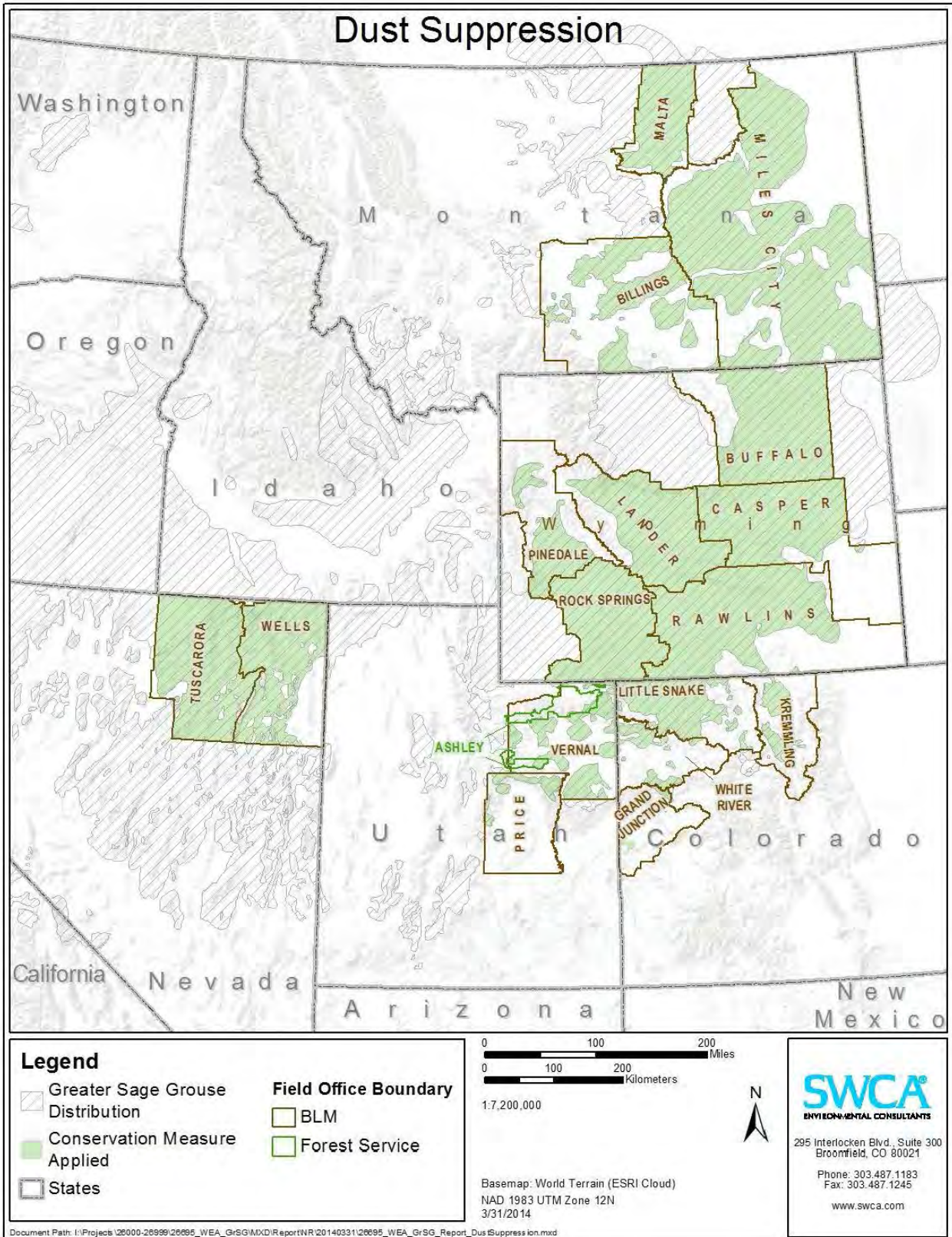


Figure E-1. Map of FOs where Dust Suppression COAs are applied.

**Table M-2. Dust Suppression COAs and Conservation Measures**

Citation	Field Office	Description
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Operators may use water for dust abatement on a case-by-case basis. The water should meet state standards for this use and be permitted by the state of Wyoming.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Reduce fugitive dust from roads by observing speed limits and applying water as needed.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	As part of the monitoring plan, a third-party contractor will collect dust samples to determine if dust, generated by industrial traffic, is still being deposited on sites. If the BLM determines that dust is continuing to accumulate on sites, the BLM will mitigate the impacts
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Operators on federal leases will be required to post and enforce speed limits to reduce fugitive dust emissions. Dust inhibitors will be used as necessary on unpaved collector, local and resource roads to reduce fugitive dust emissions to the air and resources adjacent to the road.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM Rock Springs Field Office, BLM	Other environmental protection measures required by the BLM include the following: Dust abatement to minimize potential adverse effects from increased road use.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	The production of dust will be significantly reduced through accepted dust abatement techniques. Techniques include, but are not limited to, the seeding of all disturbed areas that are not utilized during the well production phase (i.e. borrow ditches and topsoil and spoil piles) and the application of water to roadways during dry periods.
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	Dust will be controlled on the roads and locations during construction and drilling by periodic watering of the roads and locations.
EnCana Oil and Gas. Master Development Plan for the SG E34 496, SG L796 and SG F22 496, Environmental Assessment and Decision Record, DOI-BLM-CO-2013-0035-EA, 2013.	White River Field Office, BLM	EnCana will treat all access roads with water and/or a chemical dust suppressant during construction and drilling activities so that there is not a visible dust trail behind vehicles. Any technique other than the use of freshwater as a dust suppressant on BLM lands will require prior written approval from BLM.
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	The operator shall implement dust abatement measures as needed to prevent fugitive dust from vehicular traffic, equipment operations, or wind events.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Fugitive dust would be abated immediately by applying water, chemical dust suppressants, or other means when air quality is impaired, soil is lost, or the BLM, WDEQ-AQD, or EnCana identifies safety concerns.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Watering dirt roads during periods of high use to reduce fugitive dust emissions;
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	The BLM would approve the procedure (e.g., application of water and magnesium chloride) for dust abatement at facility construction sites as well as locations for use and application rates.
Fidelity Exploration & Production Company. Coal Bed Natural Gas Tongue River - Deer Creek North Federal Project. Environmental Assessment MT-020-2008-310. Finding of No Significant Impact and Decision Record, 2008.	Miles City Field Office, BLM	Water or other non-saline dust suppressants with at least 50 percent control efficiency must be applied during well site, battery site and road construction. Dust inhibitors (surfacing materials, non-saline dust suppressants and water) must be used as necessary on unpaved roads that present a fugitive dust problem. The use of chemical dust suppressants on public surface will require prior approval from the BLM Authorized Officer.



Citation	Field Office	Description
Fidelity Exploration and Production Company. Coal Bed Natural Gas Tongue River – Decker Mine East Federal Project. Finding of No Significant Impact and Decision Record. Environmental Assessment MT-020-2008-345. 2008.	Miles City Field Office, BLM	Water or other non-saline dust suppressants with at least 50 percent control efficiency must be applied during well site, battery site and road construction. Dust inhibitors (surfacing materials, non-saline dust suppressants and water) must be used as necessary on unpaved roads that present a fugitive dust problem. The use of chemical dust suppressants on public surface will require prior approval from the BLM Authorized Officer.
Fidelity Exploration and Production Company. Tongue River - Badger Hills Project Plan of Development EA, Decision Record and Finding of No Significant Impact. 2004.	Miles City Field Office, BLM	Water or other non-saline dust suppressants with at least 50 percent control efficiency must be applied during well site, battery site and road construction. Dust inhibitors (surfacing materials, non-saline dust suppressants and water) must be used as necessary on unpaved roads that present a fugitive dust problem. The use of chemical dust suppressants on public surface will require prior approval from the BLM Authorized Officer.
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	Water or other non-saline dust suppressants with at least 50 percent control efficiency must be applied during well site, battery site and road construction. Dust inhibitors (surfacing materials, non-saline dust suppressants and water) must be used as necessary on unpaved roads that present a fugitive dust problem. The use of chemical dust suppressants on public surface will require prior approval from the BLM Authorized Officer.
Fidelity Exploration and Production Company. Tongue River - Corral Creek, Plan of Development, Environmental Assessment, Montana Board of Oil and Gas Conservation. 2008.	Miles City Field Office, BLM	Mitigation proposed by the operator includes implementation of speed limits on unpaved roads to reduce dust emissions
Gulfport Energy Corporation/Quicksilver Corporation. Craig Dome/Bell Rock 3D Seismic Survey. DOI-BLM-CO-N010-2011-0006 EA. Little Snake Field Office, 2011.	Little Snake Field Office, BLM	BLM-approved dust control measures would be applied as necessary on BLM roads.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators will continue to encourage limiting the speed of all vehicles operated by the leaseholder, Operator, or Operator agents in the JIDPA, and will implement voluntary fugitive dust control measures on primary access roads and heavily used resource roads.
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM	In order to reduce fugitive dust, posted speed limits will be obeyed and Noble will instruct personnel not to exceed 30 miles per hour on all dirt roads with no posted speed limits. Noble will use water trucks, where necessary, to control fugitive dust.
Noble. Marys River 3D Seismic Project. DOI-BLM-NV-E030-2012-0518-EA. Elko District – Wells Field Office. August 2012.	Wells Field Office, BLM	Noble shall use water trucks, where necessary, to control fugitive dust.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will use gravel, water, or other dust suppressors, as needed, to reduce dust associated with facility access roads. Companies will contact the counties to ascertain the procedures to be followed.
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT_G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	Water or other approved dust suppressants would be used at construction sites along roads, as determined appropriate by the AO.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	In accordance with Wyoming Air Quality Standards and Regulations Chapter 3, Section 2(f), the emission of fugitive dust will be limited by all persons handling, transporting, or storing any material to prevent unnecessary amounts of particulate matter from becoming airborne to the extent that ambient air standards described in these regulations are exceeded.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	If a fugitive dust problem is identified as a result of the increased traffic related to the Proposed Action, immediate abatement measures (e.g., applications of water or chemical dust suppressants to disturbed surfaces) would be initiated in consultation with the BLM and WDEQ to avoid excessive dust on gravel roads.
Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013	Rawlins Field Office, BLM	Emissions of particulate matter from well pad, road, and other facility construction, operation, and reclamation activities will be minimized by application of water or other dust suppressants.

Citation	Field Office	Description
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
EOG. EA for 4 Applications for Permit to Drill (APDs & ROWs) in Jackson County. DOI-BLM-CO-120-2009-0003. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	The project proponent is planning on using water to control emissions when necessary.
Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office, Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Anadarko Petroleum Corporation, Dry Willow Phase V POD EA, WY-070-10-186, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Coleman Oil & Gas. Wilkinson POD. EA # WY-070-11-38. 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Devon Energy Company, L.P., Grayling POD EA, WY-070-10-332, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Kinney Divide Unit Epsilon Plan of Development Environmental Assessment, WY-070-12-148, 2012.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. KDU Gamma POD Environmental Assessment WY-070-EA10-271, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.

Citation	Field Office	Description
Lance Oil & Gas Company. Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Lance Oil & Gas Company. Sahara POD Environmental Assessment WY-070-EA13-72	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Williams Production RMT Company, Cedar Draw Unit 3, WY-070-EA11-236, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
WPX Energy Rocky Mountain, LLC, POD North Butte 4, North Butte 3, J Christensen Federal 21-35 and Tex Draw Add 1, Environmental Assessment (EA), WY-070-EA12-123, 2013.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.
Yates Petroleum Corporation. Napier Road POD Environmental Assessment WY-070-EA10-280, 2010.	Buffalo Field Office, BLM	During construction, emissions of particulate matter from well pad and road construction would be minimized by application of water or other non-saline dust suppressants.

**APPENDIX F**  
**No Surface Occupancy**

**Table F-1. PECE Policy Evaluation – No Surface Occupancy**

Conservation Measure	No Surface Occupancy
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>No Surface Occupancy</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	No Surface Occupancy COAs and conservation measures address threats associated with Energy Development and Infrastructure under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	No Surface Occupancy restrictions are implemented year-round for the life of the project.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include avoidance of activities and new infrastructure surrounding leks within given distance buffers.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Lek attendance monitoring, monitoring of nesting and brood-rearing hens, etc. provide quantifiable parameters to measure success of the measure. Multiple sources identify that avoidance of activities surrounding leks during lekking, nesting, and early brood-rearing periods provide conservation benefit and protective measures for sage-grouse.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual lek counts are tracked by state game and fish agencies and federal land management agencies for purposes of evaluating grouse populations. Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

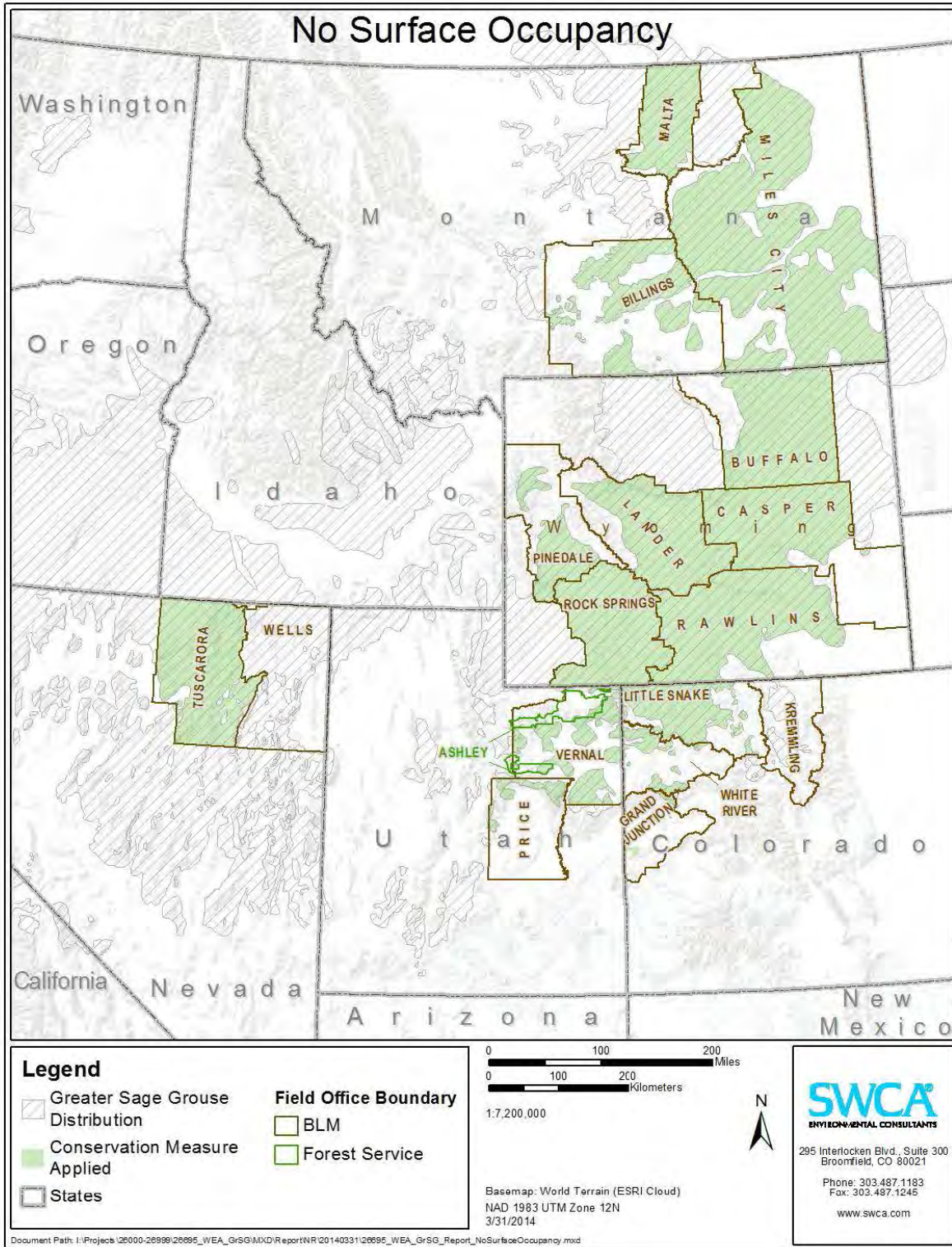


Figure F-1. Map of FOs where No Surface Occupancy COAs are applied.

**Table F-2. No Surface Occupancy COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko. Doty Mountain Plan of Development D in Atlantic Rim. DOI-BLM-WY-030-2012-0093-EA. 2012.	Rawlins Field Office, BLM	0.25 mile lek no surface occupancy restriction.
Anadarko. Doty Mountain POD C in Atlantic Rim EA. WY-030-07-EA-240. 2008.	Rawlins Field Office, BLM	Numerous well pads, roads, and corridors were relocated so that all were located outside the established 0.25 mile Controlled Surface Use (CSU) area for the lek.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Avoidance areas for surface-disturbing and disruptive activities and linear crossings include the following (FEIS appendix H): Identified 100-year floodplains; Areas within 500 feet from perennial waters, springs, water wells, and wetland riparian areas, and Areas 100 feet from the inner gorge of ephemeral channels.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Surface disturbance or occupancy will be prohibited within one-quarter mile of the perimeter of occupied leks.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	A minimum distance of 100 feet will be maintained between surface disturbing activity and springs or seeps, as measured from the outer edge of their associated wetland/riparian vegetation.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	In the case of intermittent and ephemeral drainages, a minimum distance of 50 feet will be maintained between facilities (such as well pads, tank batteries, and compressor stations) and the active channel and cutbanks of adjacent vertical terraces. For priority watersheds, classified as impaired by the Utah Division of Water Quality, siting of facilities within 100 feet of intermittent/ephemeral channels will be avoided where feasible; and where it occurs, would be subject to more rigorous monitoring and implementation of erosion control measures.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	In the case of perennial streams (i.e. Sowers Creek), facilities such as well pads, tank batteries, and compressor stations will be located outside the 100-year floodplain or a distance of 150 feet from the high water line, whichever is greater (as per INFISH recommendations for non-fish-bearing perennial streams).
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	To reduce potential disturbance to strutting birds (and the likelihood of lek abandonment), nesting birds, and habitat, no well pads or permanent structures will be allowed within 0.6 mile of an occupied lek. This measure would distance structures away from leks that raptors may use for perching.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	In accordance with the Price Field Office Record of Decision and Approved Resource Management Plan (Approved RMP) construction, drilling, or completion activities will be precluded within two miles of known leks (or new leks which may be located during the life of the project (LOP)) between March 15 and July 15. In addition, regardless of season, development will be precluded from within ½ mile of known leks.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	No surface disturbance will be authorized in core winter use areas (during any time of the year) until the operator submits a site-specific plan of development for proposed roads, wells, pipelines, and/or other project features that will be constructed within those areas.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	In order to minimize impacts to sharptail and sage grouse leks, surface occupancy within ¼ mile of known leks is prohibited. The measure may be waived if the AO, in coordination with MFWP, determines that the entire leasehold can be occupied without adversely affecting grouse lek sites, or if all lek sites within ¼ mile of the leasehold have not been attended for 5 consecutive years.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	Natural gas and helium pipelines shall be re-located outside of the ¼-mile radius around the perimeter of an occupied Greater sage-grouse lek.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	No Surface Occupancy is allowed within the ¼-mile radius around the perimeter of an occupied Greater sage-grouse lek.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	0.25 mile lek no surface occupancy restriction.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Construction of well sites and other non-linear features within 500 feet of surface water and/or riparian areas or within 100 feet of the inner gorge of ephemeral channels will be prohibited.



Citation	Field Office	Description
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Surface occupancy and/or disruptive activities are prohibited on or within a six tenths (0.6) mile radius of the perimeter of occupied sage-grouse leks.
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	This lease has both NSO and CSU stipulations for riparian and wetland zones... activities may require special design, construction, and implementation measures within 500 feet of the outer edge of riparian or wetland vegetation.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	A "Restricted Surface Occupancy" buffer would be applied to all forms of new disturbance that would alter the vegetative structure or topography or would result in the addition of surface structures.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	A 0.6 mile "Restricted Surface Occupancy" buffer would be applied for active lek sites. A "Restricted Surface Occupancy" buffer would be applied to all forms of new disturbance that would alter the vegetative structure or topography or would result in the addition of surface structures. The BLM would be notified of any new disturbance within the "Restricted Surface Occupancy" buffer.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	A 0.6-mile buffer zone would be established around known leks, and all construction and surface occupancy not be allowed within this buffer zone.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Project sites would be evaluated for the occurrence and distribution of special aquatic sites, including riparian areas and playas. Project facilities would not be allowed within 500 feet of these wetland areas. As of July, 2008 project sites have been evaluated and one well site was moved out of a riparian area.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface-disturbing activities are prohibited within one ¼- mile radius of occupied sage-grouse leks.
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing activities are prohibited within one quarter (0.25) mile radius of occupied sage-grouse leks.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Surface disturbing activities are prohibited within one quarter (0.25) mile radius of occupied sage-grouse leks.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	The proposed schedule commences in May with survey activities. If the schedule were to change for some reason, timing restrictions would be imposed within 0.6 mi of active and inactive (i.e. leks used within the last 5 years) sage-grouse leks from March 15 through May 7 in order to minimize disturbance to breeding grouse.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Prohibit surface disturbance within 1/4 mile of Greater sage-grouse leks unless they are considered historic (have not been used in the past 7–10 years).
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Prohibit surface disturbance within identified patches of Greater sage-grouse severe winter habitat.
Fidelity Exploration and Production Company. Tongue River - Corral Creek, Plan of Development, Environmental Assessment, Montana Board of Oil and Gas Conservation. 2008.	Miles City Field Office, BLM	The operator also agrees to avoid construction or drilling activities within a quarter-mile of sage grouse or sharp tail grouse leks during the nesting season to protect these species from noise disturbance during this critical period. It is understood that new information regarding grouse set back distances maybe come available in the near future and recommendation from the applicable grouse working groups will be reviewed and considered during development.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	New surface-disturbing activities within public water reserves, or within 330 feet of riparian areas, will be avoided unless 1) there are no practical alternatives; 2) impacts could be fully mitigated; or 3) the action is designed to enhance the riparian resources. A buffer strip of vegetation will be maintained between areas of surface disturbance and riparian vegetation. Silt fencing or other erosion control measures will be installed and maintained between areas of surface disturbance and riparian vegetation to protect against erosion or contamination.

Citation	Field Office	Description
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	No permanent facilities will be constructed within 2 miles of active strutting grounds, when possible.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	On BLM land, new construction and surface-disturbing activities will be avoided year-round within 0.25 mile of active or historic greater sage-grouse strutting grounds (leks).
Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.	Buffalo Field Office, BLM Casper Field Office, BLM Lander Field Office, BLM Miles City Field Office, BLM	To avoid potential impacts to breeding greater sage-grouse, Greencore would implement a permanent 0.6 mile No Surface Occupancy (NSO) buffer around occupied leks in Core Areas and a 0.25 mile NSO lek buffer in Non-core Areas. Any site specific modifications to NSO buffers would require authorization by the BLM.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Compressor stations will be sited at least 2.0 miles away from greater sage-grouse leks and no closer than 0.5 mile to an active raptor nest.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Surface disturbance and occupancy will be prohibited within 0.25 mile of the perimeter of greater sage-grouse leks, and human activity in these areas will be avoided between 8 p.m. and 8 a.m. from March 1 through May 15.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	To further mitigate potential adverse effects to breeding and nesting greater sage-grouse on the JIDPA, 0.5-mile facility-free buffers would be applied to greater sage-grouse lek 7 south of the JIDPA for as long as Operators continue to hold the leases for these areas. No features requiring repeated human presence would be built within this area.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	No surface disturbing activities will be allowed within 0.5 mile of active greater sage-grouse leks year round.
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	The Operator, in their POD, has committed to remove one well and a water impoundment from the project proposal which were located within a 0.25 mile buffer of a sage-grouse lek
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	Surface disturbing activities or surface occupancy is prohibited or restricted on or within one quarter (0.25) mile radius of the perimeter of occupied or undetermined sage-grouse lek.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	No occupancy or other surface disturbance will be allowed within a 1,320-foot radius of the center of a sage grouse strutting ground (lek). No exceptions will be granted.
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	If an active lek is identified and construction has not been completed, surface disturbance and occupancy within 0.25 miles of the center of the lek will be prohibited.
Noble Energy. Huntington Valley Proposed Oil & Gas Development. DRAFT. In progress January 2014.	Tuscarora Field Office, BLM	This lease contains lands which have been identified as sage grouse strutting grounds (leks) that are subject to seasonal protection from disturbance. No Surface Occupancy is permitted within 0.5 miles, or other, lesser, appropriate distance based on site-specific conditions, of sage grouse leks.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	No permanent facilities will be allowed within 1,000 feet of any identified greater sage grouse strutting ground.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	QEP would avoid placement of roads, pipelines, well pads, and ancillary facilities within 100 meters of riparian habitats. If avoidance is not feasible, then effects to riparian habitats would be minimized where possible.
Quicksilver Resources. 9 Mile 3D Seismic Project. CO-100-2008-048 EA. BLM Little Snake Field Office, 2008.	Little Snake Field Office, BLM	A buffer of 330 feet shall be maintained between vehicles and wetlands, springs, and riparian zones unless on existing roads.
Quicksilver Resources. 9 Mile 3D Seismic Project. CO-100-2008-048 EA. BLM Little Snake Field Office, 2008.	Little Snake Field Office, BLM	No surface occupancy will occur within ¼ mile radius of leks. The NSO area may be modified by a BLM biologist depending on activity status and presence of topographical or vegetative barriers.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	All surface disturbance, permanent facilities, etc., will remain a minimum of 500 feet away from the edge of surface waters, riparian areas, wetlands, and 100-year floodplains unless it is determined through site specific analysis...
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Surface disturbance within 0.25 mile of an occupied greater sage-grouse lek will be avoided.

Citation	Field Office	Description
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	Ensure that construction, drilling, and completion activities are minimized in riparian corridors, and ensure that well pads are located at least 500 feet from any riparian area. Any roads or pipelines that cannot be re-routed should cross riparian zones in a manner that would minimize disturbance.
Samson Resources Company. Environmental Assessment for the Scott Field Development Project. WY-060-EA13-067. Approved 9/9/13 by the BLM Casper Field Office.	Casper Field Office, BLM	In the event that a new lek is discovered, surface disturbance and/or occupancy will be avoided within 0.25 mile of the perimeter of an occupied lek to protect breeding habitat.
Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013	Rawlins Field Office, BLM	Avoid activities within identified 100-year flood plain, within 500 feet of perennial waters, springs, wells, and wetlands, and areas within 100 feet of the inner gorge of ephemeral channels where amphibians may be present.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	No surface occupancy within one-quarter mile of active sage-grouse leks, although the GRRMP also provides that some activities may be granted exceptions to this restriction, under certain circumstances.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	Surface disturbing activity is restricted on or within a 0.25 mile radius of the perimeter of occupied or undetermined sage-grouse leks.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	If an active lek is identified and construction has not been completed, surface disturbance and occupancy within 0.25 miles of the center of the lek will be prohibited.

**APPENDIX G**  
**Noxious/Invasive Weed Management**

**Table G-1. PECE Policy Evaluation – Noxious/Invasive Weed Management**

Conservation Measure	Noxious/Invasive Weed Management
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

<b>Conservation Measure</b>	<b>Noxious/Invasive Weed Management</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Noxious weed COAs and conservation measures address threats associated with Energy Development and Invasive Plants under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Weed Management Plans and Reclamation Plans contain incremental objectives, such as staying below a certain percent cover of weeds after a set number of growing seasons.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified in COAs and Weed Management/Reclamation Plans, including implementation measures that describe soil preparation and seed mixes to use during reclamation, and weed control methods.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Reclamation must meet quantifiable standards to be considered successful, including maintaining weeds below a set percent coverage.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual monitoring and reporting are a part of weed management COAs. If weeds are not reaching the set success criteria, adaptive management allows the weed control approach to be re-evaluated.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

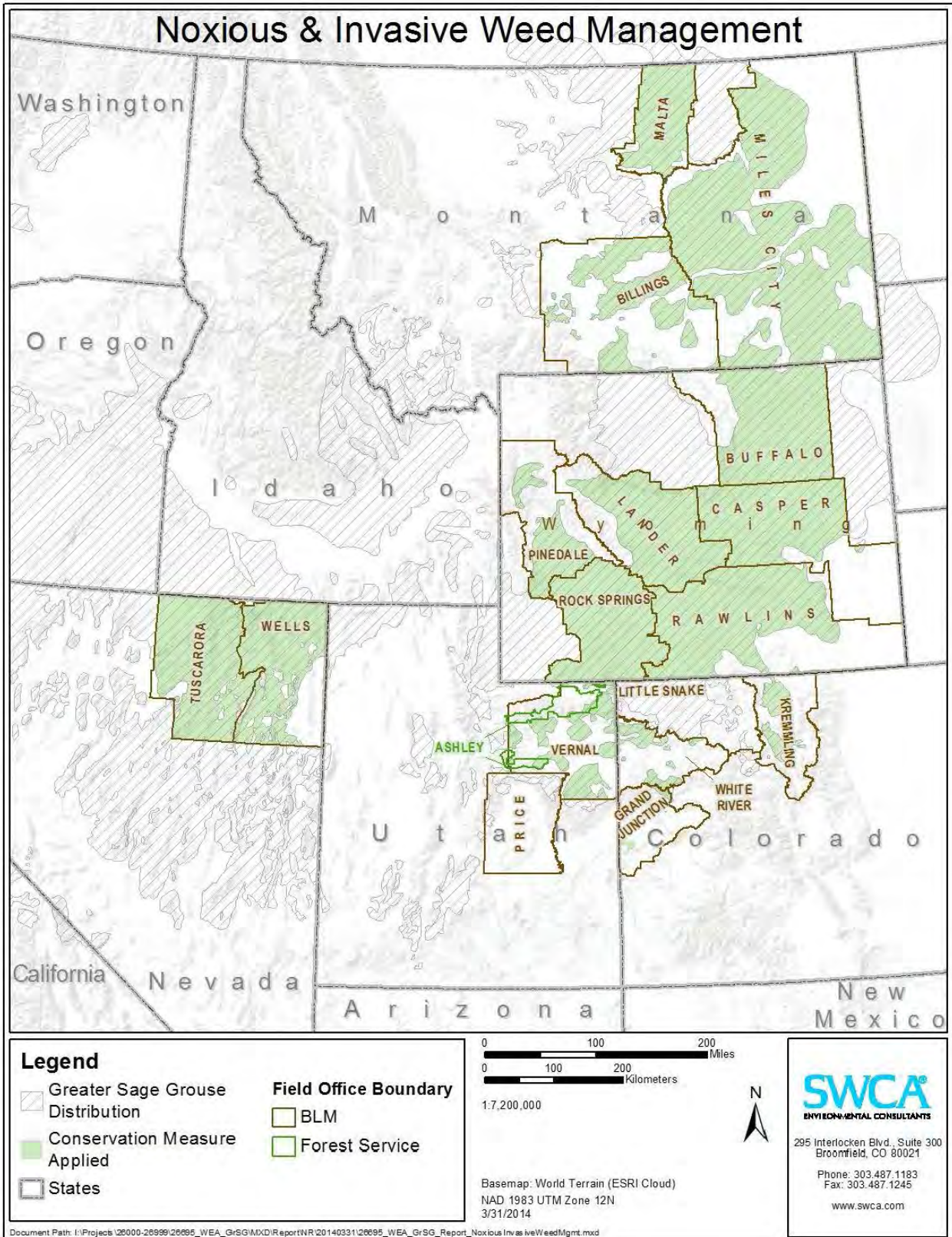


Figure G-1. Map of FOs where Noxious/Invasive Weed Management COAs are applied.

**Table G-2. Noxious/Invasive Weed Management COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko. Doty Mountain POD C in Atlantic Rim EA. WY-030-07-EA-240. 2008.	Rawlins Field Office, BLM	The Anadarko Reclamation Plan includes a weed management plan to address weed control.
Anadarko. Doty Mountain Plan of Development D in Atlantic Rim. DOI-BLM-WY-030-2012-0093-EA. 2012.	Rawlins Field Office, BLM	The Anadarko Reclamation Plan includes a weed management plan to address weed control.
Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Annual monitoring and control of invasive and noxious weeds beginning the first season of disturbance; Monitoring and management of reclamation sites to evaluate weed populations, reclamation success, and to plan and report on the program annually; and Affirmative efforts to resist the spread of weeds including refraining from cleaning out equipment including filters on the site, and power washing machinery and equipment between work sites consistent with the Rawlins Weed Prevention Plan (USDI-BLM 1999).
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Conduct pre-construction surveys in the spring for weed infestations within the site boundaries and along access roads. Consult Duchesne County Weeds Department to determine treatment for noxious weeds, if identified. Construction vehicles and equipment will be cleaned, power-washed, and free of soil and vegetation debris prior to entry and use of access roads to prevent transporting weed seeds. All seed mixtures, erosion control materials, and reclamation materials will be certified weed free. Revegetated areas will be monitored following seeding to evaluate the need for supplemental seeding and noxious weed control. The ROW and other disturbed areas will be monitored for weed infestations, and new or expanding populations will be controlled or eradicated for the duration of the construction, operation, and reclamation phases. The presence of designated weeds in the Project Area requires that the Operator develop and implement management measures to prevent the spread of noxious weeds and install a monitoring system. During the construction phase of the project, the Operator will implement an intensive reclamation and weed control program after each segment of project completion.
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	It is the responsibility of the operator to control noxious weeds on lands disturbed in association with oil and gas lease operations. Lease associated weed control strategies are to be coordinated with any involved surface owners and local weed control boards.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rock Springs Field Office, BLM Rawlins Field Office, BLM	Implementation of environmental protection measures (including the use of a native, weed-free reclamation seed mixture) and the development and implementation of a site-specific reclamation plan and noxious weed management plan, would minimize the potential for the establishment of noxious weeds and invasive species. These plans would be developed during the APD process.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	The ROW and other disturbed areas will be monitored for weed infestations, and new or expanding populations will be controlled or eradicated for the duration of the construction, operation, and reclamation phases.
Double Eagle Petroleum. Catalina PODs G and I in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	The DEPC Reclamation Plan would include a weed management plan to address weed control.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. WY-030-08-EA-222. 2008.	Rawlins Field Office, BLM	COAs have been added to control the spread, establishment, and plant community changes associated with weed infestation.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	The operator has prepared a Weed Management Plan (Appendix E). Weeds would be controlled on all disturbed areas during the life of the project.
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	Clean all construction equipment to remove seed and soil prior to bringing equipment into the project area.



Citation	Field Office	Description
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	Before entering BLM lands, all construction, heavy or off-road equipment and transport (backhoes, trackhoes, dozers, blades, rollers, lowboys, equipment trailers, etc.), pickup trucks, SUVs, vans, water trucks, pipe trucks, etc., shall be power washed to remove seeds, soil, and vegetative matter. If noxious weeds are found, they shall be treated (if timing is appropriate) or removed (if plants have formed seeds) prior to ground-disturbing activities to limit weed seed production and dispersal. If the treatment timing is not appropriate for the weed species, ground-disturbing activities may proceed.
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	Noxious Weed Inventory record shall be completed each time a List A or B weed infestation is inventoried (with the exception of redstem filaree and quackgrass)... c. Inventories for the presence of noxious weeds shall be conducted at least once early in the growing season for all areas disturbed by oil and gas exploration and development. Weeds shall be treated in an appropriate manner if found.
EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.	White River Field Office, BLM	The operator should monitor the project site for a minimum of three years after construction to detect the presence of noxious/invasive species. Any such species that occur will be eradicated.
EnCana Oil and Gas. Master Development Plan for the SG E34 496, SG L796 and SG F22 496, Environmental Assessment and Decision Record, DOI-BLM-CO-2013-0035-EA, 2013.	White River Field Office, BLM	The operator should eliminate any noxious plants before seed production occurs. The operator should clean all off-road equipment to remove seed and soil prior to commencing operations within the project area. In order to minimize the potential for invasion of noxious and invasive species, the operator should attain sufficient cover of native reclamation species (similar to that of nearby undisturbed native plant, communities in a healthy early-seral state).
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Invasive species/noxious weed monitoring forms would be completed and submitted to the BLM. A weed control plan would be prepared and implemented based on BLM's approval. On BLM lands, an approved Pesticide Use Proposal would be obtained before the application of herbicides or other pesticides for the control of noxious weeds.
EnCana Oil and Gas. Story Gulch Application for Permit to Drill (32) - 16 additional wells on F25 pad & B36 pad each. OI-BLM-CO-110-2010-0207-DNA. Approved 9/1/10 by White River Field Office.	White River Field Office, BLM	Before entering BLM lands, all construction, heavy or off-road equipment and transport (backhoes, trackhoes, dozers, blades, rollers, lowboys, equipment trailers, etc.), pickup trucks, SUVs, vans, water trucks, pipe trucks, etc., shall be power washed to remove seeds, soil, and vegetative matter. If noxious weeds are found, they shall be treated (if timing is appropriate) or removed (if plants have formed seeds) prior to ground-disturbing activities to limit weed seed production and dispersal. If the treatment timing is not appropriate for the weed species, ground-disturbing activities may proceed. The center points of List A and B weed infestations (with the exception of redstem filaree and quackgrass) shall be marked with a GPS unit, or, GPS lines or polygons along or around weed infestations. b. A Noxious Weed Inventory record shall be completed each time a List A or B weed infestation is inventoried (with the exception of redstem filaree and quackgrass). c. Inventories for the presence of noxious weeds shall be conducted at least once early in the growing season for all areas disturbed by oil and gas exploration and development. Weeds shall be treated in an appropriate manner if found during inventories. Follow-up inventories and re-treatment during the same growing season may be necessary to provide additional control and/or eradication.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	The operator should monitor the project site for a minimum of three years after construction to detect the presence of noxious/invasive species. Any such species that occur will be eradicated.
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	Reports regarding invasive species and weed management and reclamation success shall be submitted to the Grand Junction Field no later than December 1 of each year, in compliance with the joint BLM/Forest Service Noxious and Invasive Weed Management Plan for Oil and Gas Operators.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Noxious and invasive weed species shall be controlled on all surface disturbance areas in the project area by the use of mechanical and/or chemical treatments designed to best control weed species at a specific site.
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Noxious and invasive weed species shall be controlled on all surface disturbance areas in the project area by the use of mechanical and/or chemical treatments designed to best control weed species at a specific site.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Noxious and invasive weed species shall be controlled on all surface disturbance areas in the project area by the use of mechanical and/or chemical treatments designed to best control weed species at a specific site.

Citation	Field Office	Description
EOG. Environmental Assessment for Spicer 3-32H and Surprise 2-05H Applications for Permits to Drill (APDs) in Jackson County. CO-120-08-42-EA. Bureau of Land Management Kremmling Field Office. 2008.	Kremmling Field Office, BLM	Control of noxious weeds will be required through successful vegetation establishment and/or herbicide application.
EOG. EA for 4 Applications for Permit to Drill (APDs & ROWs) in Jackson County. DOI-BLM-CO-120-2009-0003. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	Control of noxious weeds will be required through successful vegetation establishment and/or herbicide application.
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	XTO will monitor the area of the Proposed Action until final abandonment to detect the presence of noxious and invasive species, and be responsible for eradication of noxious weeds and cheatgrass using materials and methods authorized in advance by the AO.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Broadcast spraying of herbicides for noxious weed control will be restricted in sage-grouse habitat unless approved by the BLM AO or field representative. All weed control programs in sage-grouse habitat will use integrated weed management techniques to reduce the area of treatment and minimize adverse side effects.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Noxious weeds will be controlled on disturbed areas in accordance with guidelines established by the EPA, BLM, State, and local pesticide authorities.
Fidelity Exploration and Production Company. Tongue River - Badger Hills Project Plan of Development EA, Decision Record and Finding of No Significant Impact. 2004.	Miles City Field Office, BLM	Prior to the use of pesticides on public land, the holder must obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers and any other information deemed necessary by the authorized officer to such use. Disturbed areas must be monitored annually for the presence of noxious weeds from June through August. Monitoring must begin prior to disturbance.
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	Prior to the use of pesticides on public land, the holder must obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers and any other information deemed necessary by the authorized officer to such use. Disturbed areas must be monitored annually for the presence of noxious weeds from June through August. Monitoring must begin prior to disturbance.
Fidelity Exploration and Production Company. Coal Bed Natural Gas Tongue River – Decker Mine East Federal Project. Finding of No Significant Impact and Decision Record. Environmental Assessment MT-020-2008-345. 2008.	Miles City Field Office, BLM	Prior to the use of pesticides on public land, the holder must obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers and any other information deemed necessary by the authorized officer to such use. Disturbed areas must be monitored annually for the presence of noxious weeds from June through August. Monitoring must begin prior to disturbance.
Fidelity Exploration & Production Company. Coal Bed Natural Gas Tongue River - Deer Creek North Federal Project. Environmental Assessment MT-020-2008-310. Finding of No Significant Impact and Decision Record, 2008.	Miles City Field Office, BLM	Prior to the use of pesticides on public land, the holder must obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers and any other information deemed necessary by the authorized officer to such use. Disturbed areas must be monitored annually for the presence of noxious weeds from June through August. Monitoring must begin prior to disturbance.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	All state- and county-listed noxious weeds (and those identified by the AO) will be controlled if introduced by project-related activity. A pre-project inventory for noxious and listed weeds will be conducted in all areas subject to surface disturbance to identify treatment needs and to aid in the development of an AO-approved weed treatment plan. Gasco will develop and implement an AO-approved noxious weed inventory, monitoring, and control program for the project disturbance areas.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators will undertake aggressive invasive plant species and noxious weed control or removal in disturbed areas, be responsible for weed control on all disturbed areas in the JIDPA, and be responsible for consultation with the Authorized Officer and/or local authorities for acceptable weed control methods.

Citation	Field Office	Description
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming, 2008.	Pinedale Field Office, BLM	Sites must be free from all species listed on the Wyoming and Federal noxious weed list. All state and federal laws regarding noxious weeds must be followed. Other highly competitive invasive species such as cheatgrass and other weedy brome grasses are also prohibited.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	In accordance with the procedures described in its Pesticide/ Herbicide Use Plan, KMG will monitor for the growth of invasive species resulting from surface disturbance caused by Project activities and will control weeds caused by Project activities.
Lance Oil & Gas Company. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Lance Oil & Gas Company. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Lance Oil & Gas Company. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM Wells Field Office, BLM	Noble would clean all equipment and vehicles prior to each entry into public lands in the project area to prevent the spread of noxious weeds. This process would be presented to the BLM for approval prior to commencement of operations. Early detection would be encouraged through the reporting and prompt treatment of weed infestations, particularly Category A species. Weed identification pamphlets, available from the Nevada Department of Agriculture, would be made available to Noble employees in the field. If weeds are located in an area proposed for vibroseis truck traffic, they would be treated prior to ground-disturbing activities. This may involve herbicide, or mechanical removal. Herbicide use on BLM-administered lands would be approved by the BLM prior to use.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Weed infestation would also be documented so appropriate treatment can occur.
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	All disturbances shall be monitored for noxious weeds annually, for a minimum of 3 growing seasons following completion of project or until desirable vegetation is established.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	QEP would monitor and control noxious and invasive weeds along access road use authorizations, pipeline route authorizations, well sites, or other applicable facilities by spraying or mechanical removal.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming, 2008.	Pinedale Field Office, BLM	Sites must be free from all species listed on the Wyoming and federal noxious weed lists. All state and federal laws regarding noxious weeds must be followed. Other highly competitive invasive species such as cheatgrass and other weedy brome will be actively treated if found in the reclaimed areas,
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Wellstar. EA for Applications for Permits to Drill (APDs) Federal #9-1, Bush Draw Federal #10-2, and Bush Draw Federal #15-1 wells in Jackson County. OI-BLM-CO-120-2009-0002-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	Control of noxious weeds will be required through successful vegetation establishment and/or herbicide application
Wellstar. EA for Applications for Permits to Drill (APDs) Bush Draw Federal 18-1 and 3-2 in Jackson County. DOI-BLM-CO-120-2009-0057-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	Control of noxious weeds will be required through successful vegetation establishment and/or herbicide application.
Williams Production RMT Company, Cedar Draw Unit 3, WY-070-EA11-236, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	The operator will be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with this project (well locations, roads, water management facilities, etc.)

<b>Citation</b>	<b>Field Office</b>	<b>Description</b>
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	Weed control is integral to the success of project reclamation; the RSFO Weed Management Plan found in Appendix E will be followed. Forbs and shrubs may be seeded after grasses have become established and weedy species are under control.

**APPENDIX H**  
**Reduce Traffic**

**Table H-1. PECE Policy Evaluation – Reduce Traffic**

Conservation Measure	Reduce Traffic
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Reduce Traffic</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Reduced traffic COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	NEPA processes generally identify dates and times for implementation of all measures and COAs.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include implementing speed limits, carpooling to reduce traffic, and remote monitoring. These are detailed within the COAs and conservation measures.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Parameters can be measured through documentation of animal-vehicle collisions and lek attendance to determine if the standards set in the COAs and conservation measures are met.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

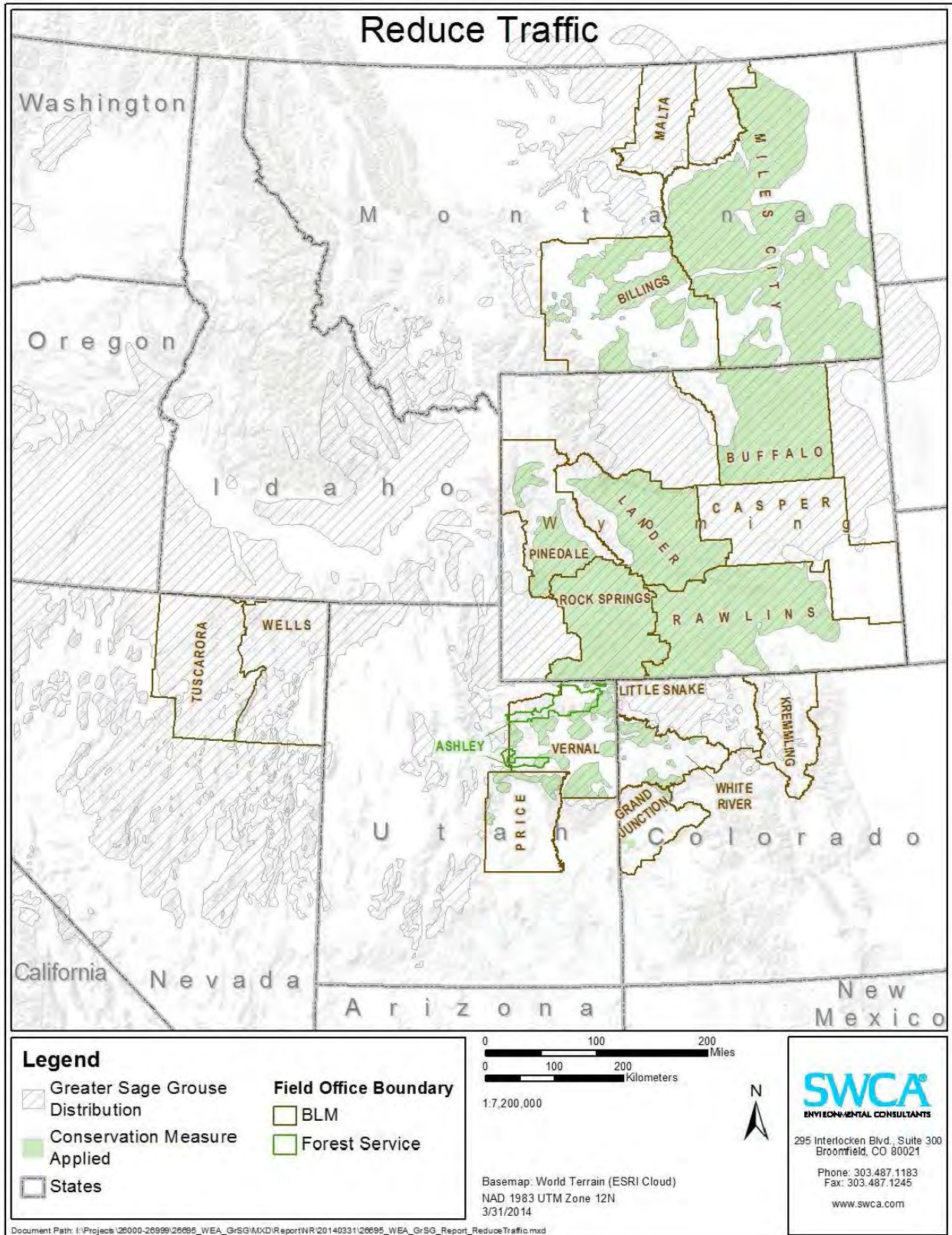


Figure H-1. Map of FOs where Reduce Traffic COAs are applied.



**Table H-2. Reduce Traffic COAs and Conservation Measures**

Citation	Field Office	Description
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Operators and their contractors will observe and promote adherence to speed limits in the project area, and erect signs in lambing/calving areas, shipping pastures, or adjacent to working corrals to warn vehicle Operators (FEIS, section 4.6.5.4).
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Remote monitoring of well locations would be required where feasible.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	These Best Management Practices (BMPs) will be applied under all alternatives as Conditions of Approval where proposals conflict with identified resources. 7) Transportation planning to align roads out of sight and sound of leks, and to schedule traffic to avoid greater sage-grouse and Columbian sharptailed grouse activity periods.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Project-related activities and vehicle access will not be allowed on the Nutters Ridge Road (FSR 333) or the Wire Fence Ridge Road (FSR 332), south of the Operator’s current lease area. This will prevent disturbance to breeding, nesting, brood rearing, and wintering sage grouse that might otherwise occur if project-related access along these roads were permitted.
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads (except county roads) will not exceed 25 miles per hour.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Under the Selected Alternative, BBC and other operators may construct/improve an airstrip on each of the mesas. Use of airstrips has the potential to reduce the amount of vehicle traffic. No upgrades will be allowed to the Interplanetary Airstrip to minimize impacts to sage-grouse.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Under the Selected Alternative, BBC and other operators will use a combination of pipelines and trucking to transport water and condensate from well pads, pump stations and CTBs to the water management facilities on each mesa. Water/condensate lines will not be required in areas where development is considered exploratory, remote, or where topography prohibits.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Apply mitigation measures to reduce mountain plover, swift fox or sage grouse mortality caused by increased vehicle traffic. Construct speed bumps, use signing or post speed limits as necessary to reduce vehicle speeds near sage grouse leks, mountain plover habitat, or other important wildlife habitats.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Avoid, where possible, locating roads in crucial sage grouse breeding, nesting and wintering areas and mountain plover habitats. Develop a route utilizing topography, vegetative cover, site distance, etc. to effectively protect identified wildlife habitats in a cost efficient manner.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Develop a comprehensive Project Plan prior to POD or full field development activities to minimize road densities.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Utilize remote monitoring technologies whenever possible to reduce site visits thereby reducing wildlife disturbance and mortalities.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Well field access roads and other roads with project-related traffic increases will be monitored for wildlife mortality so that specific mitigation can be designed and implemented as deemed necessary by BLM, in consultation with MFWP, for areas with high traffic volume and/or increased wildlife/vehicle collisions and mortality.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	The use of remote sensing, where technically feasible, would be encouraged.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Remote monitoring of wells and pipelines to reduce field visits during operations and reduce stress on raptors and other wildlife.
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	3-Phase Gas gathering system with 6 pipelines to be located within the same trench.

Citation	Field Office	Description
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Reasonable efforts would be made to organize transportation and access routes that minimize traffic volumes and avoid suitable sagebrush habitats to the greatest extent practicable.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Reduced vehicle speeds through occupied habitats... reduced frequency of vehicle traffic during well development through vehicle pooling...
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant has independently identified primary access to these locations from the east via 4.2 miles of improved Divide Road (established private access from Parachute Creek). This route bisects about 235 acres of occupied or suitable sage-grouse habitat, but relative to alternative access (Barnes Ridge and Sprague Gulch) these narrow ridgeline positions on the eastern margin of the PPR population area are sparsely populated and thought to serve a small proportion of the Barnes Ridge subpopulation. This alternative access route involves the smallest intersect of occupied sage-grouse habitat realistically available (including Sprague Gulch). The applicant agreed to accept a BLM Condition of Approval that will establish the applicant's intent to avoid the use of Bame's Ridge for development-related access.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	...and through the decades long production phase through remote well monitoring.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office	White River Field Office, BLM	The applicant chose access routes that minimize traverse lengths through higher quality or more consistently occupied habitats.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office	White River Field Office, BLM	Well maintenance will not be considered new disturbance, but would be minimized to the extent practicable during the Critical Habitat Season. EnCana would provide the CPW and BLM notice of well maintenance and would maintain records of these operations. Multiple rig moves would not occur simultaneous; however, EnCana would use reasonable efforts to schedule rig moves outside of the Critical Habitat Season.
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	Big Game Winter Range Timing Limitation: Where lease stipulations do not apply to areas identified as winter range, a Timing Limitation (TL) period from January 1 to March 1 shall apply. To minimize impacts to wintering big game, no construction drilling, completion, or other intensive activities shall occur. Further, from December 1 to May 1, remote sensing should be used for production monitoring, and unavoidable monitoring or maintenance activities should be conducted between 9am and 3pm. Requests for exceptions shall be submitted in writing, by letter or sundry notice, to the Grand Junction Field Office Manager. Where lease stipulations do apply to areas identified as winter range, a Timing Limitation (TL) period from December 1 to May 1 shall apply. To minimize impacts to wintering big game, no construction, drilling, completion, or other intensive activities shall occur. Further, during this TL, remote telemetry shall be used to monitor production. Unavoidable monitoring or maintenance activities shall be conducted between 9am and 3pm to the extent possible. Requests for exceptions shall be submitted in writing, by letter or sundry notice, to the Grand Junction Field Manager.
EOG Resources, Inc. Ballista Flatbow Multi-Well Pad Project, supported by Environmental Assessment (EA), WY-070-EA13-15, Buffalo Field Office. 2013.	Buffalo Field Office, BLM	Using telemetry and remote monitoring equipment and techniques that reduce the number of physical visits to each well pad.
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	XTO will provide all drivers with information and possibly training with regard to the types of wildlife species in the area that are susceptible to vehicular collisions, in order to reduce the risk to raptors feeding on road-killed carrion. Vehicle collisions with raptors, sage-grouse, and all other wildlife species will be reported to the BLM-White River Field Office, the local CPW Manager, and the USFWS Grand Junction office.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	All vehicle operators would be provided training, with regard to the types of wildlife species in the area that are susceptible to vehicular collisions, in order to reduce the risk to bald eagles, other raptors, and other wildlife feeding on road-killed carrion. The circumstances under which such collisions could occur, and measures, including reduced speeds, that could be employed to minimize them, would be discussed. Vehicle collisions with bald eagles, raptors, sage grouse, and all other wildlife species would be reported to the BLM-White River Field Office and the local Colorado Division of Wildlife District Wildlife Manager.

Citation	Field Office	Description
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming, 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators will utilize remote telemetry or equivalent technology at all wells to minimize well monitoring trips, unless proven to the satisfaction of the Authorized Officer on a case-by-case basis that installation of remote telemetry or equivalent technology would not be technically or economically feasible, or that another method would create less environmental impact.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Project wells will utilize centralized compression facilities. The use of telemetry will reduce the frequency of well visits and therefore decrease vehicle traffic within the GNBPA, one objective of combining production facilities.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Roads within 2 miles of an active greater sage-grouse lek will be constructed to the minimum standard and width possible to meet safety concerns. In addition, road maintenance activities during the greater sage-grouse breeding season (between February 15 and June 15) will be minimized.
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads (except county roads) will not exceed 25 miles per hour except travel along roads within 1/2 mile of the Kinney Draw I, II, III sage-grouse leks and the Nurse Draw lek. These roads will be posted at 10 mph.
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	To limit travel through leks, place five "No Oil and Gas Traffic" signs; one at each entrance/exit through leks. There will be three signs placed in section 3, one sign placed in section 9 and one sign in section 10.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads will not exceed 25 miles per hour except travel along roads within 1/2 mile of the Fleetwood Draw sage grouse lek located in. These roads will be posted at 10 mph.
Lance Oil & Gas Inc., Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads will not exceed 25 miles per hour except travel along roads within 1/2 mile of the Indian Creek IV lek. These roads will be posted at 10 mph. This will affect the road accessing the 43-1 well.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	Well metering shall be accomplished by telemetry. Metering would entail 2-3 visits per month during the summer and 4 visits per month during the winter months.
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	LOG will incorporate remote monitoring telemetry to reduce human visitation once wells are producing
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Pipe all produced water from PVUE POD to a water treatment plant, then discharge into Powder River to reduce potential for West Nile habitat
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Maximum design speed on all operator constructed and maintained roads will not exceed 25 miles per hour to minimize the chance of a collision with a bald eagle, other wildlife, or livestock.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Required a Water Management Plan.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	Produced water from drilling shall be gathered and transported via QEP's authorized liquid gathering system.
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	Produced water from drilling shall be gathered and transported via QEP's authorized liquid gathering system.
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT_G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	Well site telemetry would be utilized as feasible for production operations.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Reduction in traffic, disturbance, and human footprint presence decreases impacts to grouse. This ROD requires Ultra, Shell, and Questar to install a liquids gathering system to reduce the amount of truck traffic associated with production. This is expected to eliminate approximately 165,000 truck trips annually during peak production.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	Yates Petroleum Corporation submitted a mitigation plan to BLM that addresses potential impact mechanisms known, or suspected to affect sage-grouse recruitment and survival. These include: A quantified travel plan that minimizes well site visits

Citation	Field Office	Description
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	After the wells are complete, well metering, maintenance and other site visits will be limited to an average of 3 visits to each well location per week (up to 12 visits per well/month for the first six months). The company will be required to report frequency of site visits, after the wells are complete, along with repairs made and problems identified resulting from the visits. The company will submit these reports to BLM at the end of every month. The BLM will use site visit data in order to determine the necessary frequency of site visits.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	Roads within 1/2 mile of sage grouse leks will be posted (with signs shorter than four feet) by the operator at 10 mph during daylight hours between March1-June 15.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	Throughout production, human presence will be limited with the deployment of the most recent technology (For example, cameras and remote sensing )
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads (except county roads) will not exceed 25 miles per hour except travel along roads within 1/2 mile of sage grouse leks will be posted (with signs shorter than four feet) by the operator at 10 mph during daylight hours between March1-June 15.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits will be allowed monthly, 3 per week for the first six months after the wells are completed. The company will be required to monitor frequency of site visits along with repairs made and problems identified resulting from the visits. Reports containing results of this monitoring will be submitted to BLM at the end of every month. The BLM will use this data to determine the necessity of multiple monthly site visits during the sage-grouse breeding and nesting periods (March 1 to June 15).
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	Maximum design speed on all operator-constructed and maintained roads (except county roads) will not exceed 25 miles per hour except travel along roads within 1/2 mile of any known leks.

**APPENDIX I**  
**Reduce Noise and Visual Impacts**

**Table I-1. PECE Policy Evaluation – Reduce Noise and Visual Impacts**

Conservation Measure	Reduce Noise and Visual Impacts
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

<b>Conservation Measure</b>	<b>Reduce Noise and Visual Impacts</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Reduced noise and visual impact COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	In many cases, specific decibel level thresholds are identified or desired.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include installing noise mufflers and shields, siting compressors and other facilities outside of given buffers around leks
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Parameters can be measured by decibels, with a typical goal not to exceed 49 decibels as provided by state wildlife agencies.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

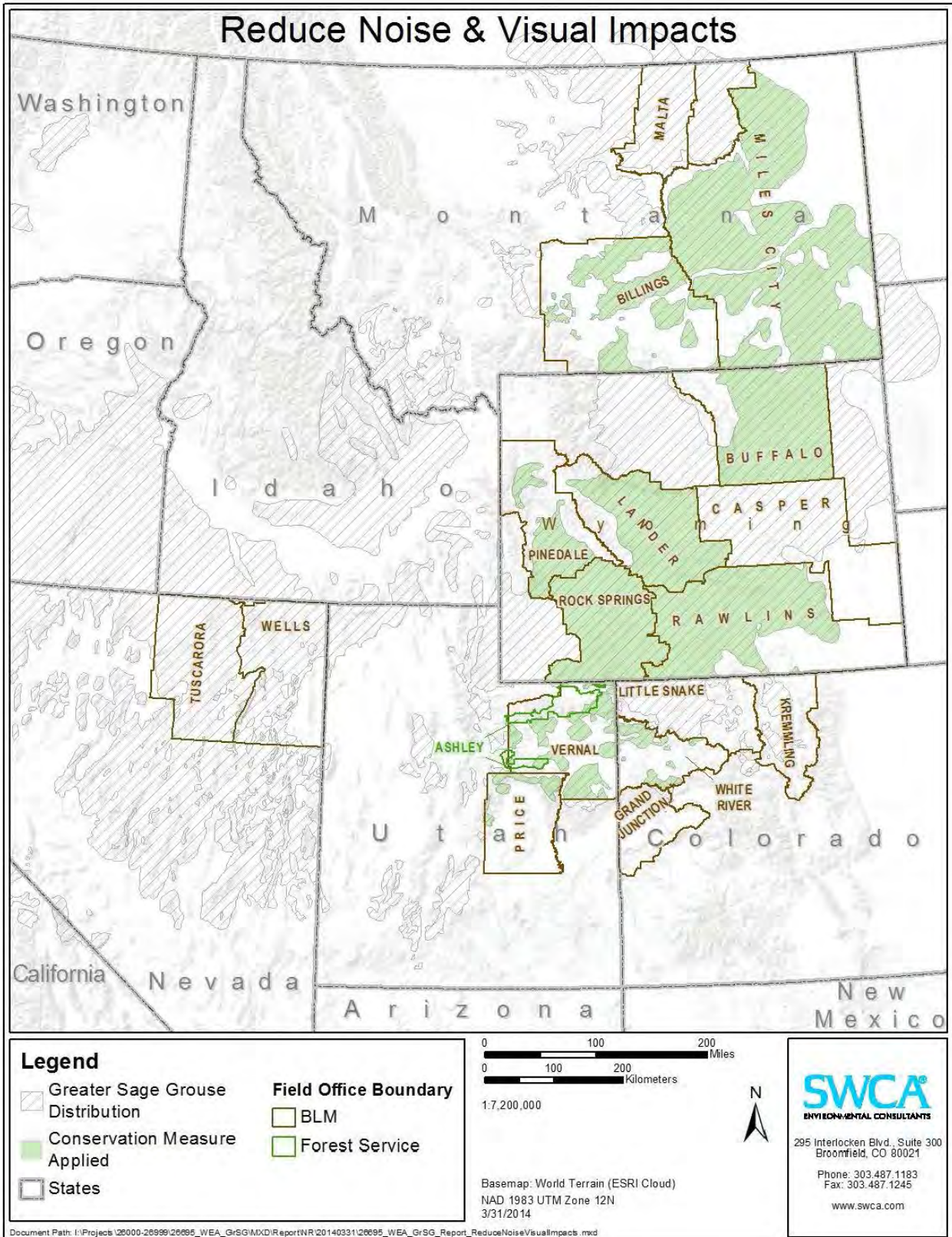


Figure I-1. Map of FOs where Reduce Noise and Visual Impacts COAs are applied.



**Table I-2. Reduce Noise and Visual Impacts COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	Noise mufflers will be installed on the exhaust of compressor engines to reduce the exhaust noise. Where noise impacts to existing sensitive receptors are an issue, noise levels will be required to be no greater than 55 decibels measured at a distance of one-quarter mile from the appropriate booster (field) compressor. When background noise exceeds 55dBA, noise levels will be no greater than 5dBA above background. This may require the installation of electrical compressor motors at these locations.
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	Noise mufflers will be installed on the exhaust of compressor engines to reduce the exhaust noise. Where noise impacts to existing sensitive receptors are an issue, noise levels will be required to be no greater than 55 decibels measured at a distance of one-quarter mile from the appropriate booster (field) compressor. When background noise exceeds 55dBA, noise levels will be no greater than 5dBA above background. This may require the installation of electrical compressor motors at these locations.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	In order to minimize noise disturbances to strutting or dancing grouse, compressor stations and generators will be muffled with hospital-style mufflers.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Pump jack engines will be equipped with high-grade mufflers to reduce noise during the operational LOP.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	To reduce noise levels down to an acceptable level so as not to disturb strutting birds or cause lek abandonment, all wells within 3.1 miles of a lek will be muffled with the latest technology to reduce noise levels from wells down to no more than 45dB at a lek. All wells within 3.1 miles of a lek will have mufflers oriented away from leks.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	All applicable production equipment, including compressor engines, will have hospital grade mufflers.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Different management actions affecting location, size, and muffler requirements would be applied to compressors.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage-grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	To minimize the possible impacts of project related noise on wildlife, muffle and maintain all motorized equipment according to manufacturers' specifications.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Site disturbance would use topographic features whenever possible to shield leks from new disturbance.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant will make efforts to muffle and redirect noise emanating from on- site compression facilities (if used) in a manner that would substantially reduce noise-reception from occupied sage-grouse habitats on adjacent ridgelines (for example, using heavy side-slope vegetation and distance to attenuate noise and considering prevailing winds to align residual transmission down-canyon for F22, downwards NNE into canyon for E34/L27).
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	The applicant will use the lowest intensity lights that safety requirements will allow and make efforts to shield fixtures to reduce the intensity of light visible from adjacent ridgeline habitats.

Citation	Field Office	Description
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	In addition to other restrictions for activities within a 2-mile distance from active sage-grouse leks, noise levels would be required to be no more than 10 decibels on the A-weighted scale (dBA) above background levels.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	To help prevent reproductive failure for any potential sage grouse in the vicinity of the generator or compressor, noise would be regulated and limited to 49 decibels (BLM 2003a).
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Limit noise at the fence line of the CTF so as not to exceed 65 decibels.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	Within 0.5 mile of known active leks, the best available technology will be used to reduce noise, e.g., installation of multi-cylinder pumps, hospital sound-reducing mufflers, and placement of exhaust systems.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	All engines and compressor exhaust stacks would be muffled and maintained according to manufacturers' specifications.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Within 2 miles of an active greater sage-grouse lek, the best available technology (e.g., installation of multi-cylinder pumps, hospital sound reducing mufflers or other sound reducing devices, and placement of exhaust systems) will be installed as appropriate to reduce noise levels at, or direct noise away from, active greater sage-grouse leks. The reduction of noise levels will be reduced to decibels on the A-weighted scale levels established in ongoing and future studies regarding noise impacts to greater sage-grouse.
Lance Oil & Gas Company Inc. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	The operator will locate compressor stations so that noise from the stations at any nearby mapped sage-grouse or sharp-tailed grouse display grounds does not exceed 49 dB (10 dBA above background noise) at the display ground.
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will locate compressor stations so that noise from the stations at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will locate compressor stations so that noise from the stations at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	QEP shall submit a sundry notice to the BLM detailing a noise mitigation plan to be in effect for sage grouse prior to the onsite of big game winter range closures January 1 and shall detail how QEP will mitigate operations resulting in noise no greater than 10 decibels (dba) above local background data.
QEP. EA to re-enter the existing WRB 16-17-10-17 EA, DOI-BLM-UT_G010-2012-0151, BLM Vernal Field Office. 2012.	Vernal Field Office, BLM	Within 2 miles of active lek; use best available technology such as multi-cylinder pumps, hospital sound reducing muffler and placement of exhaust systems to reduce noise.

Citation	Field Office	Description
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	In selecting a site for a compressor facility, a well pad or other permanent facility, the distance from the edge of a an occupied greater sage-grouse lek will be sufficient to result in a noise level increase from operating facilities no greater than 10 decibels (dBA) above background (i.e., 39 dBA background + 10 dBA = 49 dBA). Further restrictions may be required if the species is determined by the USFWS to be eligible for listing as either threatened or endangered pursuant to the Endangered Species Act. Monitoring will be required by BLM to determine which leks in the PAPA are occupied and which have been abandoned.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Operators may be required to apply noise mitigation at well locations, as determined necessary by the BLM AO, on a case-by-case basis.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Table B.1 Standard 5: Decibel levels at the lek more than 10 dBA above background measured from the edge of the lek (2000 ROD, p.27), and a concurrent average of 30% decline in peak numbers of male birds over 2 years vs. reference area, additional mitigation responses are applied.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	To avoid potentially significant noise impacts, compressor engines will be located 2,500 feet or more from a dwelling or residence and from sage-grouse leks.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	Noise from infrastructure within the POD is not to exceed 49 decibels (10 dBA above background noise) at any nearby sage grouse or sharp-tailed grouse display grounds. The Companies will locate compressor stations so that noise from the stations at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Yates Petroleum Corporation. Napier Road POD Environmental Assessment WY-070-EA10-280, 2010.	Buffalo Field Office, BLM	The Companies will locate facilities so that noise from the facilities at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.

**APPENDIX J**  
**Reduce Perching Predators**

**Table J-1. PECE Policy Evaluation – Reduce Perching Predators**

Conservation Measure	Reduce Perching Predators
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Reduce Perching Predators</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	COAs and conservation measures that reduce perching predators address threats associated with Energy Development and Infrastructure under Listing Factor A; and Predation under Factor C.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	NEPA processes generally identify dates and times for implementation of all measures and COAs.
The steps necessary to implement the conservation effort are identified in detail.	COAs and conservation measures to reduce predation potential are generally known and include anti-perching devices and other methods or technologies. Steps to implement these measures are well documented and presented in publications and other industry information including materials prepared by the Avian Power Line Interaction Committee.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Measures lend themselves to before-after comparisons to evaluate success of the measure as measured by decreased perching or use by potential predators.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

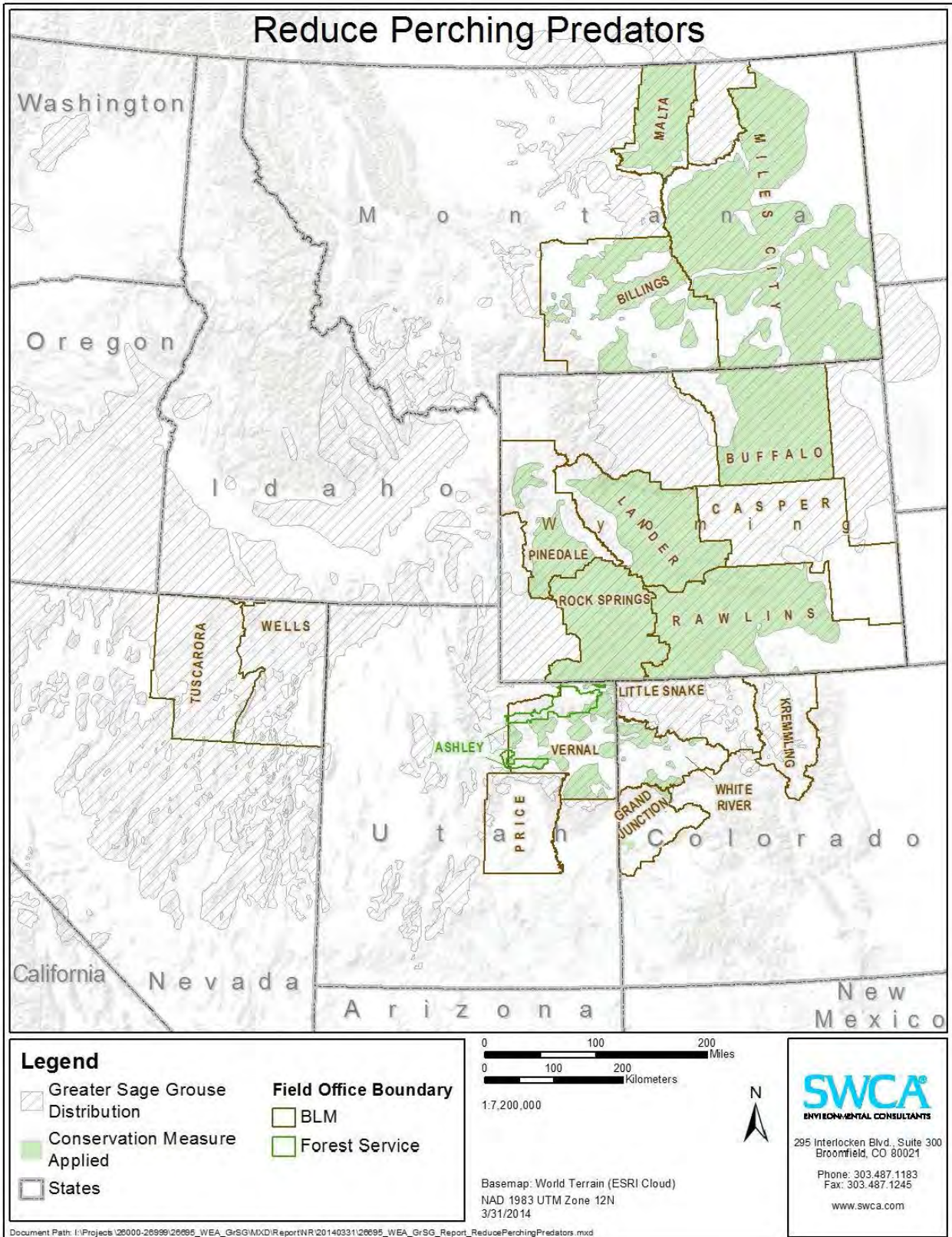


Figure J-1. Map of FOs where Reduce Perching Predators COAs are applied.

**Table J-2. Reduce Perching Predators COAs and Conservation Measures**

Citation	Field Office	Description
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Surface disturbance and other actions that create permanent and high-profile structures, such as buildings, storage tanks, and overhead power lines, will not be constructed within 0.25 to 1.0 mile of the perimeter of leks, as determined on a case-by-case basis.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	These Best Management Practices (BMPs) will be applied under all alternatives as Conditions of Approval where proposals conflict with identified resources. 6) Burying of power lines to avoid use of poles and other tall structures...
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Raptor perch avoidance devices will be installed on existing and proposed power poles and tank batteries to reduce potential predation where sage-grouse concerns exist.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	To reduce the vantage point that raptors might have by perching on new structures, low-profile tanks will be required for all well pads within sage-grouse habitat.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Lines should avoid high avian use areas such as wetlands, prairie dog towns, and grouse leks. If not avoidable, use anti-perching devices to discourage perching in sensitive habitats such as grouse leks, prairie dog towns and wetlands to decrease predation and decrease loss of avian predators to electrocution.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Minimize the number of new power lines in sage grouse or mountain plover habitat. Bury lines near sage grouse leks and mountain plover nesting habitat when feasible.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM Rock Springs Field Office, BLM	To minimize raptor perching and nesting, BLM approved raptor deterring devices would be installed on horizontal cross bars.
Chevron. Table Rock Unit Oil and Gas Development EA and DR. WY-040-EA11-175. January 2012.	Rawlins Field Office, BLM Rock Springs Field Office, BLM	WAR-1 New power lines within 2 miles of an occupied greater sage-grouse lek will either be buried or outfitted with raptor anti-perching devices based on guidance from the BLM wildlife biologist during the APD process. If burying new power lines is not feasible, new power line segments would be designed and constructed in accordance with applicable guidelines to minimize raptor perching, nesting, electrocution, and collision potential.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	Power poles within the ½ -mile visual buffer around the lek near the center of the southwest quarter of Section 13, T29N, R114W, shall not extend higher than 80 feet above natural ground level.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	The power line shall be relocated from the ridgeline in the north half of Section 14, T29N, R114W south approximately 900 feet to the north side of the of the road/two-track traverse the Spring Creek drainage.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	Creation of raptor hunting perches will be avoided within 0.5-mile of documented sage-grouse lek sites. Perch inhibitors will be installed to deter avian predators from preying on sage grouse.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	Raptor perch inhibitors will be installed along powerlines that are adjacent to areas with documented sage-grouse use.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	The Companies will locate aboveground power lines, where practical, at least 0.5 mile from any sage-grouse breeding or nesting grounds to prevent raptor predation and sage-grouse collision with the conductors. Power poles within 0.5 mile of any sage-grouse breeding ground will be raptor-proofed to prevent raptors from perching on the poles.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Anti-perching devices will be required on all above ground power structures, including the 230 kV power line, associated with the proposed action.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	The 25 kV electric distribution line to the Meter Station, and any enlargement of service in the field, will be installed underground to minimize disruptions to sage-grouse Core habitat areas.



Citation	Field Office	Description
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Monitor all structures exceeding six feet in height for the presence of perching raptors or ravens.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Raptor perch deterrents would be installed on cross arms of power poles and other documented raptor perches, such as radio towers where birds are noted to perch.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Raptor deterrent perches would be used on powerlines structures within 0.5 miles of active sage-grouse leks to minimize raptors perching in the immediate area of the lek and reduce the potential for increased raptor predation during the sage-grouse breeding season.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	The buried power alternative and the hybrid power alternative were created to address concerns raised during 2007/2008 scoping about new overhead powerline construction in areas with sage-grouse habitat. The concern was that new overhead lines could provide perch locations for raptors that prey on sage grouse and thus decrease the sage-grouse population. The approved alternative reduces the amount of overhead powerlines and thus, the amount of potential perches for avian predators. The amount of surface disturbance is approximately 2% greater than the proposed project, which consists of all overhead powerlines.
EnCana. Environmental Assessment of the Orchard Master Development Plan for Oil and Gas Development. GJFO # DOI-BLM-CO-130-2009-0001-EA and GSFO # DOI-BLM-CO-140-2008-0032-EA. Grand Junction Field Office and Glenwood Springs Energy Office, October 2008.	Grand Junction Field Office, BLM	Dry hole marker shall be sub-surface, to prevent raptor predation upon small game, including sage-grouse.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Avoid and minimize above-ground power lines in areas with sage-grouse habitat condition designated as Excellent and Sagebrush Limited, respectively. See shapefiles.
Fidelity Exploration and Production Company. Tongue River - Corral Creek, Plan of Development, Environmental Assessment, Montana Board of Oil and Gas Conservation. 2008.	Miles City Field Office, BLM	Wherever possible new power lines will be located in areas that have already been disturbed. New power lines installations will be minimized in the habitats of sage-grouse or mountain plover.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	The use of low-profile tanks will be used within 2 miles of active leks, as appropriate, given the topography and as directed by the AO.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming, 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Permanent high-profile structures such as buildings and storage tanks would not be constructed within 0.25 mile of an active lek.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	KMG will utilize low-profile tanks in areas where sage grouse leks are determined to be active to minimize the opportunities for raptor perching.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Tanks for wells within 2 miles of an active greater sage-grouse lek will be located out of line-of-sight of the lek, or will be squat tanks. Off-site tanks or central tank batteries will be considered where technically and administratively feasible.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	Perch inhibitors will be installed on the one mile of new overhead powerlines
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Bury 3-phase power from power drops to wells to reduce vertical intrusions on landscape.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will construct power lines to minimize the potential for raptor collisions with the lines. Potential modifications include burying the lines, avoiding areas of high avian use (for example, wetlands, prairie dog towns, and grouse leks), and increasing the visibility of the individual conductors.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will locate aboveground power lines, where practical, at least 0.5 mile from any sage grouse breeding or nesting grounds to prevent raptor predation and sage grouse collision with the conductors. Power poles within 0.5 mile of any sage grouse breeding ground will be raptor-proofed to prevent raptors from perching on the poles.

Citation	Field Office	Description
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	As directed by the AO, QEP would place raptor perch guards on power line poles in areas near sensitive wildlife habitat areas such as sage grouse leks and prairie doe towns.
QEP. Greater Deadman Bench Oil and Gas Producing Region EIS and ROD March 2008. UT 080-2003-0369V. BLM Vernal Field Office. 2008.	Vernal Field Office, BLM	No powerlines or electrical transmission lines will be constructed that would provide perch sites for raptors within 2 miles of sage grouse habitat.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Permanent (life of the project), high profile structures such as buildings and storage tanks will not be constructed within 0.25 mile of an occupied greater sage-grouse lek.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	The Companies will locate aboveground power lines, where practical, at least 0.5 mile from any sage grouse breeding or nesting grounds to prevent raptor predation and sage grouse collision with the conductors. Creation of raptor hunting perches will be avoided within 0.5-mile of documented sage grouse lek sites. Perch inhibitors will be installed to deter avian predators from preying on sage grouse.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	Construction of structures that could be used for raptor perches would be avoided or designed to prevent raptor perching. Exceptions may be granted if the activity would occur in unsuitable sage-grouse nesting habitat.
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	Yates Petroleum Corporation submitted a mitigation plan to BLM that addresses potential impact mechanisms known, or suspected to affect sage-grouse recruitment and survival. These include: Burying power
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	All new overhead power structures will be equipped with raptor perch deterrent devices.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	All proposed power that will service the Federal action in the Gauge POD will be buried.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	The Companies will construct power lines to minimize the potential for raptor collisions with the lines. Potential modifications include burying the lines, avoiding areas of high avian use (for example, wetlands, prairie dog towns, and grouse leks), and increasing the visibility of the individual conductors.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	All proposed power will be buried in the approved corridor.

**APPENDIX K**  
**Produced Water Management**

**Table K-1. PECE Policy Evaluation – Produced Water Management**

Conservation Measure	Produced Water Management
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

<b>Conservation Measure</b>	<b>Produced Water Management</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Produced water management COAs and conservation measures address threats associated with Energy Development under Listing Factor A; Disease under Factor C; and Contamination under Factor E.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Many documents prohibit or discourage disposal or storage on the surface.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include installing closed-loop drilling systems, screening water pits and using mosquito control methods.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	The spread and distribution of West Nile Virus including around oil and gas fields can be measured. Decreases in water storage or disposal to the surface are tracked under many of the NEPA documents or by each state's water management agencies.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual lek counts are tracked by state game and fish agencies and federal land management agencies for purposes of evaluating grouse populations and health. State game and fish agencies commonly track the spread and distribution of West Nile Virus including around oil and gas fields. Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

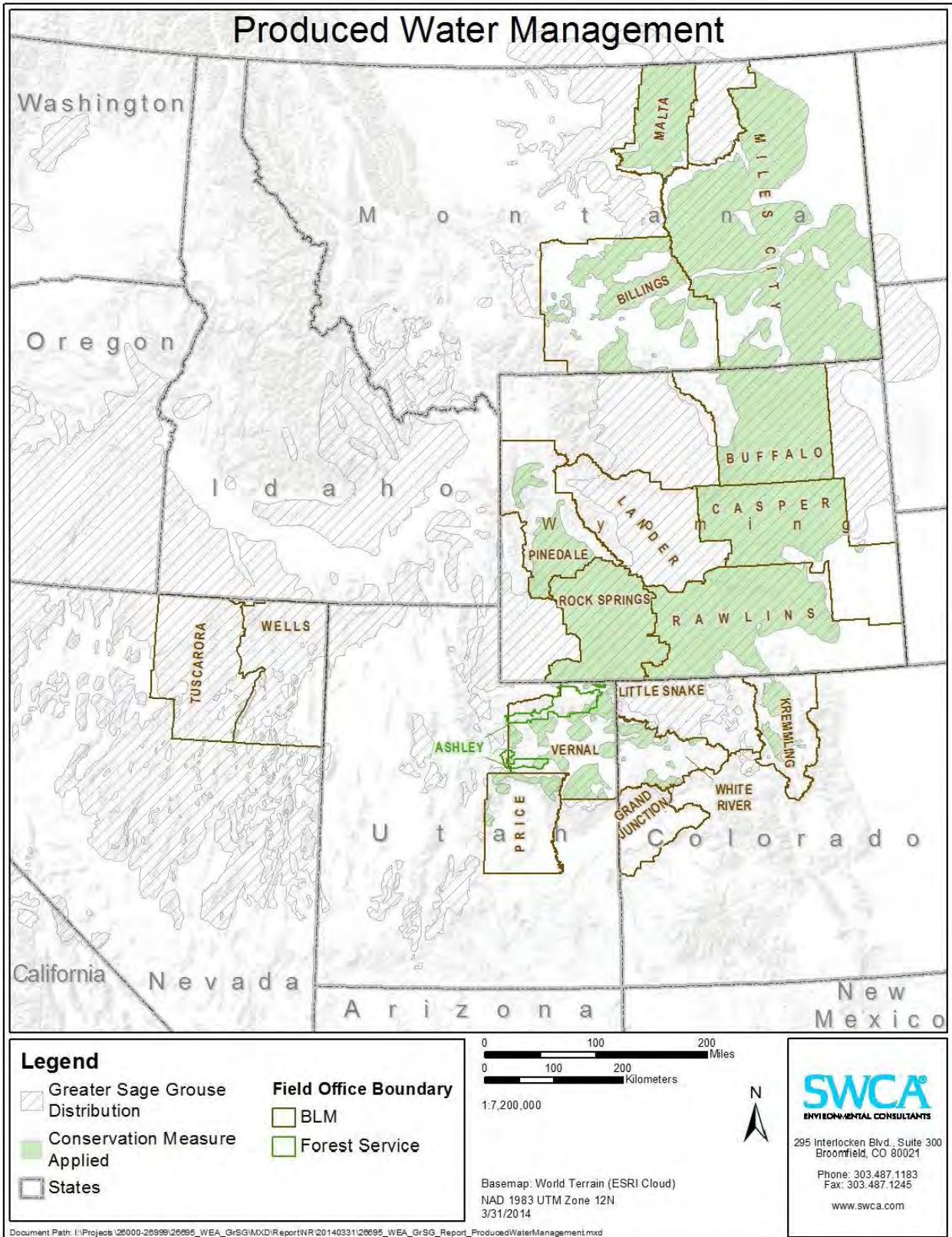


Figure K-1. Map of FOs where Produced Water Management COAs are applied.

**Table K-2. Produced Water Management COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape. See Idaho BLM Technical Bulletin 89-4 entitled Wildlife Watering and Escape Ramps on Livestock Water Developments: Suggestions and Recommendations.
Anadarko Petroleum Corporation, Dry Willow Phase V POD EA, WY-070-10-186, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Local control of mosquitoes may keep a viral outbreak from impacting local sage-grouse populations. Anadarko will monitor mosquito vectors and treat the SDI fields if the mosquito population warrants treatment.
Anadarko. Environmental Assessment for Jack Sparrow POD. WY-030-08-EA-238. 2008.	Rawlins Field Office, BLM	Use of injection wells reduces surface water.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	Use closed loop drilling to eliminate the need for reserve pits, reduce closure and waste management costs, and reduce potential for contamination from leaking.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Closed-loop drilling will be used in sensitive areas such as locations proposed within or near 100-year floodplains or drainages, cultural resources or archaeological sites, and within important wildlife habitats. The designation of a proposed location as a sensitive location requiring closed-loop drilling will be determined on a site-specific basis during the APD process
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Any avian mortality observed in pits will be documented, reported to the BLM and USFWS, and measures will be taken to prevent future mortality at the pit(s).
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Design and manage produced water storage impoundments so as not to degrade or inundate sage grouse leks, nesting sites and wintering sites, prairie dog towns or other Special Status Species habitats.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Protected reserve, workover, and production pits potentially hazardous to wildlife by netting and/or fencing as directed by the BLM to prevent wildlife access and minimize the potential for migratory bird mortality.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape. See Idaho BLM Technical Bulletin 89-4 entitled Wildlife Watering and Escape Ramps on Livestock Water Developments: Suggestions and Recommendations.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape.
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	Drilling fluids including salts and chemicals will be contained in a closed loop system. When drilling on a location is finished, the fluids are dewatered and transferred by truck to another location.
EnCana Oil and Gas. Master Development Plan for the SG E34 496, SG L796 and SG F22 496, Environmental Assessment and Decision Record, DOI-BLM-CO-2013-0035-EA, 2013.	White River Field Office, BLM	Appropriate fencing and netting on temporary fluid pits for the purpose of excluding wildlife.
EnCana Oil and Gas. Master Development Plan for the SG E34 496, SG L796 and SG F22 496, Environmental Assessment and Decision Record, DOI-BLM-CO-2013-0035-EA, 2013.	White River Field Office, BLM	When water quality may allow the propagation of mosquitoes, then fresh water storage pits would be treated with biological mosquito controls (from June through September).
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Produced water and completion flowback water is separated from the oil and gas and stored in tanks. The water is then either trucked (if no pipeline is present) or piped to private underground injection wells, commercial underground injection wells, or commercial evaporation pond facilities.
EOG. EA for 4 Applications for Permit to Drill (APDs & ROWs) in Jackson County. DOI-BLM-CO-120-2009-0003. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	Two of the four wells would use a closed loop system.
EOG. Environmental Assessment for Spicer 3-32H and Surprise 2-05H Applications for Permits to Drill (APDs) in Jackson County. CO-120-08-42-EA. Bureau of Land Management Kremmling Field Office. 2008.	Kremmling Field Office, BLM	The Surprise Well (02-05H) would not have a reserve pit, but be a closed system.

Citation	Field Office	Description
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	It will be the responsibility of the operator to effectively preclude migratory bird access to, or contact with, reserve pit contents that possess detrimental properties (i.e., through ingestion or exposure) or have potential to compromise the water-repellent properties of birds' plumage. Exclusion methods may include netting, the use of "bird-balls," or other alternative methods that effectively eliminate migratory bird contact with pit contents and meet BLM's approval.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Manage produced water to reduce the spread of West Nile virus within sage-grouse habitat areas. Implement the following impoundment construction techniques and measures to eliminate water sources that support breeding mosquitoes: Overbuild the size of ponds to accommodate a greater volume of water than is discharged. This will result in non-vegetated and muddy shorelines that breeding mosquitoes avoid. Build steep shorelines to reduce shallow water and aquatic vegetation around the perimeter of impoundments. Construction of steep shorelines also will increase wave action that deters mosquito production. Maintain the water level below rooted vegetation for a muddy shoreline that is unfavorable habitat for mosquito larvae. Rooted vegetation includes both aquatic and upland vegetative types. Always avoid flooding terrestrial vegetation in flat terrain or low-lying areas. Use a horizontal pipe to discharge inflow directly into existing open water, thus precluding shallow surface inflow and accumulation of sediment that promotes aquatic vegetation. Fence pond site to restrict access by livestock and other wild ungulates that trample and disturb shorelines, enrich sediments with manure, and create hoof-print pockets of water that are attractive to breeding mosquitoes. Use adulticides to target adult mosquito populations and larvicides to control the hatching of mosquito larvae, using approved pesticides and utilizing licensed applicators with a Pesticide Use Plan.
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	The proper installation of netting or other deterrents as directed by AO will be required to exclude wildlife (including raptors, birds, and bats) from evaporative basins (or reserve pits as needed).
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Reserve, workover, and evaporation pits and other areas that contain hydrocarbons would be adequately protected to prevent access by migratory birds and other wildlife.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Bird exclusion netting will be installed over reserve pits containing water and left open for more than 30 days in order to eliminate migratory bird and bat exposure to potentially toxic drilling fluids.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	The Companies will locate impoundments to avoid sagebrush shrublands, where practical. Containment impoundments will be fenced to exclude wildlife and livestock. If they are not fenced, they will be designed and constructed to prevent entrapment and drowning.
Lance Oil & Gas Inc., Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape. See Idaho BLM Technical Bulletin 89-4 entitled Wildlife Watering and Escape Ramps on Livestock Water Developments: Suggestions and Recommendations.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Because of the reviews of the protest letters, one additional mitigation measure has been included relative to West Nile Virus. The BLM will consult with appropriate state and county agencies regarding West Nile Virus. If determined to be necessary, a condition of approval would be applied at the time of APD approval to control for mosquitoes where CBM discharge waters that become stagnant.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	Pits containing harmful fluids shall be maintained in a manner to prevent migratory bird mortality.
QEP. APD and COAs for QEP Stewart Point 14-32 pad. 2013.	Pinedale Field Office, BLM	The operator shall utilize closed drilling systems (no reserve pit) for all wells.
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	Pits containing harmful fluids shall be maintained in a manner to prevent migratory bird mortality.
QEP. APD with COAs for QEP Mesa 15-9 pad. 2012.	Pinedale Field Office, BLM	The operator shall utilize closed drilling systems (no reserve pit) for all wells.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	Reserve pits shall be fenced to prevent sage-grouse entry and potential mortality.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape. See Idaho BLM Technical Bulletin 89-4 entitled Wildlife Watering and Escape Ramps on Livestock Water Developments: Suggestions and Recommendations.



<b>Citation</b>	<b>Field Office</b>	<b>Description</b>
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	All impoundments approved in this authorization will be treated each year to kill mosquito larvae.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	All stock tanks shall include a ramp to enable trapped small birds and mammals to escape.

**APPENDIX L**  
**Timing Limitations**

**Table L-1. PECE Policy Evaluation – Timing Limitations**

Conservation Measure	Timing Limitations
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

<b>Conservation Measure</b>	<b>Timing Limitations</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Timing limitation COAs and conservation measures address threats associated with Energy Development under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Timing for implementation of restrictions is explicitly stated in each NEPA document. These are implemented annually for the life of the project.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include avoidance of activities surrounding leks within given distance buffers during certain times of the day.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Lek attendance monitoring, monitoring of nesting and brood-rearing hens, etc. provide quantifiable parameters to measure success of the measure. Multiple sources identify that avoidance of activities surrounding leks during lekking, nesting, and early brood-rearing periods provide conservation benefit and protective measures for sage-grouse.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Annual lek counts are tracked by state game and fish agencies and federal land management agencies for purposes of evaluating grouse populations. Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

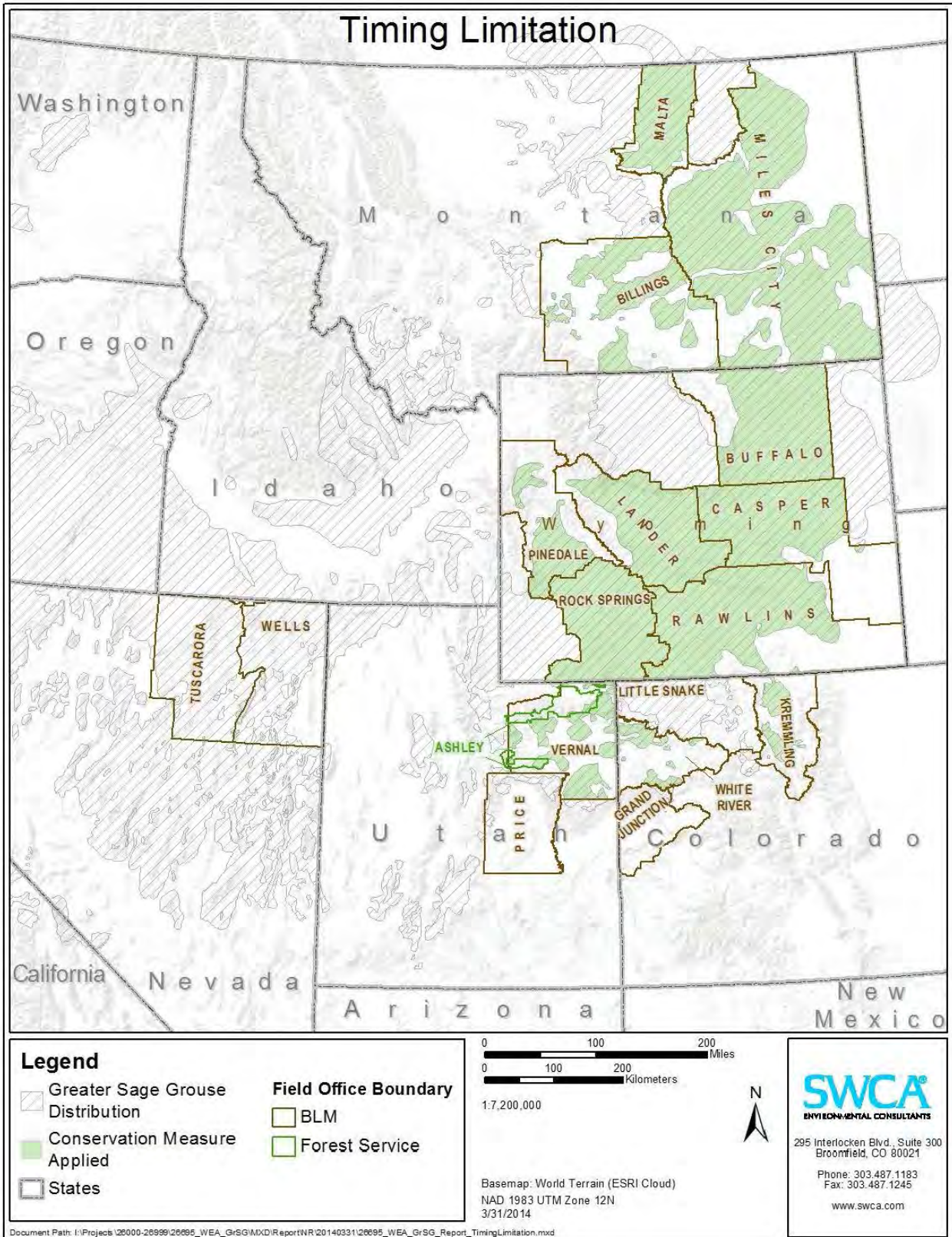


Figure L-1. Map of FOs where Timing Limitation COAs are applied.

**Table L-2. Timing Limitation COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Company, Powder River 2D Seismic Survey Environmental Assessment (EA), WY-070-EA11-343 Buffalo Field Office, Bureau of Land Management, 2011.	Buffalo Field Office, BLM	Should geo-exploration activities extend into sage-grouse breeding season (March 1 – June 15), timing restrictions will be placed on activities within 2 miles of identified leks and in core/connectivity areas.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Human activity will be avoided between 6:00 p.m. and 9:00 a.m. from March 1 to May 20 within one-quarter mile of the perimeter of occupied leks.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest , USFS	To reduce potential disturbance to strutting birds (and the likelihood of lek abandonment), timing restrictions will be required during the breeding season (March 1–May 31) within sage-grouse habitat, and within 0.6 mile of sage-grouse habitat. No project-related vehicles or activities (including routine maintenance, production vehicles, or work-over rigs) will be allowed, from 1 hour before sunrise to 3 hours after sunrise, and from 2 hours before sunset to 1 hour after sunset.
Bill Barrett Corporation, Merganser 3-Dd Seismic Project. Categorical Exclusion WY-070-CX12-197. 2012.	Buffalo Field Office, BLM	In greater sage grouse lek areas, crew will only work within 0.25 mile of such lek between 10am and 3pm with foot traffic only off of existing roads and trails
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	If possible, minimize maintenance and related activities in sage grouse breeding/nesting complexes; 15 March -15 June, between the hours of 4:00-8:00 am and 7:00-10:00 pm.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Disruptive activity is restricted on or within six tenths (0.6) mile radius of the perimeter of occupied sage-grouse leks from 6 pm to 8 am from March 1 to May 15.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	New noise level, at the perimeter of a lek, should not exceed 10dBA above ambient levels from 6pm to 8am during the initiation of breeding (March 1 to May 15).
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	A 0.6 mile radius "No Disturbance" buffer would be applied around active lek sites (documented activity within the last 5 years) from 5:00 a.m. to 9:00 a.m., March 15th through May 15th.
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	In occupied sage-grouse habitat well site visitation would be restricted to occur between the hours of 9:00 a.m. and 4:00 p.m. during the lekking season (March 15th to May 15th).
EnCana Oil and Gas. Master Development Plan (MDP) for the SG E34 496, SG L27 796 and SG F22 496. DOI-BLM-CO-110-2013-0035-EA. Approved 6/7/13 by the White River Field Office.	White River Field Office, BLM	Where practicable, traffic and other disturbances would be restricted after sunset when sage-grouse are congregating around the lek until 9:00 a.m. the following morning when birds depart the lek site.
Environmental Assessment for East Converse Exploratory Oil and Gas Development Project. WY-060-EA12-227. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Disruptive activities are restricted within ¼-mile radius of occupied or undetermined sage-grouse leks from 6 pm to 8 am from March 1 to May 15.
Environmental Assessment for Highland Loop Road Exploratory Oil and Gas Development Project. WY-060-EA12-226. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Disruptive activities are restricted within one quarter (0.25) mile radius of occupied or undetermined sage-grouse leks from 6 pm to 8 am from March 1 – May 15.
Environmental Assessment for Spearhead Ranch Exploratory Oil and Gas Development Project. Y-060-EA12-225. Approved 11/20/12 by BLM Casper Field Office.	Casper Field Office, BLM	Disruptive activities are restricted within one quarter (0.25) mile radius of occupied or undetermined sage-grouse leks from 6 pm to 8 am from March 1 – May 15.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Daily timing restrictions will include no activity before 9:00 am or after 4:00 pm in sage-grouse nesting and brood-rearing areas. Additional timing restrictions could be imposed based on results of pre-construction surveys.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Limit vehicular traffic and human visitation to well sites and facilities within ¼ mile of lek sites until after 9:00 a.m. daily during the production phase.

Citation	Field Office	Description
Gasco Energy Inc. Uinta Basin Natural Gas Development Project, Environmental Impact Statement FES 12-5, Record of Decision, Bureau of Land Management Vernal Field Office, June 2012.	Vernal Field Office, BLM	Workover visits will be limited to the hours between 9:00 a.m. and 5:00 p.m. during breeding season (March 1–June 30) within 2 miles of active leks
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming, 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Surface disturbance and occupancy will be prohibited within 0.25 mile of the perimeter of greater sage-grouse leks, and human activity in these areas will be avoided between 8 p.m. and 8 a.m. from March 1 through May 15.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	Within 2 miles of an active greater sage-grouse lek during the breeding season (February 15 through June 15), construction and operational activities will be avoided at dawn (sunrise to 9:00 a.m.) and dusk (5:00 p.m. to sunset) when birds are likely to be on a lek.
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	Disruptive activity is restricted on or within a 0.25 mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6:00 pm to 8:00 am from March 15-May15. “Disruptive activities are those that “...require people and/or activity to be in nesting habitats for a duration of 1 hour or more during a 24 hour period...” (BLM 2009).
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	Disruptive activity is restricted on or within one quarter (0.25) mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6 pm to 8 am from March 15-May 15.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	Disruptive activity is restricted on or within a 0.25 mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6:00 pm to 8:00 am from March 15-May15. “Disruptive activities are those that “...require people and/or activity to be in nesting habitats for a duration of 1 hour or more during a 24 hour period...” (BLM 2009).
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	Disruptive activity is restricted on or within a 0.25 mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6:00 pm to 8:00 am from March 15-May15. “Disruptive activities are those that “...require people and/or activity to be in nesting habitats for a duration of 1 hour or more during a 24 hour period...” (BLM 2009)
Samson. Endurance/Barricade Gas Infrastructure Project Sweetwater County, Wyoming. Environmental Assessment. DOI-BLM-WY-030-2013-0151-EA. August 2013	Rawlins Field Office, BLM	Disruptive activities are prohibited between 6pm-9am, March 1-May 20 on and within one-quarter mile of lek.
Wellstar. EA for Applications for Permits to Drill (APDs) Bush Draw Federal 18-1 and 3-2 in Jackson County. DOI-BLM-CO-120-2009-0057-EA. Bureau of Land Management Kremmling Field Office. 2009.	Kremmling Field Office, BLM	In order to prevent disturbing breeding greater sage-grouse during their breeding season, no nonemergency traffic should use JCR 23A road between 6pm and 9am during the peak lek attendance, March 1 to May 30.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	Well metering, maintenance and other site visits within 0.5 miles of documented sage grouse lek sites shall be minimized as much as possible during the breeding season (March 1– June 15), and restricted to between 0900 and 1500 hours.
Yates Petroleum and Pinnacle Gas Resources. Luman Rim Natural Gas Development EA and DR. WYW128688. WY-040-EA10-139. December 2010.	Rock Springs Field Office, BLM	TLS for Sage-grouse Leks March 1 – May 15 between 8 pm and 8 am; Sage-grouse brood rearing March 15 – July 15; Sage-grouse identified winter habitat Nov. 15 – March 15.
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	Disruptive activity is restricted on or within a 0.25 mile radius of the perimeter of occupied or undetermined sage-grouse leks from 6:00 pm to 8:00 am from March 15-May15. “Disruptive activities are those that “...require people and/or activity to be in nesting habitats for a duration of 1 hour or more during a 24 hour period...” (BLM 2009). This condition applies to the Christensen Ranch 1 sage-grouse leks located within 0.25 mile of the access road passing through Section 19.

**APPENDIX M**  
**Vegetation Treatments**



**Table M-1. PECE Policy Evaluation – Vegetation Treatments**

Conservation Measure	Vegetation Treatments
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

<b>Conservation Measure</b>	<b>Vegetation Treatments</b>
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Vegetation treatment and fire management COAs and conservation measures address threats associated with pinyon-juniper encroachment, invasive plants, and fire under Listing Factor A.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	The objectives and timing are explicitly stated in each NEPA document and associated habitat improvement plans.
The steps necessary to implement the conservation effort are identified in detail.	Steps are identified and include removal of encroaching pinyon and juniper and steps to enhance sage-grouse habitats. Fire Prevention and Management Plans detail the steps necessary for implementation.
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Success is quantified by the number of acres pinyon juniper is reduced, and the number of acres sagebrush and other habitats are enhanced. Decreased or stable fire frequency can be easily measured.
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Project monitoring includes lek attendance monitoring, monitoring for use in treated areas, and monitoring for re-encroachment of undesirable vegetation. State and Federal agencies track fire frequency.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.

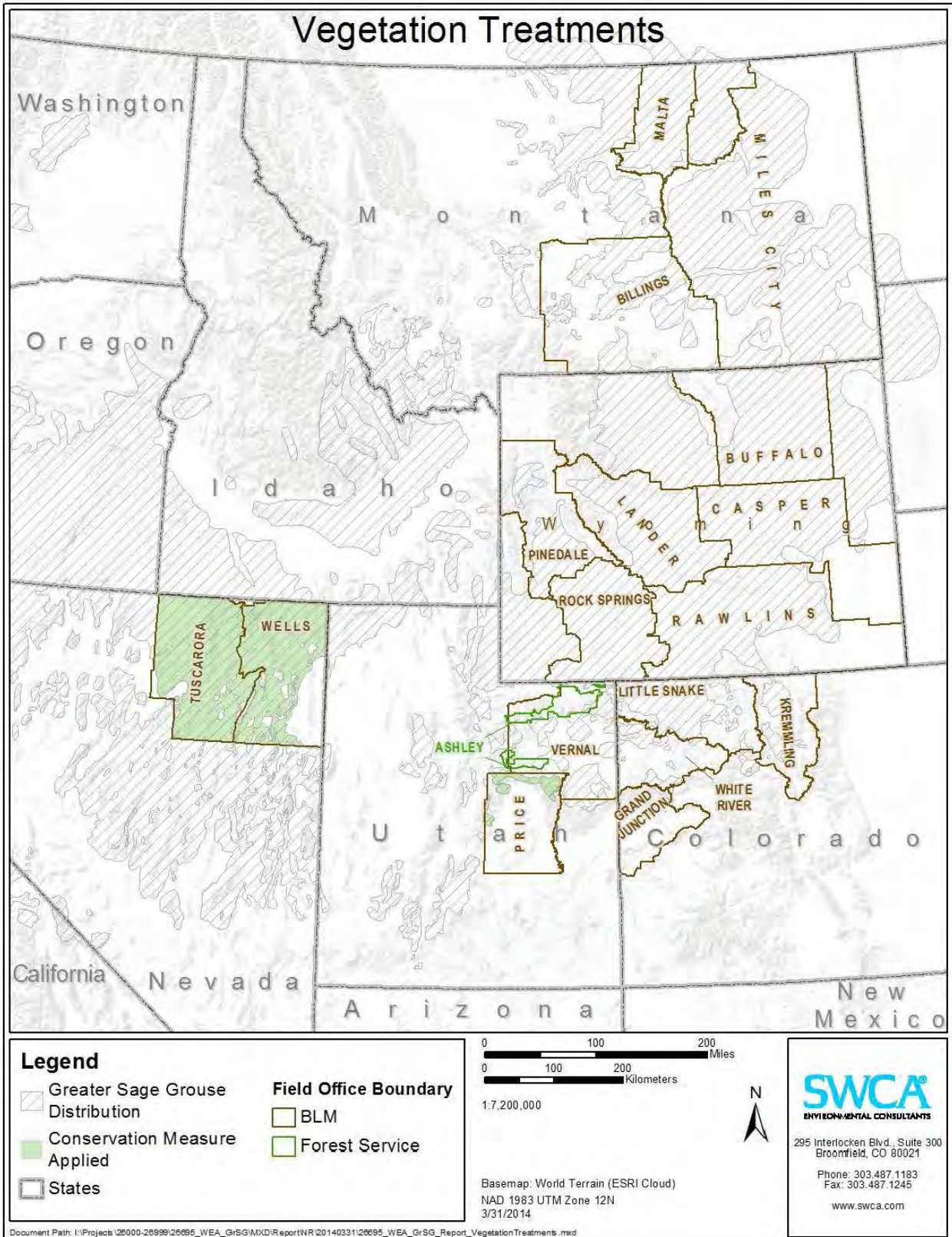


Figure M-1. Map of FOs where Vegetation Treatment COAs are applied.

**Table M-2. Vegetation Treatment COAs and Conservation Measures**

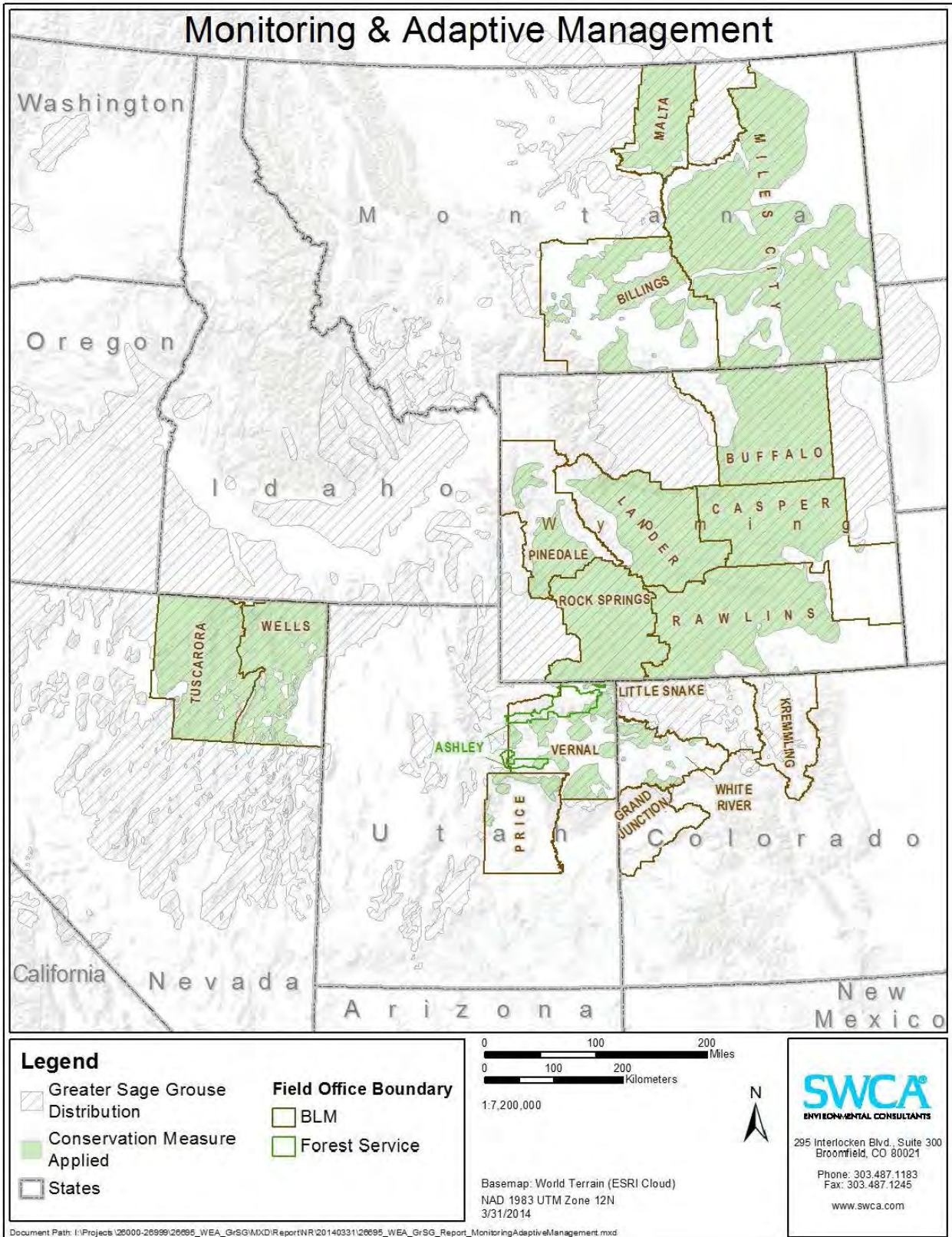
Citation	Field Office	Description
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Habitat improvement and connectivity projects designed to remove encroaching pinyon and juniper (e.g., lop and scatter) and increase the sagebrush park size to benefit sage grouse (This will be implemented at a 4:1 ratio as indicated above.)
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	Wet meadow/summer range enhancement projects designed to increase this type of habitat for sage-grouse brood survival. Up to six projects will be implemented. Acres enhanced will be counted under the habitat improvement tally at an equal or greater acreage value based on the qualitative benefits of the enhancement.
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM	Due to the sensitive nature of the sagebrush habitat in the project area and the past history of fire impacts to grazing and sage-grouse, Noble would prepare and implement a Fire Prevention Plan.
Noble. Marys River 3D Seismic Project. DOI-BLM-NV-E030-2012-0518-EA. Elko District – Wells Field Office. August 2012.	Wells Field Office, BLM	Due to the sensitive nature of the sagebrush habitat in the project area and the past history of fire impacts to grazing and sage-grouse, Noble will prepare and implement a Fire Prevention Plan.

**APPENDIX N**  
**Monitoring and Adaptive Management**

**Table N-1. PECE Policy Evaluation – Monitoring and Adaptive Management**

Conservation Measure	Monitoring and Adaptive Management
<b>Certainty of Implementation</b>	
The conservation effort, the party(ies) to the agreement or plan that will implement the effort, and the staffing, funding level, funding source, and other resources necessary to implement the effort are identified.	The BLM/USFS decision records require implementation as a condition of the agency authorization. Funding and implementation is generally identified as the responsibility of the operator(s).
The legal authority of the party(ies) to the agreement or plan to implement the formalized conservation effort, and the commitment to proceed with the conservation effort are described.	NEPA provides the legal and statutory authority to implement the conservation measures and COAs included in the agency decision records.
The legal procedural requirements (e.g. environmental review) necessary to implement the effort are described, and information is provided indicating that fulfillment of these requirements does not preclude commitment to the effort.	NEPA is the legal procedural requirement necessary to implement COAs and conservation measures included in the agency decision records.
Authorizations (e.g., permits, landowner permission) necessary to implement the conservation effort are identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the effort will obtain these authorizations.	The NEPA decision record provides the necessary authorization to implement the COAs and conservation measures. As the measures are conditions of the agency approval and are required for project completion, there is a high level of certainty that they will be implemented and authorized.
The type and level of voluntary participation (e.g., number of landowners allowing entry to their land, or number of participants agreeing to change timber management practices and acreage involved) necessary to implement the conservation effort is identified, and a high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain that level of voluntary participation (e.g., an explanation of how incentives to be provided will result in the necessary level of voluntary participation).	Participation in the implementation of the COAs and conservation measures is mandatory as a condition of the agency approval under NEPA. NEPA authorizations exceed this evaluation criteria by making the measures mandatory.
Regulatory mechanisms (e.g., laws, regulations, ordinances) necessary to implement the conservation effort are in place.	NEPA provides the regulatory mechanism for implementation. Where necessary, other federal or state authorizations or permits might be required prior to implementation (i.e., Clean Water Act permits). There is reasonable certainty that these permits will be obtained for each measure or COA.

<b>Conservation Measure</b>	<b>Monitoring and Adaptive Management</b>
A high level of certainty is provided that the party(ies) to the agreement or plan that will implement the conservation effort will obtain the necessary funding.	The agency decision requires that funding for the COAs and conservation measures be provided as a condition of the project approval. There is certainty that each measure will be funded.
An implementation schedule (including incremental completion dates) for the conservation effort is provided.	Each NEPA document and associated decision record analyzes and describes the schedule for project implementation. As conditions of agency approvals, COAs and conservation measures must be completed during or prior to project completion.
The conservation agreement or plan that includes the conservation effort is approved by all parties to the agreement or plan.	As a condition of the agency approval of each project, there is agreement between the operators and the agency that each COA or conservation measure will be implemented as part of project activities.
<b>Certainty of Effectiveness</b>	
The nature and extent of threats being addressed by the conservation effort are described, and how the conservation effort reduces the threats is described.	Monitoring and Adaptive Management COAs and conservation measures address threats associated with Energy Development and Infrastructure under Listing Factor A; Disease and Predation under Factor C; and Contaminants under Factor E.
Explicit incremental objectives for the conservation effort and dates for achieving them are stated.	Implementation of Monitoring and Adaptive management typically occurs annually for the life of the project. Objectives are to document the success of mitigation measure and to adjust the approach if mitigation is not successful.
The steps necessary to implement the conservation effort are identified in detail.	Adaptive management plans generally outline steps to be taken including regular meetings of Technical Advisory Committees or other similar stakeholder groups to review progress and identify additional actions
Quantifiable, scientifically valid parameters that will demonstrate achievement of objectives, and standards for these parameters by which progress will be measured, are identified.	Monitoring quantifies various parameters in order to determine if the objectives of mitigation measures have been achieved based on standards described in a monitoring plan (number of grouse on leks, % cover of vegetation, etc.)
Provisions for monitoring and reporting progress on implementation (based on compliance with the implementation schedule) and effectiveness (based on evaluation of quantifiable parameters) of the conservation effort are provided.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.
Principles of adaptive management are incorporated.	Monitoring and adaptive management practices discussed in detail in the report provide examples of additional monitoring and reporting provisions.



**Figure N-1. Map of FOs where Monitoring and Adaptive Management COAs are applied.**



**Table N-2. Monitoring and Adaptive Management COAs and Conservation Measures**

Citation	Field Office	Description
Anadarko Petroleum Corp. Big Corral Jewel Draw Unit Gamma EA # WY-070-EA08-168 Buffalo Field Office, Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage-grouse breeding activity during the sage-grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Anadarko Petroleum Corporation, Double Tank Phase II POD EA, WY-070-07 015, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	Sage-grouse surveys are required throughout the project area for the current breeding season and results reviewed by a BLM biologist. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Anadarko Petroleum Corporation, Dry Willow III POD EA, WY-070-08-036, Buffalo Field Office Buffalo, Wyoming, 2009.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Anadarko/Lance Oil & Gas. Rose Draw Unit Beta Environmental Assessment WY-070-EA08-186, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	WILDLIFE MONITORING AND PROTECTION PLAN. The goal of the plan is to avoid and/or minimize adverse impacts to wildlife present on project-affected areas by monitoring wildlife population trends on the ARNG during the course of project development and operations and by developing appropriate mitigation actions.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Greater sage-grouse/Columbian sharp-tailed grouse lek inventories will be conducted by the BLM and Wyoming Game and Fish Department (WGFD) or by a BLM-approved operator-financed biologist on the project area and a two mile/one mile buffer to determine lek locations every 5 years, or as deemed appropriate by the BLM.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	Operators will complete draft annual reports for submittal to the Review Team by November 15 of each year. Annual reports will summarize annual wildlife inventory and monitoring results, note any trends across years, identify and assess protection measures implemented during past years, specify monitoring and protection measures proposed for the upcoming year, recommend modifications to the existing wildlife monitoring/protection plan based on the successes and/or failures of past years, and identify additional species/categories to be monitored.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	The BLM will use a performance-based management approach as part of the adaptive management process. The BLM will attempt to achieve the following Performance Goals in collaboration with other state and other federal agencies: provide well-dispersed sage-grouse breeding, nesting, brood rearing, and winter habitat. As part of the annual planning process, a monitoring and mitigation process will be required, and its development will begin within 30 days of the effective date of the ROD. This information should be reviewed at least annually with development plans modified based on trends.
Atlantic Rim Natural Gas Field Development Project Record of Decision and Environmental Impact Statement, Carbon County, Wyoming. March 2007.	Rawlins Field Office, BLM	The planning, review, and approval process for project implementation is described below. This process will typically be initiated by the Operators through an annual planning meeting with the Rawlins Field Office Manager, where they will outline detailed development plans for the upcoming year and a conceptual multi-year plan. The BLM (including interdisciplinary team members), cooperating and interested agencies, and the Operators will make up a Review Team to evaluate annual and site-specific development proposals and monitoring reports. The review and approval process will include a site-specific visit by the Review Team, applicable environmental review and establishing required BMPs, conditions of approval, or other protective measures to mitigate potential environmental impacts.
Berry Petroleum Company. Record of Decision South Unit Oil and Gas Development Final Environmental Impact Statement Duchesne Ranger District, Ashley National Forest Duchesne County, Utah. 2012.	Ashley National Forest, USFS	Develop a Wildlife Monitoring Plan
Bill Barrett Corporation, Beaver Creek Add II, Beaver Creek Add II SGP PODs, Beaver Creek Little Buffalo 32-24 APD & Beaver Creek Little Buffalo 34-24 APD, EA # WY-070-09-065, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	A sage-grouse lek survey of the area within four miles of the project will be conducted by a biologist following the most current WGFD protocol to determine status of known leks and locations of new leks. All survey results shall be submitted in writing to a BLM biologist.

Citation	Field Office	Description
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	BLM will apply wildlife mitigation measures consistent with adaptive management practices as necessary to achieve its resource objectives. Annual report on sage-grouse winter use monitoring to determine the effectiveness of sage-grouse mitigation and to provide useful information for potentially modifying the winter drilling exceptions through the adaptive management process.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	The agency mitigation plan will also establish a mitigation oversight committee (MOC) to be led by the BLM, in coordination with UDWR, SITLA, other agencies, and the operators. The WTP MOC will include, or at least invite to participate, a representative from a local sage-grouse working group, any potential affected private landowners, and representatives from Carbon and Duchesne Counties. The WTP MOC will complete evaluations and make determinations on on-going and planned mitigation activities on an annual basis, in advance of considerations for winter activities (as is outlined in the ROD), and prepare a report on its findings.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	As part of this plan, BBC and other operators will be required to mitigate impacts to wildlife on a 4:1 acre ratio based on total potential long-term surface disturbance. Under the plan, 30 percent of the total potential long-term surface disturbance (estimated to be approximately 685 acres) will be mitigated during the first 3 years of the development phase.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	In order to mitigate the impacts of winter drilling, BBC has included a detailed Wildlife Mitigation Plan as part of their Proposed Action. The goal of BBC's Wildlife Mitigation Plan is to improve habitats for sage-grouse, mule deer, elk, and raptors in an effort to offset the effects of winter drilling and other potential impacts of the project. The BLM and UDWR have also included an Agency Wildlife Mitigation Plan. The agencies' alternative mitigation plan emphasizes the importance of offsetting, to the extent reasonable, the effects of the full field development in its entirety. The agencies' plan gives priority to compensating for potential impacts to greater sage grouse, deer, elk, and raptors.
Bill Barrett Corporation. Environmental Impact Statement (UT-070-05-055) for West Tavaputs Plateau Natural Gas Full Field Development Plan and ROD. 2010.	Price Field Office, BLM	The operators will contribute to UDWR for monitoring greater sage-grouse, whether the continued telemetry study or other, more aggressive means of monitoring, if necessary, including experimental designs.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Aerial surveys will be used for determining lek locations. BLM, MFWP or BLM-approved Operator-financed biologist will monitor sage grouse lek attendance within 2 miles of areas having < 4 locations per section such that all leks on these areas are surveyed at least once every 3 years. Data collected during these surveys will be recorded on BLM and MFWP approved data sheets and entered into the BLM GIS database. An effort should also be made to compare trends of the number of males/lek to reference leks.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	BLM and MFWP will conduct sage grouse lek inventories over the BLM planning area every 5 years to determine lek locations. Surveys of different areas may occur during different years with the intent that the entire area will be covered at least once every 5 years. If BLM notes a downward trend, mitigation, such as extension of timing restrictions, could occur.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	BLM and MFWP will conduct sage grouse lek inventories over the entire CBM project area every 5 years to determine lek locations. Surveys of different areas may occur during different years with the intent that the entire CBM project area will be covered at least once every 5 years.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Downward trend in habitat occupancy would trigger management such as extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation...
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Downward trend in lek attendance would trigger management such as extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation...
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Downward trend in winter habitat occupancy or quality caused by oil and gas activities would trigger management such as extension of timing and/or increase in distance from lek; stipulations or conditions of approval; off-site habitat management/mitigation...
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Region 7 trend blocks will be monitored annually. There are 4 trend blocks in FWP Region 7; one located in the Decker area and 3 others across the Region. Inventories and protocol will be consistent with the Montana Sage Grouse Conservation Plan coordinated by the BLM and MFWP. In areas with > 4 well locations per section, aerial inventories will be conducted annually on affected sections, 2 mile buffers, and selected undeveloped reference areas. Surveys may be conducted aerially or on the ground, as deemed appropriate by the BLM and MFWP. Operator may provide financial assistance.
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Sage grouse lek attendance monitoring on and within 2 miles of the RMU, annually. BLM with MFWP & operator assistance will visit selected leks each year so that all leks will be visited at least once over a 3 year period.

Citation	Field Office	Description
BLM Montana. Record of Decision for the Final Statewide Oil and Gas Environmental Impact Statement and Proposed Amendment of the Powder River and Billings Resource Management Plans. 2003.	Billings Field Office, BLM Miles City Field Office, BLM	Sage grouse winter use surveys of suitable winter habitat within 2 miles of a project area will be coordinated by the BLM and implemented by the BLM and/or MFWP during November through February as deemed appropriate by these management agencies, and results will be provided in interim and/or annual reports. These surveys will be conducted to identify sage grouse wintering concentration areas. Historical information of winter sage grouse locations will be useful in focusing efforts in areas suspected of providing winter habitat. Sage grouse winter habitat use surveys will be conducted subsequent to snowfall events to identify crucial winter habitat.
Cimarex. Rands Butte Gas Development Project Final Environmental Assessment, Decision Record and Finding of No Significant Impact, WY-100-EA09-43. 2010.	Pinedale Field Office, BLM	Pre-construction surveys to verify locations of occupied leks and to identify the presence of other leks within 0.5 mile of proposed pipeline and transmission line alignments.
Coleman Oil & Gas. Wilkinson POD. EA # WY-070-11-38. 2010.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities. The Companies will locate compressor stations so that noise from the stations at any nearby sage grouse or sharp-tailed grouse display grounds does not exceed 49 decibels (10 dBA above background noise) at the display ground.
Coleman Oil & Gas. Wilkinson POD. EA # WY-070-11-38. 2010.	Buffalo Field Office, BLM	If an active lek is identified during the survey, the 2 mile timing restriction (March 15-June 30) will be applied, and surface disturbing activities will not be permitted until after the nesting season. The required sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
Devon Energy Production Company L.P. Harrier Plan of Development Juniper Draw Unit Environmental Assessment WY-070-EA08-189. 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Devon Energy Production Company, L.P., Golden Eagle- Juniper Draw CBNG Field POD EA, WY-070-EA07-111, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Devon Energy Production Company. West Pine Tree Unit – Brook Trout POD Environmental Assessment WY-070-EA08-129, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage-grouse breeding activity during the sage-grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Double Eagle Petroleum. Catalina PODs E and F in the Atlantic Rim. DOI-BLM-WY-030-2009-0155-EA. 2011.	Rawlins Field Office, BLM	Monitoring within the project area includes shrub dependent song birds, reclamation, Muddy Creek and its sensitive fish, Greater Sage-grouse and mule deer. Monitoring activities are prioritized and implemented as the need and funding allow. Monitoring results are evaluated and used by BLM and its cooperators to determine if adaptive management activities are necessary to reduce or mitigate adverse effects. This process is envisioned to continue for the life of the project including final reclamation.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Be willing to use adaptive management if declines on affected leks are observed and are attributed to the proposed project.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Coordinate with the WGFD to determine lek monitoring needs and what data should be reported.
Elk Petroleum. Environmental Assessment for the Grieve Unit CO2 Enhanced Recovery Project. Natrona County, Wyoming. WY-050-EA11-108. Approved 7/26/12 by BLM Lander Field Office.	Lander Field Office, BLM	Greater sage-grouse aerial surveys were conducted over the project area in April and May 2011 in an effort to determine use of the area by the species.

Citation	Field Office	Description
EnCana Oil and Gas. 28 APDs on new well pad D36 496. DOI-BLM-CO-110-2011-0169-EA. Approved 9/23/11 by the White River Field Office.	White River Field Office, BLM	In an effort to accommodate existing lease rights and maintain viable populations of sage-grouse in development areas, a cooperatively developed pilot strategy is being employed that attempts to exploit the strong fidelity of adult sage-grouse to previously used reproductive habitats, tempered by considerations for the average 4-5 year life-span of sage-grouse and the propensity of yearling grouse to abandon areas disturbed by natural gas development. By allowing concentrated development pressure in pre-defined subunits of a subpopulation for a period not to exceed three consecutive breeding seasons, and then vacating that subunit of all possible activity for no less than two consecutive breeding seasons, it is hoped that one or two years' recruitment associated with resident adult birds would allow those broods to develop sufficient site fidelity to perpetuate occupation and reproductive use of that subunit. The proposed location is thought to carry few birds and represents relatively low risk in testing the efficacy of this development strategy. This strategy, as applied to the applicant's leases in the PPR population area, is addressed in an existing agreement between EnCana and CPAW. The agreement also incorporates a number of applicant-committed grouse management measures that constrains construction and maintenance/operation activities to less critical timeframes and, where possible, uses extraordinary means to avoid grouse habitat altogether.
EnCana Oil and Gas. Story Gulch Well Pads (2). DOI-BLM-CO-110-2009-0229-EA. Approved 2/3/10 by White River Field Office.	White River Field Office, BLM	In an effort to accommodate existing lease rights and maintain viable populations of sage-grouse in development areas, a cooperatively developed pilot strategy is being employed that attempts to exploit the strong fidelity of adult sage-grouse to previously used reproductive habitats, tempered by considerations for the average 4-5 year life-span of sage-grouse and the propensity of yearling grouse to abandon areas disturbed by natural gas development. By allowing concentrated development pressure in pre-defined subunits of a subpopulation for a period not to exceed 3 consecutive breeding seasons, and then vacating that subunit of all possible activity for no less than 2 consecutive breeding seasons, it is hoped that 1 or 2 years' recruitment associated with resident adult birds would allow those broods to develop sufficient site fidelity to perpetuate occupation and reproductive use of that subunit. The subunit now being considered (Story 2) consists of approximately 4,000 acres in the upper watershed of West and Middle Forks of Story Gulch extending south from the Garfield County line. As alluded to above, this subunit is thought to carry few birds and represents relatively low risk in testing the efficacy of this development strategy. This strategy, as applied to the applicant's leases in the PPR population area, is addressed in an existing agreement between EnCana and the CDOW. During on-site inspections and a subsequent meeting with the applicant, certain recommendations offered by BLM and CDOW biologists were incorporated as amendments to this agreement (i.e., activity timing and feature design and location).
EnCana Oil and Gas. APDs- N22-496 (16)& P28-496 (16). DOI-BLM-CO-110-2011-0006-EA. White River Field Office. Approved 5/24/11 by White River Field Office.	White River Field Office, BLM	An EnCana initiative, and one endorsed by CDOW and WRFO, the development designs for multi-well pads and centralized production facilities in the valley bottoms were undertaken specifically as a means to avoid habitat and behavioral impacts to sage-grouse. Although not avoiding the potential for adverse grouse response altogether, under these circumstances, these development patterns and timeframes effectively balance a number of desirable sage-grouse oriented objectives, including avoiding short and long term modification and occupation of suitable sage-grouse habitat, reduced disruption of sage-grouse reproductive activities, reduced surface density of development features, and reduced frequency of vehicle traffic during the decades-long production phase. This development strategy is consistent with wildlife management agreements arranged between EnCana and the CDOW.
EnCana Oil and Gas. L24 496 New Well Pad - 28 APDs. DOI-BLM-CO-110-2012-0021-DNA. Approved 3/20/12 by White River Field Office.	White River Field Office, BLM	Consistent with EnCana-Colorado Parks and Wildlife (CPW) wildlife mitigation plan and in coordination with the WRFO the applicant has confined operations to this range fringe for the last several years and has incorporated design features and BMPs that minimize short and long-term declines in habitat availability and reduces the frequency and intensity of behavioral impacts on birds that continue to use this ridgeline.
EnCana Oil and Gas. Pappy Draw Exploratory Coal-bed Natural Gas Pilot Project Environmental Assessment. WY-050-EA08-88. Approved 9/5/08 by the Lander BLM Field Office.	Lander Field Office, BLM	Appropriate clearance surveys would be conducted for special status species before construction activities begin. If threatened, endangered, candidate, or proposed species are discovered at any time during construction, all construction activities would be stopped and the BLM would be immediately notified. Work would not resume until a Notice to Proceed is issued by the BLM.
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	Wildlife Research Cooperative Agreement: Effective May 1, 2010, a cooperative agreement among CPW, Colorado State University, and XTO was executed to jointly research: 1. The potential effects of hydrocarbon development and extraction on wildlife and their supporting habitat, and 2. The most efficient mitigation measures to reduce identified impacts on wildlife and associated habitat. XTO's sponsorship of ongoing and future studies under this cooperative agreement will produce a better understanding of oil and gas production potential effects on wildlife, particularly big game, and the development of effective mitigation measures that can minimize the effects of oil and gas activity on wildlife and their habitats in Piceance Basin.

Citation	Field Office	Description
Exxon. North Hatch Gulch Project Environmental Assessment, DOI-BLM-CO-110-2010-0200-EA, 2012.	White River Field Office, BLM	Wildlife Mitigation Plan: In May 2008, XTO, BLM, and the Colorado Parks and Wildlife (CPW) initiated in discussions regarding future development plans in the Piceance Basin, potential mitigations to reduce environmental impacts to wildlife, and strategies to obtain approval of year-round and continuous activities. The objective of the discussions was to develop a Wildlife Mitigation Plan (WMP) for XTO's leases. A WMP is one method approved by the Colorado Oil and Gas Conservation Commission (COGCC), under recent rule changes, to facilitate APD approvals by avoiding the need for individual well or well pad consultations with CPW for development in sensitive wildlife areas. The proposed WMP was intended to apply to CPW's administration of wildlife on approximately 150,000 acres of XTO leases, largely on federal surface, within the Piceance Basin. A final WMP was approved and signed by representatives of XTO and CPW in August 2010, but is effective as of July 1, 2010. A copy of the Plan has been included as Appendix A to this EA. The Plan indicates specific mitigations and Best Management Practices (BMPs) which XTO will use in its development activities within the covered leasehold. An important feature of the Plan is CPW's present support of XTO's year-round and continuous activities within XTO's 150,000-acre leasehold. XTO will meet with CPW on at least an annual basis to review the effectiveness of applied mitigation measures, revise these measures as necessary to ensure their efficiency, consistent with the principles of adaptive management, and provide an updated three-year development plan to CPW.
Exxon. Piceance Creek 3D Seismic Survey Project Environmental Assessment, CO-110-2008-036-EA, 2008.	White River Field Office, BLM	BLM biologists will be notified prior to beginning use of vibe trucks in the Magnolia area. BLM biologists will monitor initial use of vibe trucks and determine whether there is less impact to suitable habitat if the vibes travel in a single file line rather than staggered. A final decision on whether to stagger the vehicles in this area or to have them travel single file will be made after the initial demonstration.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	ExxonMobil will consider assisting BLM with sage-grouse presence surveys and habitat assessment in the sagebrush community adjacent to and surrounding the proposed locations of the CTF.
Exxon. Piceance Development Project EA, Finding of No Significant Impact and Decision Record, CO-110-2005-219-EA, 2007.	White River Field Office, BLM	Sage-grouse presence surveys and habitat assessment will be completed each spring prior to construction in areas of known sage-grouse activity or suitable habitat. BLM-approved biologists will be required to meet with BLM biologists prior to initiating surveys, and will conduct the surveys using BLM survey protocols.
Fidelity Exploration & Production Company. Bowdoin Natural Gas Development Project Phillips and Valley Counties, Montana. Environmental Assessment MT-92234-07-59. December, 2008.	Malta Field Office, BLM	Cooperation with Montana Fish, Wildlife and Parks and BLM biologists in their monitoring of greater sage-grouse and sharp-tailed grouse activity.
Fidelity Exploration & Production Company. Coal Bed Natural Gas Tongue River - Deer Creek North Federal Project. Environmental Assessment MT-020-2008-310. Finding of No Significant Impact and Decision Record, 2008.	Miles City Field Office, BLM	Fidelity Exploration & Production Company has committed to monitoring activity in their proposal; including: Sage and sharp-tailed grouse activity within two miles of development. See Monitoring Appendix of the 2003 MT EIS.
Fidelity Exploration and Production Company. Coal Bed Natural Gas Tongue River – Decker Mine East Federal Project. Finding of No Significant Impact and Decision Record. Environmental Assessment MT-020-2008-345. 2008.	Miles City Field Office, BLM	Fidelity Exploration & Production Company has committed to monitoring activity in their proposal; including: Sage and sharp-tailed grouse activity within two miles of development. See the Monitoring appendix of the 2003 MT EIS.
Fidelity Exploration and Production Company. Tongue River - Badger Hills Project Plan of Development EA, Decision Record and Finding of No Significant Impact. 2004.	Miles City Field Office, BLM	Fidelity has committed to monitoring activity in their proposal; including: Sage grouse leks within two miles of development. See Monitoring appendix of the 2003 MT EIS.
Fidelity Exploration and Production Company. Tongue River - Coal Creek Project Plan of Development. MT-020-2004-297. Decision Record and Finding of No significant Impact, 2005.	Miles City Field Office, BLM	Fidelity Exploration & Production Company has committed to monitoring activity in their proposal; including: Sage and sharp-tailed grouse activity within two miles of development. See Monitoring appendix of the 2003 MT EIS.
Greencore Pipeline Company. Environmental Assessment. Bureau of Land Management. EA No. WY-060-EA11-32. January 2011.	Buffalo Field Office, BLM Casper Field Office, BLM Lander Field Office, BLM Miles City Field Office, BLM	Greencore has committed to conducting two additional aerial surveys during the winter of 2010/2011 to determine greater sage-grouse winter concentration areas. Appropriate protection measures (i.e., buffers and timing constraints from November 15 – March 14) would be implemented on a site specific basis.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Wildlife habitat evaluations using Habitat Evaluation Procedures (HEP) and Habitat Suitability Indices (HSI) for appropriate species will be developed within 1 year of the ROD and will be used to evaluate impacts to habitat and the effectiveness of reclamation and mitigation.

Citation	Field Office	Description
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators will inventory greater sage-grouse seasonal habitats within the JIDPA not already inventoried by BLM or WGFD within 1 year after signing of the ROD for this project; GIS data would be provided to the Authorized Officer with FGDC-compliant metadata. Operators would initiate coordination with the Authorized Officer and JIO prior to implementing this action.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators will monitor nesting of raptors, including ferruginous hawk, bald eagle, and burrowing owl; greater sage-grouse lek attendance; and occurrence of other sagebrush-obligate species within the JIDPA in coordination with Authorized Officer and the JIO.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators would cooperate in ongoing greater sage-grouse studies in the area.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Operators would cooperate with the WGFD on existing/new greater sage-grouse habitat improvement efforts within Upland Game Bird Management Area 7 (e.g., water developments).
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	Substantial off-site compensatory mitigation directed at sage-grouse habitat improvements will be employed to further mitigate impacts.
Jonah Infill Drilling Project Environmental Impact Statement and Record of Decision, Sublette County, Wyoming. 2006.	Pinedale Field Office, BLM Rock Springs Field Office, BLM	The Operators will establish a fund for compensatory mitigation as part of their operation. This fund will be administered by the Jonah Interagency Monitoring and Mitigation Office (JIO) established by this ROD (see Appendix C). The JIO will evaluate monitoring and mitigation effectiveness and provide annual adaptive management recommendations as appropriate to the BLM for consideration. WGFD and the Governor of Wyoming have coordinated on these strategies.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	KMG will enter into discussions with the BLM to mutually investigate possibilities for voluntary offsite mitigation measures for wildlife habitat enhancement after evaluation of the effectiveness of onsite mitigation, including BMPs.
Kerr-McGee Oil & Gas Onshore LP (KMG), Greater Natural Buttes EIS UT-080-07-807, BLM Vernal Field Office, Record of Decision, May 2012.	Vernal Field Office, BLM	KMG will participate in industry groups and projects to support efforts to reduce impacts to wildlife that may result from oil and gas activities in the GNBPA.
Lance Oil & Gas Co. Kinney Divide Unit Epsilon Plan of Development Environmental Assessment, WY-070-12-148, 2012.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the operator will conduct clearance surveys for sage-grouse breeding activity during the sage-grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 miles of the proposed activities.
Lance Oil & Gas Company Inc. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface-disturbing activities.
Lance Oil & Gas Company Inc. Camp John Unit Epsilon POD WY-070-EA10-239, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the operator will conduct clearance surveys for sage-grouse breeding activity during the sage-grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities
Lance Oil & Gas Company Inc. Highland Unit Delta Environmental Assessment WY-070-10-383, 2010.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist no later than July 31 of the current year. This condition will be implemented on an annual basis for the duration of surface disturbing activities.
Lance Oil & Gas Company, Inc. Bear Draw Gamma. WY-070-11-172. Bureau of Land Management, Buffalo Field Office. 2011.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Lance Oil & Gas Company, Inc. Quarter Circle 9 Beta Environmental Assessment, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Lance Oil & Gas Company, KDU Gamma Plan of Development Environmental Assessment WY-070-EA10-271, 2010.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Lance Oil & Gas Company. Powder Valley Unit Epsilon Environmental Assessment WY-070-EA10-232, 2010.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.

Citation	Field Office	Description
Lance Oil & Gas Inc., Coulter 4 POD EA, WY-070-08-169, Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Lance Oil & Gas, Powder Valley Unit Delta Environmental Assessment WY-070-EA08-143, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 1; WY-070-EA11-214 Buffalo Field Office, 2011.	Buffalo Field Office, BLM	A greater sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a BFO biologist and approved prior to surface-disturbing activities.
Lance Oil and Gas Company, Inc. Camp John Unit SMA Phase 1, Year 2; WY-070-EA12-084, Buffalo Field Office, 2013.	Buffalo Field Office, BLM	For and surface disturbing activities proposed in sagebrush lands, the operator will conduct clearance surveys for Greater Sage-Grouse breeding activity during the sage grouse's breeding season (April 1-May 7) before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 miles of the proposed activities. All survey results shall be submitted in writing to a BFO BLM biologist no later than July 31 of the current year. This condition applies to the entire project area and will be implemented on an annual basis for the duration of the surface disturbing activities.
Lance Oil and Gas Company, Inc., Sahara Plan of Development (POD) Environmental Assessment WY-070-EA13-72, 2013.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the operator will conduct clearance surveys for Greater Sage-Grouse breeding activity during the Greater Sage-Grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 miles of the proposed surface disturbance activities.
Lance Oil and Gas Company. Coal Gulch Unit Gamma POD Categorical Exclusion WY-070-390CX3-11-64 through WY070-390CX3-11-128 Bureau of Land Management Buffalo Field Office, 2010.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted for all known leks within 2 miles of the POD by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist no later than July 31 of the current year.
Noble. Environmental Assessment Huntington Valley 3D Seismic Project. DOI-BLM-NV-E020-2013-0008-EA. August 2013.	Tuscarora Field Office, BLM	Sage-grouse lek surveys were conducted for the project area plus a 3-mile buffer around the project area. Two surveys for new or undocumented leks (aerial fixed-wing flights) were conducted as well as three ground surveys of each lek to confirm activity status and record lek attendance numbers. Lek attendance numbers were used for monitoring trends and impacts, in accordance with standard BLM and Nevada Department of Wildlife survey protocols.
Noble. Marys River 3D Seismic Project. DOI-BLM-NV-E030-2012-0518-EA. Elko District – Wells Field Office. August 2012.	Wells Field Office, BLM	Sage-grouse lek surveys were conducted for the project area plus a 3-mile buffer around the project area. Two surveys for new or undocumented leks (aerial fixed-wing flights) were conducted as well as three ground surveys of each lek to confirm activity status and record lek attendance numbers. Lek attendance numbers were used for monitoring trends and impacts, in accordance with standard BLM and Nevada Department of Wildlife (NDOW) survey protocols.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Clearance surveys for sage grouse breeding activity would be documented in a database. Document changes, if any, in breeding distribution, associated with oil and gas development.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Mitigation monitoring and reporting to determine effectiveness of mitigation measures contained in the ROD. Modify mitigation measure as appropriate to achieve stated goals.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Mitigation Monitoring and reporting to determine if operating within decibel level thresholds is sufficient to protect grouse breeding integrity.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	Required a wildlife monitoring plan to be developed by technical agency group.

Citation	Field Office	Description
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The BLM Buffalo Field Manager will implement the Mitigation Monitoring and Reporting Plan by establishing the Powder River Basin Working Group (PRBWG). The PRBWG will function as a resource working group consisting of BLM, cooperating agencies and other agencies who have expertise and regulatory authority in the area. The primary function of the PRBWG will be to: Review the development and implementation of monitoring plans for the PRB oil and gas development; Meet at a minimum once a year or more often as needed; Keep written record of meetings and disseminate to members and interested public; Conduct field inspections as needed to review the implementation of construction and rehabilitation operations; Review status quo and any new information since last meeting (e.g., monitoring results of impact mitigation effectiveness); Synthesize monitoring plan activities/expectations for the coming year, based upon operator input and new information; Review recommendations from the Task Groups and submit a recommendation to BLM (e.g., management practices and monitoring needs for upcoming field season); Oversee implementation of monitoring.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will conduct clearance surveys for threatened, endangered or other special-concern species at the optimum time. Inventory for special concern species is contingent upon landowner concurrence. This will require coordination with the BLM before November 1 annually to review the potential for disturbance and to agree on inventory parameters.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The Companies will conduct clearance surveys for threatened, endangered or other special-concern species at the optimum time. Inventory for special concern species, other than federally listed species below, is contingent upon landowner concurrence. This will require coordination with the BLM before November 1 annually to review the potential for disturbance and to agree on inventory parameters.
Powder River Basin Oil and Gas Project, Record of Decision and Resource Management Plan Amendments. EIS WY-070-02-065. April 2003.	Buffalo Field Office, BLM	The semi-annual report will include field survey reports for endangered, threatened, proposed and candidate species for all actions covered under the Environmental Impact Statement (EIS) for the Powder River Basin Oil and Gas Project and ROD. The semi-annual reports will include all actions completed up to 30 days prior to the reporting dates. The first report will be due 6 months after the signing of the ROD and on the anniversary date of the signing of the ROD. Reporting will continue for the life of the project.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	This ROD includes a Wildlife Monitoring and Mitigation Matrix (Appendix B) that will trigger mitigation responses based upon monitoring information (e.g. Average of 30% decline in sage grouse male lek attendance over 2 years compared to reference area would trigger mitigation)
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Adaptive management - The Operators will provide information on existing development and results of relevant monitoring studies at the annual meeting of the Review Team...When monitoring indicates a change requiring mitigation, serious mitigation efforts will be developed...
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Decibel monitoring from March 1-May 15 at lek sites.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Establish a Pinedale Anticline Project Office to obtain, collect, store, and distribute monitoring information to support adaptive management and analyze mitigation projects.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	If existing information is not current, field evaluations for greater sage-grouse leks and/or nests will be conducted by a qualified biologist prior to the start of activities in potential greater sage grouse habitat. These field evaluations for leks and/or nests will be conducted if project activities are planned in potential greater sage-grouse habitat between March 15 and July 15. BLM wildlife biologists will ensure that such surveys are conducted using proper survey methods.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Monitor winter concentration area use.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Nesting success and habitat selection study.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Operators pay into a Fund used for additional air quality monitoring, additional wildlife, livestock, vegetation and reclamation research, analysis, monitoring, and mitigation.



Citation	Field Office	Description
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Should a change requiring mitigation occur for any of the performance standards, mitigation responses will first evaluate on-site measures then off-site measures and operational measures as outlined in the following sequence: On-site: Protection of flank areas from disturbance (e.g., voluntary lease suspensions, lease buyouts, voluntary limits on area of delineation/development drilling) to assure continued habitat function of flank areas, and to provide areas for enhancement of habitat function. AND/OR Habitat enhancements of SEIS area (both core/crest and flanks) at an appropriate (initially 3:1) enhancement-to-disturbance acreage ratio. On-site/Off-site: Conservation Easements or property rights acquisitions to assure their continued habitat function, or provide an area for enhanced habitat function (e.g., maintenance of corridor and bottleneck passages, protection from development, establishment of forage reserves, habitat enhancements at an appropriate (initially 3:1) enhancement-to-disturbance acreage ratio). Modification of Operations: Recommend, for consideration by Operators and BLM, adjustments of spatial arrangement and/or pace of ongoing development.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Table B.1 Standard 2: If there is an average of 30% decline in attendance numbers over 2 years as measured by the total average 2-year change in numbers of males attending development area lek complexes (the Mesa, Duke's Triangle, or Yellow Point lek complex), compared to the East Fork, Speedway, or Ryegrass reference lek complexes, additional mitigation responses are applied.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Table B.1 Standard 4: If there is an average of 15% per year decline in amount of winter habitat used over 2 years compared to reference areas, and a concurrent average of 30% decline in numbers over 2 years compared to reference area, additional mitigation responses are applied.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	Table B.1 Wildlife Monitoring and Mitigation Matrix provides standards based metrics that, if not met, trigger additional mitigation responses to ensure standards are met. Standard 1: Active use on 70% of total current leks; Active use on 70% of leks in each complex (the development area complexes include the Mesa, Duke's Triangle, and Yellow Point complexes) compared to 2007 data. If a 30% decline in total number of active leks, or 30% decline in the number of leks in a single complex is observed, additional mitigation responses are applied.
Record of Decision, Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County, Wyoming. 2008.	Pinedale Field Office, BLM	The total contribution to the Fund by Ultra, Shell, and Questar will be \$36 million. Ultra, Shell, and Questar will each annually contribute \$7,500 for each well spudded on their respective leaseholds the previous calendar year. Ultra, Shell and Questar may make advanced contributions to the Fund to implement projects. Such contributions will be credited toward the end of development contributions. Annual contributions are anticipated to be \$1.8 million per year with an initial contribution of at least \$4.2 million. The Fund will be used for both on-site and off-site mitigation and project-related activities in the PAPA vicinity including additional air quality monitoring, additional wildlife, livestock, vegetation and reclamation research, analysis, monitoring, and mitigation. The Fund could be used to support wildlife mitigation such as basic habitat enhancements for improvement of habitat function both on-site and off-site and to identify and protect key migration routes and wildlife habitat. The Fund may also be used for monitoring impacts resulting from development and the effectiveness of the mitigation. Mitigation and monitoring may occur on federal, state, or private lands. It may also be used to provide funds to governmental agencies to pay personnel to complete, oversee, mitigate, and monitor PAPA activities. The Fund is not intended to fund projects or proposals to mitigate potential impacts beyond those identified in the Final SEIS (BLM, 2008).
Summit Gas Resources, Inc. Cabin Creek VII Federal POD WY-070-EA12-183, Buffalo Field Office, 2012.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the operator will conduct clearance surveys for sage-grouse breeding activity during the sage-grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 miles of the proposed activities. This will apply to all approved wells and infrastructure. All survey results shall be submitted in writing to a Buffalo BLM biologist no later than July 31 of the current year. This condition will be implemented on an annual basis for the duration of surface disturbing activities. If a previously unknown lek is identified during surveys (April 1-May 7), a Buffalo BLM biologist shall be notified.
Williams Production RMT Company, Cedar Draw Unit 2 POD, EA WY-070-07-137, Buffalo Field Office Buffalo, Wyoming, 2010.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Williams Production RMT Company, Cedar Draw Unit 3, WY-070-EA11-236, Bureau of Land Management, Buffalo Field Office, 2011.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
WPX Energy Rocky Mountain, LLC, Plans of Development North Butte 4, North Butte 3, J Christensen Federal 21-35 and Tex Draw Add 1, Environmental Assessment (EA), WY-070-EA12-123, 2013.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist no later than July 31 of the current year. This condition will be implemented on an annual basis for the duration of surface disturbing activities.

Citation	Field Office	Description
Yates Petroleum Company. NEO Coal Bed Natural Gas Environmental Assessment WY-070-10-331, 2010.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile
Yates Petroleum Corporation, Congaree POD EA, WY-070-10-195, Buffalo Field Office, 2010.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	A sage-grouse survey will be conducted for all known leks within 2 miles of the POD by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist no later than July 31 of the current year. Currently, this applies to the Gilkie Ranch lek, Innes lek, and North Beaver Creek leks.
Yates Petroleum Corporation, Gauge POD EA, WY-070-EA09-75, Buffalo Field Office, 2009.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	A sage-grouse lek survey will be conducted for all known leks within 2 miles of the POD by a biologist following the most current WGFD protocol. All survey results shall be submitted in writing to a Buffalo BLM biologist and approved prior to surface disturbing activities.
Yates Petroleum Corporation. All Day POD. EA # WY-070-08-026 and COAs. Buffalo Field Office Buffalo, Wyoming, 2008.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Yates Petroleum Corporation. Lazurite POD Environmental Assessment WY-070-EA09-095, 2009.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.
Yates Petroleum Corporation. Napier Road POD Environmental Assessment WY-070-EA10-280, 2010.	Buffalo Field Office, BLM	For any surface-disturbing activities proposed in sagebrush shrublands, the Companies will conduct clearance surveys for sage grouse breeding activity during the sage grouse's breeding season before initiating the activities. The surveys must encompass all sagebrush shrublands within 0.5 mile of the proposed activities.

**APPENDIX O**  
**Implemented Projects**

**Table O-1. Description of Implemented Sage-grouse Mitigation Projects.**

<b>Project Name</b>	<b>Project Description</b>
BLM. Piceance Basin Greater Sage-Grouse Habitat Inventory, 2006	<p>ExxonMobil, and EnCana allowed BLM to use their land to access public land and/or to conduct the habitat inventory on their land. EnCana provided \$17,000 to help fund this project. Developed a computer model of potential sage-grouse habitat within the Parachute Creek – Piceance Basin – Roan Plateau area (PPR). The next step was to ground-truth the vegetation types within the computer model.</p> <p>We are using this information to improve our estimate of the acreage of sage-grouse habitat. We have also used this information to identify several potential areas for habitat restoration work based on dense shrub cover, low understory cover, tall serviceberry shrubs, or the encroachment of pinyon/juniper. EnCana has provided \$10,000 towards sage-grouse habitat restoration and we plan to begin work next summer.</p>
BLM. PPR Greater Sage-Grouse Habitat Mapping, 2008	<p>Vegetation mapping of 29,205 acres 2007 field season. We are using this information to improve our estimate of the acreage of sage-grouse habitat. We have also used this information to identify several potential areas for habitat restoration work based on dense shrub cover, low understory cover, tall serviceberry shrubs, or the encroachment of pinyon/juniper. ConocoPhillips, EnCana, ExxonMobil, Orion Energy Partners, Shell, and landowners provided access to their land. EnCana provided \$34,000 to help fund this project in 2006 and 2007.</p>
Mesa Sagebrush Fertilization Project Prepared by Bureau of Land Management Pinedale Field Office. WY-100-EA11-186.	<p>Decision approves fertilization of 30,958 acres of BLM administered lands to improve sagebrush habitat conditions. In 2010, the mule deer monitoring data indicated the mule deer numbers on the Mesa decreased more than 15% triggering a mitigation response as outlined in the ROD. This project was developed as a mitigation response to exceeding the threshold in change of mule deer abundance as outlined in the WMMM. Habitat enhancement is one of the first options available in the Mitigation Responses to population decline. The project is designed to enhance available winter forage for mule deer by increasing sagebrush production, and potentially increasing palatability and nutrient quality on identified mule deer crucial winter range. The proposed project has been reviewed and is in conformance with BLM IM. No. WY-2010-012 and is consistent with guidelines provided in the Governor’s Sage-grouse Implementation Team’s Core Population Area strategy and the Governor’s Executive Order 2011-5. The project would maintain and/or potentially increase the current sagebrush canopy cover and should therefore maintain the functionality and quality of the habitat for sage-grouse in winter. The shift in plant community dynamics that would be expected to occur with the fertilizer treatments could increase the amount of cover and forage available for sage-grouse on the Mesa year round. To date approximately 1,600 acres have been fertilized (2 separate projects) and efforts are underway to determine whether actions have resulted in increased vegetation productivity and/or nutrient content.</p>

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<b>Project Name</b>	<b>Project Description</b>
Arambel Reservoir Habitat Improvement	Treatment of 5-acre test plots using Lawson Aerator. Snow fence construction to add moisture for increased reclamation success, test of weed control methods, and repair of dam on Arambel Reservoir. Develop 2 water wells and build an enclosure around Sublette Springs to improve the riparian area. Project funded \$499,000. 1830 acres. Status (2011): in progress, monitoring on-going.
Cottonwood Ranches Bench Corral Conservation Project	This project has three parts including: 1) Conservation easement and conservation plan to preserve and enhance pristine wildlife habitat on 1,110 acres; 2) Water efficiency project that will allow improved irrigation and grazing management on 25,000 acres, and 3) Funding for intensive grazing management on a large scale (25,000 acres) that will address BMPs for sagebrush obligates. Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$559,900.00. 27,000 acres. Status (2011): Conservation easement complete.
Cottonwood Ranches II Conservation Easement	This is the second Cottonwood Ranches project. This project includes a conservation easement with a conservation plan on approximately 1,600 acres of private land; implementation of improved grazing management on adjacent BLM allotments, state leases and private lands; and implementation of a water efficiency project designed to enhance grazing management implementation, increase forage production (for wildlife and livestock), and improve stream and riparian health over a two-mile stretch of Cottonwood Creek. Project meets JIO wildlife mitigation goals for preserving and enhancing valuable wildlife habitats. Acres: 5,172; Status (2011): Conservation easement complete; Project funded \$910,417.00.
Cottonwood Ranches III Easement	Conservation easement acquisition coupled with long-term land management planning and habitat improvement projects. Project funded \$988,350.00. 2,571 acres. Status (2011): Conservation easement complete.
Cottonwood Ranches Conservation Plan	Plan for Cottonwood I, II, and III projects. The general location of the Cottonwood site was selected by the Jonah Interagency Office staff in 2007 for its outstanding wildlife values that mimic those found in the Jonah Field. The overall goal of the Cottonwood Ranches Initiative is to conserve and enhance the contiguous 90,000 acres of deeded and public lands controlled by the Cottonwood Ranches. Three progressive management plans are incorporated into a comprehensive plan that adds an additional contiguous 5,034 acres to the management planning area, and connects the Cottonwood Ranches site to the McNeel Trust JIO project site, providing a contiguous block of 50,000 acres being managed for benefits to sage-grouse and other affected species. This project includes the implementation of various practices to improve wildlife habitat including sagebrush treatments, watering facilities, irrigation practices, and monitoring. Project funded \$625,000.00. Status (2011): In progress

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<b>Project Name</b>	<b>Project Description</b>
Carney Ranch Conservation Easement	Conservation easement, with a conservation plan on 2,571 acres of extremely valuable wildlife habitat in the Upper Green River Valley that is at high risk for development. This property includes portions of the pronghorn antelope migratory bottleneck (the Funnel Bottleneck) at the head of the Upper Green River, sage-grouse nesting and brood rearing habitat, approximately one mile of Green River frontage, elk winter range, moose crucial winter range, and other wildlife habitat values. This project meets the JIO wildlife mitigation goals by permanently protecting the "Funnel Bottleneck" portion of the pronghorn antelope migratory corridor. The conservation plan demonstrates how this property will be managed in a way that improves/maintains/protects these valuable habitats. Project funded \$2,093,800.00. Acres: 51,156; Status (2011): In progress.
Cross Lazy Two Ranch Project	Project involves (1) purchasing a conservation easement on the ±4,410-acre Cross Lazy Two Ranch and (2) implementing a mutually-agreeable conservation/habitat management plan includes annual monitoring and a communication plan to ensure regular review and adaptation as necessary. Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$2,000,000.00; Acres: 4,598; Status (2011): Conservation easement complete; conservation plan implementation in progress
Diamond H Ranch Conservation Project	Conservation easement and conservation plan on approximately 3,000 acres of high quality wildlife habitat around small-tract home-site developments. Habitat fragmentation resulting from development activities are considered to be among the State's greatest threats to wildlife habitat and to traditional agricultural operations. Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$479,430.00. Status (2011): Complete.
Elk Mountain/Red Canyon Prescribed Burn	Project includes the improvement of upland plant communities for various wildlife species, including sage-grouse, with prescribed burning of 20,000 acres in a mosaic pattern in the Elk Mountain area. This action is the most environmentally acceptable method of stimulating regeneration of desired plant communities (aspen, mountain shrubs and grasses). Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$72,000.00. Status (2011): complete
Espenscheid Ranches Conservation Easement	Project is designed to meet JIO wildlife and livestock mitigation goals through acquisition of a conservation easement on 10,000 acres of private land and a grazing management plan for 10,700 acres of associated BLM allotments. Conservation easement and plan must be completed by May 31, 2011. Project funded for \$575,000. 10,000 acres. Status (2011): funded
McNeel Conservation Plan	Project involves: 1) purchasing a conservation easement on the 620 acres of McNeel Ranch and 2) implementing and monitoring a conservation/habitat management plan on 2,500 acres. Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$320,000.00. 2,052 acres. Status (2011): Conservation easement complete; conservation plan implementation in progress.

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<b>Project Name</b>	<b>Project Description</b>
MJ Ranch Conservation Project	Conservation easement and conservation plan on 2,052 acres to preserve valuable wildlife habitat. Project meets JIO wildlife mitigation goals for preserving and enhancing wildlife habitats. Project funded \$536,821.00. Status (2011): Conservation easement complete; conservation plan implementation in progress.
Noble Cora Peak Wildlife Project	Project includes 3 separate components: 1) Upgrade an existing spring and install a diversion to divert sediments away from the spring. Spring will provide essential vegetation for sage-grouse brood rearing, and drinking water for wildlife. 2) Drill and install a new water well with facilities for wildlife and livestock. This well will allow water to run-off down into the draw and into an old reservoir potentially creating vegetation essential for sage-grouse brood rearing. This watering facility will also create clean drinking water for pronghorn, as this is in the migratory area. Potential exists to install a wildlife friendly fence around the spring and reservoir for wildlife use. 3) Drill and install 2nd water well in northeast area of allotment. This well will provide drinking water for pronghorn and mule deer, especially during migrations, as well as livestock. Potential exists to develop plans for vegetation improvements if warranted. Project proponent will use the watering systems to implement a rotational grazing pattern throughout the allotment. Project funded \$64,640.00. Status (2011): in progress
Ryegrass Allotment Mowing Project	Project consists of mowing sagebrush on the Ryegrass Individual and James Ryegrass allotments. Project meets JIO wildlife mitigation goals by enhancing wildlife habitats through creating a mosaic landscape improving diversity and age classes of vegetation. Project funded \$13,000.00. Project status (2011): Completed
Water Trough Bird Ramps	Install wildlife escape ramps in all BLM range improvement water tanks. Project meets JIO wildlife mitigation goals by reducing sage-grouse and other animal drowning in livestock watering facilities. These escape ramps will allow for easy access out of the tank should animals fall in. Eighty ramps installed in 2009. Project funded \$36,500.00. Status (2011): in progress.

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Project Name	Project Description
Fence monitoring for sage grouse strikes, 2012 Monitoring Report, Aster Canyon Consulting.	11.9 miles of fence were monitored 8 times during greater sage-grouse lekking season (March, April, and May). 4 simple strikes and 4 mortality strikes of greater sage-grouse were recorded during lekking season monitoring. 78.2 miles of fence were monitored twice outside of greater sage-grouse lekking season (July and August). 3 simple strikes (2 greater sage-grouse, 1 common nighthawk) and 6 mortality strikes (3 greater sage-grouse, 3 horned lark) were recorded during summer monitoring. In the spring of 2011, fence markers were placed along the northern border of the JIDPA in places where sage-grouse strikes had been recorded in 2010. The same was done in the spring of 2012 for all sage-grouse strikes recorded in 2011. The objectives of 2012 fence monitoring were to: (1) provide locations of fence strikes on 11.9 miles of fence monitored during sage-grouse lekking season and 78.2 miles of fence monitored during the summer; and (2) provide information on the effectiveness of previously-placed fence markers. In 2013, monitoring surveys to document fence strikes will be conducted on 9.3 miles of designated fence line in the northern portion of the JIDPA. If sage-grouse fence strike areas are identified, those problem areas of fence will be subsequently equipped with strike deterrents in accordance with the methods developed by Sutton Avian Research Center in Oklahoma.
Greater sage-grouse lek surveys, 2012 Monitoring Report, Aster Canyon Consulting	In 2012, the BLM and WGFD conducted annual sage-grouse lek surveys and inventories in the JIDPA and 3-mile buffer. In 2013, Annual lek counts and inventories will be conducted by WGFD and BLM personnel on existing known lek locations within the JIDPA and a 3-mile buffer.
Atlantic Rim Sage Grouse Winter Concentration Habitat Mapping Study	1. Generate winter probability-of-occurrence maps across the Atlantic Rim based on data collected in winter 2007–2010. 2. Identify source winter habitats through seasonal risk-assessment modeling (i.e., determine which habitats identified as having a high probability-of-occurrence also have high probabilities of adult female survival during winter. 3. Generate maps depicting areas of winter conservation concern across the Atlantic Rim based on winter occurrence of grouse and risk of adult female survival
Avian Predator Densities associated with Sage Grouse Nests in SW Wyoming. Jonathon Dinkins, et al.	Study of predation risk, compared avian predator densities at sage-grouse nest and brood locations to random locations.
Identifying habitats for Greater Sage-grouse Population Persistence in a Developing Coalbed Methane Field in South-Central Wyoming	1. Generate probability-of-occurrence maps specific to the reproductive period of female sage-grouse; 2. Quantify habitat value as related to reproduction and survival through risk-assessment modeling; 3. Combine these models to identify critical and/or limiting reproductive habitats across the project area (i.e., sink and source habitats)



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Project Name	Project Description
Sage-grouse Inventory and Monitoring in the Atlantic Rim 2007-2009 (BLM / WyG&F / APC)	2007 -Collaring Study –track and monitor sage grouse locations –aerial 2008 -Collaring Study –identify important nesting and brood rearing habitat –air and ground 2009 -Collaring Study –identify important nesting and brood rearing habitat –air and ground
Peters Point Road Re-route Reclamation Monitoring.	On July 30, 2013 EIS personnel conducted an ocular estimate of vegetation growth on the reclaimed road west of the Peters Point airstrip. This project is part of the Reclamation and Wildlife Enhancement Plan.
Prickly Pear SE 12 Pad and Road Reroute	This project is part of the Reclamation and Wildlife Enhancement Plan. The 2011 report was a preconstruction evaluation of the pad and new road and gives suggested reclamation and monitoring information. The 2011 report does not discuss the reclaimed roads.
Cottonwood Ridge Pinyon-Juniper Treatment Project	To further the required mitigation needs for the WTNG project, the BLM and DWR are proposing to mechanically/hand treat approx. 2,070 acres. The proposed action is to use a hand crew as well as a bull hog to cut and limb/shred and grind pinyon pine and juniper (P/J) within the areas shown in the attached map. The project would be mostly on BLM-administered lands with the rest on State of Utah lands. The project would be funded by the Bill Barrett Corporation. The current proposal would include a small portion that is located within the Jack Canyon WSA and lands with wilderness characteristics. The proposed action would benefit sage grouse by removing P/J that is encroaching into existing sagebrush parks, which has reduced the grouses’ natural habitat of only sagebrush and grass, and in addition provided perching trees for raptors that prey upon sage grouse. It
QEP WRB 16-17-10-17 well COA implementation	All of the EA COAs were implemented. Documentation would include invoices showing when the location was built, invoices for the equipment that was used, weed spray invoices, reclamation invoices, water truck invoices and telemetry invoices.
UDWR Sage grouse study (3 year project)	QEP contribution of \$27,450 (voluntary, not required by NEPA)
South Unit Habitat Improvement Project	The project will improve wildlife habitat by deterring the encroachment of pinyon, juniper, and Douglas-fir trees into shrub communities, which are critical for wildlife. Approximately 7,820 acres will be mechanically treated under this proposal. Treatments will occur from mid-summer to fall over a 7-year period. Existing roads will be used to access the project area. A portion of the project was completed in 2006, with additional treatments scheduled during the next few years. Document shows the 2006 and 2007 work was funded. The National Forest Foundation requested that Berry Petroleum, as a participant in the IPAMS “Conservation in Action” program, consider a tax-deductible contribution of \$15,000 in cash and in-kind support (possible labor and equipment use donation). This was prior to the South Unit EIS.

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<b>Project Name</b>	<b>Project Description</b>
Anthro Mountain Habitat Improvement Project	<p>This project will include prescribed burning of up to approximately 1000 acres on Anthro Mountain. This project is one component of several similar projects and part of the conservation action known as the Roosevelt/Duchesne District Prescribed Burns being implemented over several years. The project is designed to improve wildlife habitat and address concerns of conifer encroachment and stressed aspen stands. Utah Division of Wildlife Resources (UDWR) has identified the treatment area as critical big game winter range and it is also habitat for sage grouse and other sagebrush obligate species. This treatment will enhance habitat for both of these types of wildlife. In addition, the project will promote aspen regeneration and reduce density of conifer and sagebrush stands. If matching funding is available, the project will be conducted and completed in the Fall of 2007.</p> <p>Through the assistance of Utah State University, ten study sites containing 4 transects each were established in 2006 to monitor sage grouse use (pellet count transects) prior to and after the prescribed burns. Five of these study sites will be treated (burned) and five will be untreated as controls. Each of these study sites have baseline data collected in 2006, and will be read four times a year. It is anticipated that this monitoring will continue for at least the next five years.</p> <p>The National Forest Foundation requested that Berry Petroleum, as a participant in the IPAMS “Conservation in Action” program, consider a tax-deductible contribution of \$11,500 to match the funding available from other sources as explained in the estimated cost section, above.</p>
Anadarko Sage Grouse Lek Monitoring in the Atlantic Rim Project Area 2009	<p>Greater Sage-grouse lek monitoring is done to determine if a known lek is active or inactive in any given year. Consistent yearly monitoring allows managers the opportunity to look at trends in activity at specific leks and across the landscape. Grasslands Consulting, Inc. was requested to survey seven leks within the ARPA in 2009</p>

<b>Project Name</b>	<b>Project Description</b>
<p>Pinedale Anticline Project Area Sage Grouse Monitoring: Noise Monitoring Report. Prepared by KC Harvey for Pinedale Area Project Office. August 14, 2009.</p>	<p>The changes in background noise that the ROD specifies will be monitored are: “Noise levels demonstrated to impact peak lek use by male sage grouse and a concurrent change in the total average 2-year numbers of males attending development area lek complexes (the Mesa, Duke’s Triangle, or Yellow Point lek complex), compared to the East Fork, Speedway, or Ryegrass reference lek complexes.” Appendix B of the ROD indicates that the specific change in noise monitoring that will require mitigation is as follows: “Decibel levels at the lek more than 10 dBA above background measured from the edge of the lek (2000 ROD, p.27), and a concurrent average of 30% decline in peak numbers of male birds over 2 years vs. reference area.” The purpose of this noise monitoring project was to determine the noise levels at leks during the male attendance period from late March to mid-May. Meeting the noise monitoring criteria of the ROD required equipment capable of measuring noise levels over an extended period. The RFP for sage grouse monitoring for this project specified using four noise monitors for two 10-day intervals during the strutting period. Summary data analysis indicates that average measured noise levels are all below the 10 dBA above background threshold level of 49 dBA. Noise monitoring in 2010 should attempt to answer some of the unknowns in the noise conditions of the project area. This will determine if adjustment for the threshold noise levels defined in the ROD is warranted as part of adaptive management.</p>
<p>Pinedale Anticline Project Area Sage Grouse Monitoring Progress Report. Prepared by KC Harvey for Pinedale Area Project Office. June 16, 2009.</p>	<p>The purpose of this project is to monitor sage grouse activity in the Pinedale Anticline Project Area (PAPA). This will satisfy sage grouse monitoring requirements as described in Appendix B of the Record of Decision (ROD), Final Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration and Development Project. The project area includes six sage grouse lek complexes and covers approximately 550,000 acres in Sublette County, Wyoming. The project consists of two tasks; determination of sage grouse nesting success and habitat selection, and noise level monitoring. Due to a late start for the project, a third task; winter concentration area use, was not included in the work scope.</p> <p>KC Harvey field crews captured and affixed radio collars to 89 sage grouse hens. KC Harvey field crews began tracking collared hens toward the end of the capture effort to monitor nest success. As of June 13, 2009, 11 of 89 collared hens were still sitting on nests. KC Harvey field personnel will monitor bird locations monthly in order to determine habitat selection beginning July 2009. Noise meters were deployed at 13 active leks in the Mesa, Duke’s Triangle, and Yellowpoint lek complexes. Summary data analysis indicates that background noise levels are all below the 10 db above background threshold level (49 db).</p>

<b>Project Name</b>	<b>Project Description</b>
<p>Sommers-Grindstone Ranch Rapid Assessment of Mitigation Value. Holly E. Copeland and Joe Kiesecker. February 3, 2011.</p>	<p>In 2009, the PAPO provided project funds for three conservation easements on 19,546 acres of the Sommers-Grindstone Ranch in Sublette County. Our objective here is to provide a rapid quantitative assessment of the contribution of the Sommers-Grindstone Ranch to the mitigation goals determined by the 2010 assessment. Overall, one-third (6412 acres) of the Sommers-Grindstone easement lies within a Priority Mitigation Area as defined by TNC analysis. There are 752,435 acres of Priority Mitigation Areas overall within the study area, but only 12% (91,634 acres) are privately owned and available for conservation easements. The Sommers-Grindstone easement contributes significantly to many conservation goals with the PAPO (Table 1). The easement exceeds the minimum 2010 analysis goal for four conservation targets: mule deer migration corridor, bald eagle nesting habitat, wetlands, and montane sagebrush steppe. The easement also contributes significantly towards meeting goals of many other conservation targets (Table 1). Project areas will be monitored for easement compliance at least once each year. Habitat and wildlife conditions will be monitored or studied as time and funding allow.</p>
<p>Ten Year Sublette Mule Deer Mitigation Plan. Pinedale Anticline. October 12, 2012.</p>	<p>The focus areas for this 10-year Plan includes lands associated with the Mesa, Soapholes, and Ryegrass (Refer to Maps, Appendices B and G and Figure 1), and other adjacent areas identified by mule deer collaring information as important for either deer transitional ranges or winter ranges. Generally, winter ranges are located at relatively lower elevations associated with the Mesa, Soapholes, and eastern portions of the Ryegrass. Transitional ranges, including migration corridors and stopover habitat areas, have been identified by Sawyer and Nielson (2011) through the collaring and tracking of mule deer that winter on the Mesa. The importance of the Ryegrass, Soapholes, and Mesa areas to mule deer, sage-grouse (<i>Centrocercus urophasianus</i>) and other sagebrush-related wildlife species cannot be overstated, in particular in the face of development and the loss of some of the traditional areas/ranges of importance. Most of these areas are not only important crucial winter range, but also have great importance from a mule deer transitional/migration standpoint. In addition, the majority of the areas evaluated in 2011 lay within the designated Sage-Grouse Core Habitat Area (State of Wyoming Executive Order 2011).</p>

<b>Project Name</b>	<b>Project Description</b>
2012-13 Greater Sage-grouse Annual Report Pinedale Anticline Project Area. Prepared by The Pinedale Anticline Project Office. September 4, 2013.	The 2008 Final Supplemental Environmental Impact Statement Record of Decision for the Pinedale Anticline Oil and Gas Exploration and Development Project (BLM 2008) includes a Wildlife Monitoring and Mitigation Matrix (WMMM) that identifies key wildlife species to be monitored and specific changes that require mitigation (Appendix A, Table 1). For greater sage-grouse, the WMMM is designed to quantitatively identify changes in greater sage-grouse populations within the Pinedale Anticline Project Area (PAPA). The WMMM defines criteria for monitoring greater sage-grouse and outlines mitigation responses if specified thresholds or triggers are met. Six lek complexes are monitored annually for changes specified in the WMMM (Appendix A, Figure 1). Lek attendance by male greater sage-grouse, number of active leks, winter concentration area use and noise are all monitored. Monitoring results indicate a threshold was met in 2012 and 2013. In 2012 and 2013, the Duke’s Triangle complex saw a 50% decline in active leks, exceeding the threshold of a 30% decline in number of active leks in a single development area complex compared to 2007 baseline data.
Greater Sage-grouse Lek Counts (2000-2007) in and Around Fidelity Exploration & Production Company’s Coalbed Natural Gas Development Areas in Big Horn County, Montana and Sheridan County, Wyoming	<p>Since 2002, Hayden-Wing Associates (HWA) has been contracted to conduct wildlife surveys, including greater sage-grouse lek counts, in and around Fidelity’s proposed drilling areas in Big Horn County and Sheridan County (HWA 2002, 2003a, 2003b, 2004a, 2004b, 2005a, 2005b, 2006a, 2006b, 2007a, 2007b). HWA biologists have conducted annual lek counts from 2003 through 2007. In addition, HWA has compiled relevant count data from other sources for leks in and around Fidelity’s Plan of Development (POD) areas. From 2003 to 2007, aerial and ground surveys for greater sage-grouse leks were conducted by HWA in and within two miles of Fidelity’s PODs during the strutting season (i.e., April through early May) to search for new or undocumented leks and to check the activity status of known leks.</p> <p>In addition, HWA has compiled sage-grouse lek data collected before and during drilling operations (i.e., 2000-2007) from the BLM-Miles City Field Office (FO) and BLM-Buffalo FO, Wyoming Game and Fish Department (WGFD), Decker Coal Company (DCC), Spring Creek Coal Company (SCC), and the University of Montana (UMT). BLM biologists have conducted sage-grouse lek counts in the area on an irregular basis and have gathered data from a number of other sources.</p> <p>Thirty-seven greater sage-grouse leks have been documented in and around Fidelity’s drilling areas in Big Horn County, Montana and Sheridan County, Wyoming (Table 1, Figure 1). Although lek counts were conducted differently between leks and years, the total number of grouse counted at each lek provides a general, albeit unreliable, estimate of lek attendance. Survey effort varied from leks having been checked only four of eight years to leks having been checked all eight years. To date, lek activity status in and around Fidelity’s drilling areas does not seem to have been affected by drilling activities from 1999 through 2007.</p>

Project Name	Project Description
<p>Greater Sage-grouse Nesting Habitat within Fidelity Exploration &amp; Production Company’s Badger Hills, Coal Creek, Corral Creek, Decker Mine East, and Deer Creek North Plans of Development in Big Horn County, Montana - 2006.</p>	<p>Fidelity Exploration and Production Company (Fidelity) is developing coalbed natural gas wells within the Badger Hills, Coal Creek, Corral Creek, Decker Mine East, and Deer Creek North Plans of Development (PODs), located in Big Horn County, Montana (Map 1). In order to proactively identify habitats important for greater sage-grouse (<i>Centrocercus urophasianus</i>) conservation, and to plan development in a manner that minimizes impact to sage-grouse populations in the region, Fidelity requested that Hayden-Wing Associates (HWA) provide an inventory of the potential nesting habitat within these PODs that is located within three miles of occupied sage-grouse leks.</p> <p>Approximately 6,218 acres of potential nesting habitat were identified and delineated within the PODs, comprising 24.8% of the survey area. Based on the average stand characteristics, approximately 5,729 acres of the potential nesting habitat were designated suitable quality and 489 acres were designated marginal quality.</p>
<p>Market-based Approach for Restoring Rangelands and Critical Wildlife Habitat in the Sagebrush Biome. Cooperative Sagebrush Initiative. 2011.</p>	<p>CSI members were interested in such a credit trading system, but required a reproducible and defensible tracking system based on appropriate ecosystem service metrics in order for it to be potentially implemented. This project was initiated to develop and evaluate a metric system for mitigation in sagebrush ecosystems and to further evaluate the potential for development of a mitigation credit trading system based on the metrics. The proposed metric system relied on the use of ecological sites as classified and described by the Natural Resource Conservation Service as a basis for assuring equivalency of sagebrush ecosystems and ecosystem services. The system also used an assessment of wildlife habitats to evaluate equivalency of benefits and impacts at landscape scales. Seven project areas were studied, including the Seven Brothers East Ranch is a 3105 acre property owned by Fidelity Exploration &amp; Production Company (Fidelity) in Sheridan County, Wyoming. For the Fidelity Project there were six wildlife species modeled for the landscape analysis: pronghorn antelope, sagebrush lizard, sage sparrow, sage thrasher, sagebrush vole, and sage grouse.</p>
<p>Management Plan and Conservation Strategies of Sage Grouse in Montana, revised 2-1-2005</p>	<p>Fidelity participated in several meetings in Miles City, Montana during the drafting of the Management Plan and Conservation Strategies of Sage Grouse in Montana, revised 2-1-2005 (“Management Plan”). Fidelity provided input during these meetings, and therefore, became aware of the conservation actions for Mining and Energy Development as discussed on pages 59 - 62 in the Management Plan. Prior to the final adoption of the Management Plan, Fidelity started implementing several of the conservation actions in its Coal Bed Natural Gas (“CBNG”) operations in Big Horn County, Montana and Sheridan County, Wyoming.</p>

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<b>Project Name</b>	<b>Project Description</b>
Fidelity Exploration & Production Company Comprehensive Sage-Grouse Strategy. November 2008.	Due to the multitude of sensitivities associated with exploring, drilling and operating of oil and gas properties in sage-grouse habitat, Fidelity has been very proactive in its application of sage-grouse stipulations, collection of data, and interaction with various agencies and nongovernmental organizations since 2002. This pro activity has been recognized by the Wyoming Game and Fish Department, the Bureau of Land Management as well as internally by MDU Resources Group, Inc. The current sage-grouse research being conducted in Sheridan County, Wyoming was initiated in 2006 and was originally designed to identify tools that we could use to operate in sensitive sage-grouse habitat. This research has also identified a significant opportunity to leverage off-site mitigation on Fidelity's 7 Brothers East Ranch to offset potential impacts in the future development of Fidelity's Deer Creek South Plan of Development.
Greater Sage-Grouse Nesting Habitat within Fidelity Exploration & Production Company's Joint Venture North Pilot Project Area in Sheridan County, Wyoming. 2007.	Fidelity is developing CBNG wells within the Joint Venture North Pilot project area, Sheridan County, Wyoming. In March 2007, HWA evaluated potential sage-grouse nesting habitat at and around proposed well locations and proposed compressor station within the project boundary. Sage grouse nesting habitat was described using the characteristics given in the Wyoming Greater Sage Grouse Conservation Plan (2003) and the Management Plan and Conservation Strategies for Sage Grouse in Montana (2005). The purpose of the evaluation was to minimize impacts to sage-grouse suitable nesting habitat during the planning stage.
Occurrence and Success of Greater Sage Grouse Broods in Relation to Insect-Vegetation Community Gradients in Northeastern Wyoming. HWA 2011.	In 2008, we conducted research aimed at identifying important brood habitat (specifically, insect-vegetation communities) in northeastern Wyoming, USA. Specifically, we used statistical approaches to combine insect and vegetation components and to link these components with brood occurrence and survival. Managing for a particular species of insect or plant is generally impracticable. However, the information we provide on how the larger plant/insect community is related to brood success more effectively lends itself to application because such information is better aligned with the tools that are available to managers (e.g., fire management, rotational grazing, vegetation manipulation, etc.). Funding for this study was provided by Fidelity Exploration & Production Company.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

<b>Project Name</b>	<b>Project Description</b>
Noble Energy's Greater Sage-grouse Mitigation Plan for Mary's River Exploration Project, Elko County, Nevada. 2014.	<p>It is the intention of this document to illustrate compliance with WO IM No. 2012-043 and reduce the level of impacts by the proposed action on sage-grouse to an insignificant level through the implementation of Design Features, BMP's, and Mitigation Measures. This mitigation plan will lead to an MOU with the BLM. The NTT has suggested BMP's to be used for fluid mineral extraction. Many of these BMP's are addressed in Noble's proposed BMP's and would be adhered to. In addition to the BMP's and Design Features these Mitigation Measures have been developed and are agreed to by Noble, NDOW, and the BLM to reduce impacts on sage-grouse and sage-grouse habitat to a level that is below significance as defined in the NEPA Handbook H-1790-1 Section 7.3.</p> <p>In addition, compensation for impacts would be sought for temporary, long term and permanent impacts. The Proponents would agree to a maximum of \$600 per disturbed acre at 3:1 ratio for PPH/ Category 1 &amp; 2 and 2:1 ratio for PGH/Category 3 for mitigation off-sets to be put in an Impact Compensation Fund (escrow or similar account) for later use on offsite sage grouse habitat mitigation projects. Further details like how disturbed acres will be calculated and specifics about escrow accounts will be spelled out in the MOU.</p> <p>Types of projects that would be considered include but are not limited to: Habitat enhancement projects; Invasive species treatments (as offsite mitigation only, onsite treatments would remain the responsibility of the proponent); Sagebrush plantings; Conservation easements; Restoring or preserving habitat connectivity; Sage Grouse Research (maximum of 10% total funds)</p>
Wildlife Monitoring for Exploration Activity in the Noble Marys River Project Area, Elko County, Nevada 2012	The Marys River Project Area includes approximately <b>39,366 acres</b> that includes 52% federal (BLM) and 48% private lands. Four known greater sage-grouse leks and one historic lek are known to occur in or within three miles of the Marys River Exploration Project Area. Aerial surveys were conducted on March 27-28 and April 4-5, 2012 to search for new or undocumented leks. One new or previously undocumented sage-grouse lek was discovered approximately two miles outside of the Project Area. Three ground count surveys were conducted at each lek location within three miles of the Marys River Exploration Project Area to determine grouse occupancy and the maximum number of birds attending the lek.
Greater Sage-grouse Winter Concentration Surveys in the Noble Marys River Project Area, Elko County, Nevada, 2013.	The Project Area includes approximately <b>39,366 acres</b> that includes 52% federal (BLM) and 48% private lands. Four greater sage-grouse leks and one historic lek are known to occur in or within three miles of the Marys River Exploration Project Area. Three aerial surveys were conducted during February 2013 to locate wintering sage-grouse and identify winter concentration areas in and within three miles of the Marys River Exploration Project Area. On two of the three surveys, a group of birds was found near the possible new sage-grouse lek that was found in 2012.



*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

Project Name	Project Description
Greater Sage-grouse Lek Surveys in the Noble Marys River Exploration Project Area, Elko County, Nevada during 2013.	Greater sage-grouse lek count surveys conducted by HWA for the Marys River Exploration Project Area in Elko County, Nevada during spring 2013. See 2012 survey description.
Greater Sage-grouse Noise Monitoring in the Noble Marys River Project Area, Elko County, Nevada, 2013.	Noble Energy, Inc. will be implementing an exploration project within the Marys River Exploration Project Area in Elko County, Nevada. Because three active greater sage-grouse leks are known to occur in or within three miles of the Marys River Exploration Project Area, baseline noise monitoring was conducted at these three leks prior to construction activities. Noise monitoring surveys were conducted for seven consecutive days (24 hours per day) to collect full spectrum of natural and human-caused noise.
Noble, Mary's River Drill Rig Noise Levels/Noise Contours, Elko County, Nevada, October 8, 2013.	j.c. brennan & associates, Inc. conducted an analysis of noise levels associated with the Noble Energy drilling at the Mary's River project site within Elko County. To establish the noise levels associated with the proposed well drilling operations, Noise measurements were conducted for the well drilling rig to be used at the Mary's River site. An additional analysis was conducted to determine the effects of snow on sound propagation.
Greater Sage-Grouse Monitoring for Exploration Activity in the Noble Jiggs Project Area, Elko County, Nevada 2012	The Jiggs Project Area includes approximately <b>33,785 acres</b> that includes approximately 60% federal (BLM Elko District Field Office) and 40% private lands. HWA surveyed known sage-grouse leks and searched for new or undocumented leks in and within three miles of the Jiggs Exploration Project Area. Surveys for new leks consisted of two flights, weather permitting, over suitable habitat. No new or previously undocumented leks were found in or within three miles of the Project Area. Three ground count surveys were conducted at each known, and possible lek locations within three miles of the Jiggs Exploration Project Area to determine grouse occupancy and the maximum number of birds attending the lek.
Wildlife Surveys in the Huntington Valley Exploration Project Area, Noble Energy, Inc., Elko County, Nevada 2013.	The Huntington Valley Project Area is approximately <b>63,548 acres</b> . Approximately 55% (34,882 acres) of the Project Area is within lands managed by the Bureau of Land Management (BLM) – Tuscarora Field Office; Elko District Field Office. HWA surveyed all BLM and private lands with landowner permission within the Project Area. HWA surveyed the known sage-grouse leks and searched for new or undocumented leks in and within three miles of the Huntington Valley Exploration Project Area. Aerial surveys were conducted on March 27-29 and May 1-3, 2013 to search for new or undocumented leks. Three ground count surveys were conducted at each lek location in and within three miles of the Huntington Valley Exploration Project Area to determine grouse occupancy and the maximum number of birds attending the lek.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

<b>Project Name</b>	<b>Project Description</b>
Summary of Noise Measurements Conducted for the Flex Drill in the Lamoille Valley, prepared for Noble Energy, September 2013.	j. c. brennan& associates conducted noise measurements and frequency analysis of a drill rig located in the Lamoille Valley are of Elko County. The intent of the noise measurements is to supplement the nose section of the [Huntington Valley] EA and to provide input data for future noise modeling of drill rig noise impacts.
Noble, Huntington Valley Drill Rig Noise Levels/Noise Contours, Elko County, Nevada, October 22, 2013.	j.c. brennan & associates, Inc. conducted an analysis of noise levels associated with the Noble Energy drilling at the Huntington Valley project site. This analysis supplements the EA noise section, and develops noise contours down to 25 dBA for each of the forty-one well sites. An additional analysis was conducted to determine the effects of snow on sound propagation.
Petro-Canada Resources, Red Draw POD, Wildlife and Plant Surveys 2008. Hayden Wing Associates, 2008.	The Red Draw POD is located in the BLM Buffalo Field Office. Aerial surveys for grouse leks were conducted in and within 2 miles of the project area to search for new or undocumented leks and to check the activity status of known leks.
Petro-Canada Resources, Mooney Draw POD Wildlife and Plant Surveys - Hayden Wing 2009	Petro-Canada Resources, Inc. is developing coalbed methane (CBM) resources within the Mooney Draw Plan of Development (POD) located in Campbell County, Wyoming. Hayden- Wing Associates, LLC (HWA) conducted surveys for wildlife and plant species of management concern to the Bureau of Land Management (BLM) - Buffalo Field Office in and around the Mooney Draw POD in 2003, 2004, 2005, 2006, 2007, and 2008 (HWA 2003, 2004a,b, 2005, 2006, 2007, 2008). HWA conducted aerial and ground surveys for greater sage-grouse leks in and within two miles of the POD..
Petro Canada Resources, Twentymile Creek POD Wildlife Surveys, Hayden Wing, 2008.	HWA conducted surveys in and around the Twentymile Creek POD from 2005-2007. In 2008, surveys included aerial and ground surveys to search for new or preciously undocumented sage grouse leks in and within 3 miles of the POD.
Noble Energy, Inc. Mooney Draw POD Wildlife Surveys - Hayden Wing, 2010.	Petro-Canada Resources, Inc. (now Noble Energy, Inc.) is developing coalbed methane (CBM) resources within the Mooney Draw Plan of Development (POD) located in Campbell County, Wyoming. Hayden-Wing Associates, LLC (HWA) conducted surveys for wildlife and plant species of management concern to the Bureau of Land Management (BLM) - Buffalo Field in and around the Mooney Draw POD, including aerial surveys for greater sage-grouse leks in and within two miles of the POD.
Noble Energy, Inc. Mooney Draw POD Wildlife Surveys - Hayden Wing 2011.	Noble Energy, Inc. is developing coalbed methane (CBM) resources within the Mooney Draw Plan of Development (POD) located in Campbell County, Wyoming. Hayden-Wing Associates, LLC (HWA) conducted surveys for wildlife and plant species of management concern to the Bureau of Land Management (BLM) - Buffalo Field in and around the Mooney Draw POD, including aerial surveys for greater sage-grouse leks in and within two miles of the POD.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

<b>Project Name</b>	<b>Project Description</b>
Noble Energy, Inc. Mitchell Draw Amended Phase III POD Wildlife Surveys - Hayden Wing, 2005-2011.	Noble Energy, Inc. is developing coalbed methane resources within the Mitchell Draw Amended Phase III Plan of Development (POD) located in Johnson County, Wyoming. Hayden-Wing Associates, LLC (HWA) conducted preliminary surveys for wildlife and plant species of management concern to the Bureau of Land Management (BLM) - Buffalo Field Office in and around the original Mitchell Draw Phase III POD during 2004 and full surveys during 2005, 2006, 2007, 2008, 2009, and 2010. Surveys included aerial surveys for new or previously undocumented greater sage-grouse leks in and within two miles of the POD.
Noble Energy, Inc. Gator POD Wildlife Surveys - Hayden Wing 2010.	Noble Energy, Inc. proposes to develop coalbed methane resources within the Gator Plan of Development located in Campbell County, Wyoming. The POD covers approximately 2,687 acres and is located in upland habitats west of Wild Horse Creek. HWA conducted surveys for wildlife and plant species of management concern to BLM - Buffalo Field Office in and around the Gator POD. During 2010, surveys for wildlife species conducted by HWA in and around the Gator POD included aerial and ground surveys of known greater sage-grouse leks and aerial surveys to search for new or previously undocumented greater sage-grouse leks in and within two miles of the southern 1/3 of the POD.
Petro Canada Resources, Montgomery Draw POD. Raptor and Greater Sage-grouse Surveys, Hayden Wing 2008.	HWA conducted sage grouse surveys in and around the Montgomery Draw POD 2003-2007. In 2008, sage-grouse lek ground count surveys were conducted to determine the actual number of male and female sage grouse using the Montgomery Lek. Behavior of the birds and the time birds left the lek were recorded.
Petro Canada Resources SS Draw POD, Wildlife Surveys, Hayden Wing, 2008.	HWA conducted surveys in and around the SS Draw POD from 2004-2007. In 2008, surveys included aerial surveys of known sage grouse leks and aerial surveys to search for new or previously undocumented sage grouse leks in and within 2 miles of the POD.
Temporal and hierarchical spatial components of animal occurrence: conserving seasonal habitat for greater sage-grouse. M.R. Dzialak, C.V. Olson, S.M. Harju, S.L. Webb, and J.B., Winstead, Hayden-Wing Associates LLC. Ecosphere Volume 3(4).	Developing strategies for sustainable management of landscapes requires research that bridges regionally important ecological and socioeconomic issues, and that aims to provide solutions to sustainability problems. We integrated Global Positioning Systems (GPS) telemetry and statistical modeling to quantify hierarchical spatial and temporal components of occurrence among greater sage-grouse ( <i>Centrocercus urophasianus</i> ; n=87), a species of conservation concern, with the larger goal of developing spatially-explicit guidance for conservation of important winter habitat in a Wyoming, USA landscape undergoing development for energy resources. This study was funded by ConocoPhillips Company, EnCana Corporation, and Noble Energy in the Gun Barrel, Iron Horse, and Madden Deep units in central Wyoming.

*Evaluation of the NEPA Process as an Adequate Regulatory Mechanism to Eliminate or Minimize Threats to Greater Sage-Grouse Associated with Oil and Natural Gas Development Activities*

<b>Project Name</b>	<b>Project Description</b>
<p>Identifying and Prioritizing Greater Sage-Grouse Nesting and Brood-Rearing Habitat for Conservation in Human-Modified Landscapes, M.R. Dzialak, C.V. Olson, S.M. Harju, S.L. Webb, J.P. Mudd, J.B. Winstead, L.D. Hayden-Wing. PlosOne Volume 6(10) 2011.</p>	<p>We investigated reproductive success in female greater sage-grouse (<i>Centrocercus urophasianus</i>) relative to seasonal patterns of resource selection, with the larger goal of developing a spatially-explicit framework for managing human activity and sage-grouse conservation at the landscape level. The 5,625 km<sup>2</sup> study area included portions of the Wind River Basin in central Wyoming, USA. This study was funded by ConocoPhillips Company, Encana Corporation and Noble Energy.</p>
<p>Landscape features and weather influence nest survival of a ground-nesting bird of conservation concern, the greater sage-grouse, in human altered environments. S. L. Webb, C. V. Olson, M. R. Dzialak, S.M Harju, J.B. Winstead, D. Lockman. 2012.</p>	<p>We studied daily survival rate [DSR] of greater sage-grouse (<i>Centrocercus urophasianus</i>) from 2008 to 2010 in an area in Wyoming experiencing large-scale alterations to the landscape. We used generalized linear mixed models to model fixed and random effects, and a correlation within nesting attempts, individual birds, and years. The study area included 5,625 km<sup>2</sup> of the Wind River Basin in central Wyoming. Funding was provided by ConocoPhillips, EnCana Oil and Gas, and Noble Energy.</p>

**Ralston, Brent E**

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**From:** Gardetto, Jessica D  
**Sent:** Thursday, February 09, 2012 2:27 PM  
**Cc:** Ralston, Brent E  
**Subject:** BLM NEWS: National Forests Added to Sage-Grouse Conservation Planning



## **BLM NEWS RELEASE**

U.S. Department of the Interior • Bureau of Land Management • Washington, D.C., Office • 1849 C Street N.W. • Washington, D.C.

### ***National Forests Added and Comment Period Formally Extended on Planning for Sage-Grouse Conservation Measures***

#### **For Immediate Release**

Date: February 9, 2012

**Contact:** Erin O'Connor (801) 625-5347

Mitch Snow (202) 912-7368

In cooperation with the U.S. Forest Service, the Bureau of Land Management (BLM) will issue a corrected Notice of Intent to address sage-grouse in 10 additional National Forest System Lands and Resource Management Plans and formally extended the comment period through March 23, 2012. The notice will appear in the February 10, 2012, *Federal Register*.

The BLM and the Forest Service are seeking public comment on issues that should be addressed in Environmental Impact Statements (EIS) and Supplemental Environmental Impact Statements (SEIS) that will evaluate and provide greater sage-grouse conservation measures in land use plans in 10 Western states. This notice extends the time period for public comment on the scoping process for the EIS/SEIS through March 23, 2012.

The EIS/SEIS will be coordinated under two regions: The Rocky Mountain Region, previously designated as the Eastern Region, which includes land use plans in the states of Colorado, Wyoming, North Dakota, South Dakota and portions of Utah and Montana; and the Great Basin Region, previously designated as the Western Region, which includes land use plans in northeastern California, Oregon, Idaho, Nevada, and portions of Utah and Montana.

Within the Rocky Mountain Region, the potentially affected National Forest System Land Management Plans include:

- Colorado's Routt National Forest
- Wyoming's Thunder Basin National Grassland, Medicine Bow National Forest and the Bridger-Tetons National Forest.

Within the Great Basin Region, the affected Land Management Plans include:

- Idaho's Boise National Forest, Salmon National Forest, Challis National Forest, Targhee National Forest, Caribou National Forest and the Curlew National Grassland;
- Montana's Beaverhead-Deerlodge National Forest;
- Nevada's Humboldt and Toiyabe National Forests;
- Utah's Ashley National Forest, Manti-LaSal National Forest, Wasatch Cache National Forest, Uinta National Forest, Dixie National Forest and the Fishlake National Forest.

The BLM and the Forest Service aim to incorporate conservation measures into all affected Land Management Plans by September 2014 in order to make the U.S. Fish and Wildlife Service's (FWS) timeline for making a listing decision on this species. As a result, the accompanying EIS's/SEIS's will be conducted under expedited timeframes.

All comments and submissions to be considered for the environmental analysis process must be received by the BLM by close of business on March 23, 2012.

Comments may be made to the by any of the following methods:

- Rocky Mountain Region
  - web site: <http://www.blm.gov/wo/st/en/prog/more/sagegrouse/eastern.html>
  - email: [sageeast@blm.gov](mailto:sageeast@blm.gov)
  - fax: 307-775-6042
  - mail: Rocky Mountain Region Project Manager, BLM Wyoming State Office, 5353 Yellowstone, Cheyenne, WY 82009
- Great Basin Region
  - web site: <http://www.blm.gov/wo/st/en/prog/more/sagegrouse/western.html>
  - email: [sagewest@blm.gov](mailto:sagewest@blm.gov)
  - fax: 775-861-6747
  - mail: Great Basin Region Project Manager, BLM Nevada State Office, 1340 Financial Blvd., Reno, NV 89502

For further information or to have your name added to the mailing list, contact: Johanna Munson, Rocky Mountain Region Project Manager, (307) 775-6329; mailing address 5353 Yellowstone Road, Cheyenne, WY 82009; email [jmunson@blm.gov](mailto:jmunson@blm.gov); or Lauren Mermejo, Great Basin Region Project Manager; (775) 861-861-6400; mailing address 1340 Financial Boulevard, Reno, NV 89520; email [lmermejo@blm.gov](mailto:lmermejo@blm.gov).

The BLM manages more land - over 245 million acres - than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

--BLM--

**Brent Ralston**

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**From:** Lauren Mermejo  
**Sent:** Tuesday, December 16, 2014 6:01 PM  
**To:** Melvin (Joe) Tague; Randall Sharp; Joan Suther; Jessica Rubado; jmbeck@blm.gov; Brent Ralston; Quincy Bahr; Glen Stein; mdillon@fs.fed.us; Johanna Munson  
**Subject:** FW: From E&ENews PM -- ENDANGERED SPECIES: Height of grass coverage key to successful sage grouse nests -- study

FYI.....

x

AN E&E PUBLISHING SERVICE

***ENDANGERED SPECIES:***  
***Height of grass coverage key to successful sage grouse nests -- study***

*Scott Streater, E&E reporter*  
*Published: Tuesday, December 16, 2014*

*A new study has found that the success of greater sage grouse nesting is strongly related to the height of the grass around the nests, a conclusion that some environmental activists say points to the need to better control grazing activities in grouse habitat.*

*The study led by researchers with the Fish and Wildlife Service and the University of Montana studied sage grouse nests in northeast Wyoming and southeast Montana for five years and found that the taller the grass near the nests, the more successful the nest and resulting increase in population.*

*Published this month in the journal Wildlife Biology, the **study** concluded that the size of grass that provides cover from predators has "high predictive power" for nest success and should be utilized "as a management tool to benefit sage-grouse populations."*

*This is particularly true when it comes to managing livestock and sheep grazing, says the study, which also included researchers from Colorado State University and the University of Wyoming.*

*"Findings emphasize the importance of an indirect effect of grazing on sage-grouse nest success. Results have broad implications because livestock grazing is the most widespread land use in the world, affecting 70 percent of land area in the western U.S.," the study says.*

*"However, adjustments to duration and timing of grazing also may increase residual cover with the added benefit of increasing long-term rangeland health on which birds depend," it says.*

*The study comes as federal and state regulators are working to preserve the grouse and its habitat*

bird for possible federal protection.

The \$1 trillion federal spending omnibus bill approved by Congress contained a controversial rider that says FWS shall not use money to "write or issue" listing rules for four types of sage grouse: proposed rules for the greater sage grouse and the Columbia Basin population of greater sage grouse, and final rules for the bi-state population of greater sage grouse and the Gunnison sage grouse ([Greenwire](#), Dec. 12).

But the Bureau of Land Management and Forest Service, which manage the majority of remaining sage grouse habitat, are revising roughly 100 land-use plans covering 67 million acres in an effort to protect and restore its sage grouse habitat. And Western states have completed or continue to work to complete grouse management plans.

While they do that, the study says, "Viability of ranching as a predominant land use may in part determine the future of sage-grouse conservation in the West."

Environmental activists today said the study should be used to better manage grazing on federal allotments and elsewhere in grouse habitat.

"The more grass cows eat, the fewer sage grouse survive on public lands," said Randi Spivak, director of the Center for Biological Diversity's public lands program. "The livestock industry no longer has any defense that cows on public lands do not hurt sage grouse."

A spokesman for the National Cattlemen's Beef Association, the nation's leading cattle industry group, did not respond to a request for comment in time for publication.

"In some parts of the West, ranchers blame predators for sage grouse declines, but when livestock grazing strips away the cover that sage grouse need to hide, the birds and their nests become easy pickings," said Erik Molvar, a wildlife biologist with WildEarth Guardians. "This new study demonstrates the importance of strict regulation of livestock grazing to protect sage grouse habitat.

"This study is proof that irresponsible livestock grazing practices make it difficult for sage grouse populations to survive," he added.

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**Brent Ralston**

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**From:** Thompson, John  
**Sent:** Thursday, August 01, 2013 3:55 PM  
**To:** Mickelsen, Robert -FS  
**Cc:** Brent Ralston; Sandra Brooks; Theresa Hanley; Katherine Kitchell; Jamie Connell; Cornelia Hudson; Patricia Fosse; Kelly Bockting  
**Subject:** Re: Mt Governors Task Force and Preferred Alt.

Hi Rob,

The following is a quick response to your questions and a little extra information to provide context.

The Dillon RMP RMP identified sagebrush habitats that provide sage grouse breeding, early brood rearing, or winter habitat as one of several priority wildlife habitats. The MT Fish, Wildlife, and Parks worked with BLM and others and later identified core GRSG areas which BLM has identified as priority areas in the action alternatives for the Billings, HiLine, Miles City, and Lewistown RMP revisions/amendments.

The Montana Governors GRSG Conservation Advisory Council is an on-going effort and plans to issue a draft management plan October 8-9 for public comment. Final recommendations are scheduled for January 7-8, 2014. We anticipate the Governor will issue an executive order early next calendar year. We do not anticipate any official modifications to the areas identified as GRSG core areas prior to the report being released, although BLM has identified some minor modifications based on our studies that support our on-going RMP efforts. You can go to the MT FWP website and find much more information.

The Dillon Field Office (DFO) is trying to schedule a briefing for the Montana State Director and management team that will compare current GRSG management with each alternative. The DFO will recommend a Preferred Alternative to the MT State Director, and identify elements that will be notable deviations from current management as well as any element of that alternative that would cause concern. Cornie Hudson and Pat Fosse are trying to coordinate with the Beaverhead/Deerlodge NF. The date for this briefing has not be set due to other scheduling conflicts; but it will likely occur early the week of August 12.

Brent and I have discussed whether it would be appropriate for the ID State Director and the MT State Director to discuss a Preferred Alternative before this goes to WO review on 8/12. This may not be necessary if ID and MT identify the same alternatives as a Preferred. Obviously, if the MT management team is not briefed until the week of August 12, that discussion, if necessary, would be delayed.

While the FS would not identify a Preferred Alternative in the DEIS, We would be very interested in your perspective. Obviously, it would be good to coordinate with the B/D. I think we would be especially interested in seeing how the various alternatives compare with the existing B/D Forest Plan. I have encouraged Kelly Bockting (DFO) to use the BLM Greater Sage-Grouse Planning Proposed Alternatives Summary Table (from the Regional ID Team power point) as a template to compare the current Dillon RMP decisions with each of the other alternatives. A similar comparison between the B/D Forest Plan and the alternatives would be equally useful. Also, we should address whether each of the alternatives is consistent with other federal, state, local plans.

Finally, Brent indicated that ID BLM would prefer to notify WO reviewers verbally of the Preferred Alternative. ID and other states in the Great Basin do not want this leaked prematurely. Cooperating agencies would be notified of the Preferred Alternative later. The NV State Director committed to presenting options to

the other SDs on how and when this could be done. I have not heard or seen anything on this yet. We intend to comply with their decision.

Let me know if you have more questions. Also, any assistance in coordinating with the B/D would be appreciated.

On Thu, Aug 1, 2013 at 9:45 AM, Mickelsen, Robert -FS <[rmickelsen@fs.fed.us](mailto:rmickelsen@fs.fed.us)> wrote:

Hey John,

Has Montana submitted anything to BLM regarding habitat delineation or management in SW Montana?

Also, has the State Director discussed the Preferred Alternative selection for Montana, I need to make sure that the B-D NF folks are involved in that conversation.

Thanks..

Robbert Mickelsen

Ecosystem Branch Chief

Caribou-Targhee NF & Curlew NG

208-557-5764

[rmickelsen@fs.fed.us](mailto:rmickelsen@fs.fed.us)

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John Thompson  
Planning and Environmental Specialist  
Montana State Office  
Bureau of Land Management

(406 )896- 5030

**Center for Biological Diversity • American Bird Conservancy •  
Advocates for the West • Wild Earth Guardians •  
Western Watersheds Project • Wild Utah Project**

August 18, 2014

The Honorable Sally Jewell  
Secretary of the Department of the Interior  
U.S. Department of Interior  
1849 C Street, N.W.  
Washington DC 20240

The Honorable Tom Vilsack  
Secretary of the Department of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretaries Jewell and Vilsack,

On behalf of the undersigned organizations, we are submitting a *Scorecard for Conserving the Greater Sage Grouse* for your use and consideration in issuing revised resource management plans (RMPs) for the greater sage grouse. The *Scorecard* is primarily based on the USDO I and USDA's own expert recommendations made in the National Technical Team report of 2011, "to ensure that BLM management actions are effective and based on the best available science" for conserving and restoring greater sage grouse populations and habitat.

As you know, the National Technical Team was comprised of 23 federal and state agency biologists and land managers—including 16 USDO I and two USDA experts — and drew from the extensive scientific literature on sage grouse to produce "A Report on National Greater Sage-grouse Conservation Measures" (NTT Report). The NTT was charged with, among others, to:

- "Identify science based management considerations for the greater sage grouse (e.g., conservation measures) that are *necessary* to promote sustainable sage grouse populations, and which focus on the threats in each of the management zones" [emphasis added].
- "Provide assurance that relevant science is considered, are reasonably interpreted, and accurately presented; and that uncertainties and risks are acknowledged and documented."
- "Understand current scientific knowledge related to the greater sage grouse."
- "Articulate conservation objectives for the greater sage grouse in measurable terms to guide overall planning."

The conservation measures in the NTT Report were derived from "the best available scientific studies" using "best professional judgment." This was confirmed by more than 100 scientists who described the report in a letter to then-Secretary of the Interior Ken Salazar as a "comprehensive compilation of the scientific knowledge needed for conserving Sage-Grouse" that "offers the best scientifically supportable approach to reduce the need to list Sage-Grouse as a Threatened or Endangered species."

It is essential to the conservation and protection of greater sage grouse that USDO I and USDA

follow the conservation measures in the NTT Report in the final RMPs. In fact, the National Technical Team stated that their recommendations should be used “against which management actions and policies of BLM should be weighed.” We agree, and believe that this *Scorecard* is an effective tool for evaluating the RMPs.

In contrast, the “Greater Sage-grouse Conservation Objectives: Final Report” (COT Report) identifies key threats to sage grouse and general conservation objectives for management, but does not provide measurable standards for assessing the adequacy of conservation prescriptions for the species to ensure that conservation measures are effective or will be implemented consistently to stem and reverse the steep population declines that greater sage grouse is experiencing.

We have used the *Scorecard* to evaluate the recently issued Lander Resource Management Plan — the first BLM RMP revision and record of decision completed under the National Greater Sage Grouse Strategy. As the attached graded *Scorecard* demonstrates, the Lander plan fails to adopt adequate conservation measures – including those recommended in the NTT report – and, thus, the Lander RMP will be ineffective in conserving greater sage grouse throughout Lander.

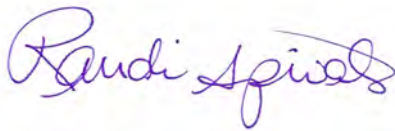
Key flaws in the Lander RMP include:

- ***Allowing new oil and gas leasing within core sage grouse habitat.*** The NTT recommends excluding development in unleased core habitat given the known negative effects of disturbance from fluid mineral development on sage grouse.
- ***Failing to protect sage grouse leks and associated nesting and brood-rearing habitat.*** The Lander RMP fails to protect unleased land, and adopts scientifically untenable lek buffers of 0.6 miles around leks in core habitat. These inadequate buffers stand in stark contrast to empirical scientific information and the NTT Report, both of which recommend much larger buffers to protect sage grouse leks and adjacent habitat – i.e., 4 mile no-surface-occupancy lek buffers for only when there are valid existing rights.
- ***Allowing a disturbance cap in core habitat almost twice as high as recommended by the best available science.*** The NTT says that “where 3% [per an average of 640 acres (one square mile)] disturbance threshold is already exceeded from any source, no further anthropogenic disturbances will be permitted by BLM until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights).” Yet, the Lander RMP adopts a 5% disturbance threshold, without any supporting scientific evidence that this inflated cap will adequately protect sage grouse habitat.
- ***Failing to protect sage-grouse winter habitat.*** The Lander RMP eschews any real protections for sage grouse winter habitat, instead favoring a seasonal restriction on development within winter habitat. But, permitting the degradation and fragmentation of winter habitat during the non-winter seasons will only slow— not eliminate—the adverse effects of any development on winter habitat. As such, seasonal restrictions on development are tantamount to no restrictions. Further, given that several different breeding populations often use the same winter habitat, the result will be disproportionately large.

We will be evaluating each of the forthcoming plans against the *Scorecard* to ensure USDO and USDA are adopting adequate conservation measures based on the best available science on sage-grouse, and we encourage USDO and USDA to do the same. We support these efforts to revise resource management plans to conserve the greater sage grouse, but the plans must be effective to conserve the species, not half measures to avoid difficult decisions and buy a bit more time while the grouse continues to decline.

We would be happy to discuss the *Scorecard* and any other questions you may have.

Sincerely,



Randi, Spivak, Center for Biological Diversity



Steve Holmer, American Bird Conservancy



Bethany Cotton, Wild Earth Guardians



Travis Bruner, Western Watersheds Project

Todd Tucci, Advocates for the West



Allison Jones, Wild Utah Project

Cc:

Tommy Beaudreau, Chief of Staff, Department of the Interior

Dan Ashe, Director, U.S. Fish and Wildlife Service

Noreen Walsh, Regional Director, U.S. Fish and Wildlife Service

Ted Boling, Solicitor's Office, Department of the Interior

Sarah Greenberger, Counselor to the Secretary of the Interior, Department of the Interior

Jim Lyons, Counselor to the Assistant Secretary for Land and Minerals, Department of the Interior  
Michael Bean, Counselor to the Assistant Secretary for Fish, Wildlife and Parks, Department of the Interior  
Robert Bonnie, Under Secretary for Natural Resources and Environment, USDA  
John Podesta, Senior Advisor to the President, White House  
Sally Ericsson, Director, Natural Resource Programs, Office of Management and Budget  
Craig Crutchfield, Interior Branch Chief, Office of Management and Budget  
Mike Boots, Acting Chair, Council on Environmental Quality  
Jay Jensen, Associate Director for Land and Water Ecosystems, Council on Environmental Quality  
Neil Kornze, Director, Bureau of Land Management  
Steve Ellis, Deputy Director Operations, BLM  
Linda Lance, Deputy Director Programs and Policy, BLM  
Ed Roberson, Assistant Director, Resources and Planning, BLM  
Steve Small, National Sage Grouse Coordinator, BLM  
Don Simpson, State Director Wyoming, BLM  
Jamie Connell, State Director Montana/Dakotas, BLM  
James Kenna, State Director California, BLM  
Amy Lueders, State Director Nevada, BLM  
Timothy Murphy, State Director Idaho, BLM  
Juan Palma, State Director Utah, BLM  
Jerome E. Perez, State Director Oregon, BLM  
Ruth Welch, State Director Colorado, BLM  
Tom Tidwell, Chief, US Forest Service  
Mary Wagner, Associate Chief, US Forest Service

**Brent Ralston**

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**From:** Wiedenmann, Kurt  
**Sent:** Wednesday, October 15, 2014 11:37 AM  
**To:** Jon Marvel  
**Subject:** Re: Secretary Jewell's Visit to China Mountain

Jon - currently in the sage-grouse administrative draft proposed plan there is wording that would address this. When our project manager returns from leave next week I will check on the details of that proposed wording.

**Kurt Wiedenmann**

Resources and Science Branch Chief  
BLM - Idaho State Office  
208-373-3813

On Sat, Oct 11, 2014 at 10:35 AM, Jon Marvel <[jhmarvel@westernwatersheds.org](mailto:jhmarvel@westernwatersheds.org)> wrote:  
Steve and Kurt:

I read that Steve and Secretary Jewell will be visiting China Mountain on Tuesday October 14  
( <http://www.jrn.com/kivity/news/Interior-Secretary-coming-to-Idaho-to-tour-sagebrush-conservation-efforts--278828141.html> ).

Coincidentally, just yesterday the Sagebrush Habitat Conservation Fund Board of Directors, of which I am a member, toured China Mountain and the Antelope Springs allotment with Marc Brackett, the co-owner of the Antelope Springs Ranch which is the primary grazing permittee on the Antelope Springs allotment where China Mountain is located. (Guerry Ranches holds a small sheep grazing permit for 81 AUMs on the allotment as well).

We discussed with Marc the possible purchase of the ranch and waiver and retirement of the Antelope Springs allotment, which, as you know, is exceptionally important wildlife habitat for a number of species but especially for Greater Sage-grouse.

I would suggest to you that Secretary Jewell's Office invite Marc Brackett on your tour and take the opportunity to discuss with him privately his thoughts about the conservation values of the allotment and the interest of the Sagebrush Fund in buying the ranch and retiring that grazing permit.

Marc's email address and cell telephone number are: [antelopesprings@msn.com](mailto:antelopesprings@msn.com) ; 208-358-6609.

To work with Marc and accomplish that purchase and retirement, the Sagebrush Fund needs language added to the Jarbidge RMP either through the current review of Protests of that plan or through the SEIS process for RMP plan amendments for Greater Sage-grouse for BLM Field Offices located in Greater Sage-grouse like the Jarbidge Field Office.

Here is recommended language to accomplish that goal:

***Grazing privileges that are lost, retired, relinquished, canceled, or have base property sold without transfer would have attached AUMs held for watershed protection and wildlife habitat.***

Thanks for taking a moment to talk with Marc.

Jon



## RESOURCE MANAGEMENT PLANNING

## POTENTIAL TRIBAL CONSULTATION EFFICIENCIES

## MILES CITY RMP AND SOUTH DAKOTA RMP (POTENTIALLY THE BUFFALO RMP IN WYOMING)

- RMP progress is similar
- All Field Offices routinely consult with the same tribes which have collective interests in both the Powder River Basin Country and the Black Hills
- All three Field Offices have previously held joint intertribal RMP workshops with interested tribes (October 17 and 18, 2012 – Regional Intertribal Workshop on RMP Planning in Spearfish, SD)
- **Could provide joint government to government meetings for those tribes that request them**
- **BLM lands contiguous with the Northern Cheyenne, Ft. Peck - critical that Miles City have govt. to govt. with Ft. Peck and Northern Cheyenne**
- **Miles City April 2014 update** - No formal consultation efforts – the FO has discussed the RMP with THPO's for Crow, N. Cheyenne, and Ft. Peck. FO has also discussed with the cultural committee on N. Cheyenne. Current guidance from the THPOs is not at this time.
- **South Dakota April 2014 update:**
  - May 14, 2013 - BLM, SDFO held a field trip with area tribes to look at and discuss potential cultural sites at Fort Meade ACEC. Representatives from the Standing Rock, Yankton, and Oglala Sioux were present.
  - May 15, 2013 - BLM, SDFO held a field trip with area tribes to discuss oil and gas leasing in Harding County. Representatives from the Standing Rock, Yankton, Oglala Sioux and Crow Tribe of Montana were present.
  - May 30 2013 - BLM, SDFO and MCFO provided a presentation and discussion about the SD RMP and MCFO RMP at the Lower Brule Reservation. Elders from the Standing Rock, Cheyenne River, Crow Creek, and Lower Brule Sioux Tribes were present.
  - June 5-6, 2013 - The SD Field Manager called the Crow Creek, Lower Brule, Oglala, Rosebud, Santee, Standing Rock, Yankton and Sisseton-Wahpeton Oyate, Flandreau, and Fort Peck Sioux Tribes, the Three Affiliated Tribes, Crow Tribe of Montana, and the Northern Cheyenne tribes. The purpose of the call was to inform the tribes of the June 14th release of the Draft SD RMP/EIS and to see if any tribes wanted to meet about the Draft RMP/EIS. None of the tribes expressed interest in a meeting at this time.
  - June 18-19, 2013 - The SD Field Office Cultural Resource Specialist called the Crow Creek, Lower Brule, Oglala, Rosebud, Santee, Standing Rock, Yankton and Sisseton-Wahpeton Oyate, Flandreau Sioux Tribes, the Three Affiliated Tribes, Crow Tribe of Montana, the Fort Peck Sioux and the Northern Cheyenne tribes. She asked the tribes if they would like a meeting or needed additional information about the draft RMP/EIS. The Rosebud Sioux later called back and requested that BLM come to a tribal council meeting and discuss the RMP.
  - August 14, 2013 - BLM, SDFO provided a RMP presentation and discussed the SD RMP at the Rosebud Sioux Tribal Council Meeting.

## BILLINGS RMP

- BiFO unable to participate in intertribal RMP workshop will set up separate meetings
- Emphasis appears to be limited to Crow and Northern Cheyenne
- BLM lands contiguous with Crow Reservation, critical have government to government meeting with Crow
- Due to Nez Perce Trail, critical to have ongoing consultations with Nez Perce Tribe, and other tribes with connections to the trail
- Would be appropriate to also engage the Eastern Shoshone to see if there is an interest
- April 2014 update -

#### HILINE RMP

- Different schedule than Lewistown or Missoula
- BLM lands contiguous with Ft. Belknap, Blackfeet and Ft. Peck Govt. to Govt. critical
- Tribes with traditional interests in Sweet Grass Hills Sacred Landscape include: Ft. Belknap, Rocky Boy, Blackfeet, Salish-Kootenai
- Could participate in Ft. Peck government to government with Miles City and South Dakota
- April 2014 update:
  - April 23, 2013 - Met with the Confederated Salish and Kootenai Tribes of the Flathead Nation Tribal Historic Preservation Officer at the tribal headquarters in Pablo and made a PowerPoint presentation on the HiLine RMP/EIS. The Tribal Council was briefed on the Proposed RMP and the Preferred Alternative (as well as provided a Draft RMP), and the BLM explained the comment period and had a productive discussion with the Tribal Chairman and two councilmen regarding issues where they voiced their support for the proposed plan and its conservation measures pertaining to cultural heritage and preservation. Items discussed included: RMP discussion, OHV usage and closures, grazing leases, and sage-grouse conservation.
  - April 23, 2013 - Met with the Blackfeet Tribal Council and Tribal Historic Preservation Officer at the Tribal Headquarters in Browning, Montana. The Tribal Council was briefed on the Proposed RMP and the Preferred Alternative (as well as provided a Draft RMP), and the BLM explained the comment period and had a productive discussion with the Tribal Chairman and two councilmen regarding issues where they voiced their support for the proposed plan and its conservation measures pertaining to cultural heritage and preservation. The majority of the conversation centered on oil and gas as well as wind energy development. The BLM explained that the RMP only applied to off-reservation public lands managed by the BLM. Items discussed included: RMP discussion, OHV usage and closures, NSO stipulations for oil and gas, interaction of threatened and endangered species, travel management, grazing leases, sage-grouse conservation, and wind energy potential.
  - April 25, 2013 - Met with the Chippewa-Cree Tribal Council and Tribal Historic Preservation Officer (THPO) on the Rocky Boy's Indian Reservation. The Tribal Council and THPO were briefed on the Proposed RMP and the Preferred Alternative (as well as provided a Draft RMP), and the BLM explained the comment period. Items of interest included: carbon sequestration, oil and gas rights-of-way and the Keystone XL pipeline. Items discussed

included: RMP discussion, air resources, NHPA, mineral extraction, federal archaeological reports, carbon sequestration, whitebark pine, Sweet Grass Hills, Keystone XL pipeline, medicinal plants, and tribal government challenges.

- May 3, 2013 - Met with the Fort Peck Tribal Council in Poplar, Montana. The Tribal Council was briefed on the Proposed RMP and the Preferred Alternative (as well as provided a Draft RMP), and the BLM explained the comment period and had a productive discussion with the Tribal Chairman and two councilmen regarding issues where they voiced their support for the proposed plan and its conservation measures pertaining to cultural heritage and preservation. The majority of the briefing was dominated by discussion of oil and gas development. Items discussed included: RMP discussion, tribal sovereignty, oil and gas drilling, fracking, and predator control.
- May 10, 2013 - Met with the Fort Belknap Tribal Council on the Fort Belknap Indian Reservation. The Tribal Council was briefed on the Proposed RMP and the Preferred Alternative (as well as provided a Draft RMP), and the BLM explained the comment period and had a productive discussion with three councilmen regarding issues where they voiced their support for the proposed plan and its conservation measures pertaining to cultural heritage and preservation. They also thanked the BLM for its expertise and mentioned ongoing efforts between the BLM and the Tribal College. Items discussed included: RMP discussion, hard rock mining, mine reclamation, sage-grouse, wind energy, oil and gas, and carbon sequestration.

#### GRSG AMENDMENTS

- **LFO and NDFO April 2014 update** - The FOs sent three sets of letters offering Government to Government consultation. The FOs sent letters for scoping when the process started, a letter was sent offering consultation when the tribes were invited to be cooperating agencies, and letters were sent when the DEISs were released for public comment. To date, neither office has received requests for formal consultation.
- **ID/SW MT April 2014 update** – The BLM has met with both the Sho-Pai (multiple times) and Sho-Ban (once) tribes. Fostering ongoing conversations at the staff level and managers have engaged both tribes during the process. There will be some additional consultation conducted by BLM/FS managers/ authorized officers as we prepare the Administrative Final EIS.

#### LEWISTOWN AND MISSOULA RMP

- Appear to be on similar schedules/time lines
- Consult with some of the same tribes: Blackfeet, Rocky Boy, Salish-Kootenai
- **Would recommend a regional intertribal workshop with Lewistown and Missoula to explain the RMP process would include: MT/WY Tribal Leadership Council: specific invited tribes, Blackfeet, Salish-Kootenai, Chippewa-Cree of Rocky Boy, Shoshone-Bannock, Crow**
- **Can double up on government to government with most tribes.**
- **April 2014 update** – Missoula has not begun their revision yet – doing some inventory work this year – scoping next FY. Lewistown has begun scoping and invited tribes to be cooperating agencies.

**Idaho State Office**  
**September 18, 2014**

**Project Name:** Idaho and Southwestern Montana Greater Sage-Grouse Plan Amendments

**Status:** Review Comments and Coordination

**Requested Action:** Share Comments on Idaho and Southwestern Montana Administrative Draft Proposed Plan & Discuss Coordination

**Project Description:** BLM and Forest Service initiated the National Greater Sage-Grouse Planning Strategy in 2011. The Strategy is responding to the US Fish and Wildlife Service ‘Warranted but Precluded from Listing’ finding in March 2010. As part of the Strategy BLM and Forest Service announced the development of plan amendments to incorporate adequate regulatory mechanisms into existing land use plans to ameliorate threats to the Greater Sage-Grouse identified in the US Fish and Wildlife Service finding.

**Location:** The Strategy addresses all BLM and Forest Service Greater Sage-Grouse habitat in the western United States (North Dakota, South Dakota, Montana, Wyoming, Colorado, Idaho, Utah, Nevada, Oregon and California). The Idaho and Southwestern Montana sub regional environmental impact statement addresses the Greater Sage-Grouse habitat in Idaho, Southwestern Montana and the portion of the Sawtooth National Forest in Utah.

**Resource Issues:** The primary threats to Greater Sage-Grouse in the Idaho and Southwestern Montana sub region include: wildfire, invasive species and human disturbance and development.

**Time Lines:** A Draft Environmental Impact Statement was published and released to the public in November of 2013. BLM and Forest Service are currently working on developing the Proposed Plan and Final Environmental Impact Statement which is expected to be published and released to the public in fall of 2014. An Administrative Draft of the Proposed Plan has been developed and released internally, to Tribal entities and to Cooperating Agencies for review.

BLM has provided an opportunity to review these materials with comments to be provided to BLM the Wings and Roots meeting on September 18, 2014.

Ted

Doug McConahey

Anne-Marie Starker

Tribes see things in plan they can embrace

Wild fire is an issue but fire is a part of the natural process

more human caused fires, and spread of invasive species is also human caused

we are experiencing dry conditions across the west

the strategy of stopping fire has added to fuels on the ground

verbal fact approval of plan

grandmother thought that thunder would kill chicks in the egg

**Brent Ralston**

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**From:** Wiedenmann, Kurt  
**Sent:** Wednesday, September 17, 2014 7:44 AM  
**To:** Brent Ralston  
**Cc:** Jim Fincher; Aimee Betts  
**Subject:** Fwd: BLM BDO W&R NAC 09.18.14  
**Attachments:** 14.BLM.BOI.W&R.09.18.14.rtf

Brent - note that you are on the W&R agenda for Thursday. Reminder I will be on annual leave. Jim/Aimee - please contact Brent an hour or so before when he needs to be there. Thanks.

**Kurt Wiedenmann**

Resources and Science Branch Chief  
BLM - Idaho State Office  
208-373-3813

----- Forwarded message -----

From: **Doug McConnaughey** <[advomediante@gmail.com](mailto:advomediante@gmail.com)>  
Date: Wed, Sep 17, 2014 at 5:39 AM  
Subject: BLM BDO W&R NAC 09.18.14  
To: Doug McConnaughey <[advomediante@gmail.com](mailto:advomediante@gmail.com)>, "Barker, Diane" <[dbarker@blm.gov](mailto:dbarker@blm.gov)>, "Betts, Aimee D K" <[abetts@blm.gov](mailto:abetts@blm.gov)>, "Sullivan, John C" <[jsullivan@blm.gov](mailto:jsullivan@blm.gov)>, "Fincher, James M" <[JFincher@blm.gov](mailto:JFincher@blm.gov)>, "Fredrick (Kirk) Halford" <[fhalford@blm.gov](mailto:fhalford@blm.gov)>, "Ditton, Peter J" <[pditton@blm.gov](mailto:pditton@blm.gov)>, "Wiedenmann, Kurt R" <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, [tfischer@blm.gov](mailto:tfischer@blm.gov), "Roller, Patricia S" <[proller@blm.gov](mailto:proller@blm.gov)>, [tanya.thrift@blm.gov](mailto:tanya.thrift@blm.gov), "McDaniel, Michele" <[mmcdaniel@blm.gov](mailto:mmcdaniel@blm.gov)>, "Chandler, Loretta V" <[lchandler@blm.gov](mailto:lchandler@blm.gov)>

FYI - Attached please find the Thursday, September 18, 2014 Agenda for the BLM Boise District Office Wings and Roots Native American Campfire.

Thank you,  
Doug McConnaughey  
The Wings and Roots Program  
208.899.6200

**Bureau of Land Management – Boise District  
Wings and Roots Program  
Native American Campfire**

**10:00 AM  
Thursday, August 28, 2014  
BLM Boise District Office  
ConferenceRoom  
Boise, Idaho**

**Douglas McConnaughey  
Facilitator, Mediator, Arbitrator  
208.899.6200  
email:  
[AdvoMediate@gmail.com](mailto:AdvoMediate@gmail.com)**

**Department of Interior-BLM Boise District  
Last regular session of the Boise District Wings and Roots: 08.20.14**

**Agenda:**

1. Welcome – Shoshone-Paiute Tribal Chairman Lindsey Manning or designee  
Welcome – BLM District Manager Jim Fincher  
Process expectations – facilitator Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Tate Fischer, Manager
  - Hoffman/Duffy Dam Safety Modification Project Update
4. Bruneau Field Office – Tanya Thrift, Manager
  - Hole in the Rock (Update)
  - Hutch Springs Demonstration Project Tribal Comment Opportunity
  - Ruff and Ross Lake fencing project Update
5. Boise District Office – Jim Fincher, Manager

- Free Use Fire Wood Projects
- Tribal Inquiry involving official photography in Wilderness in Camas Creek/Pole Creek area

## 6. Idaho State Office

- Sage Grouse plan presented in July, 2014 – Brent Ralston/Kurt Weidenmann  
Tribal Comment Opportunity

## 7. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, October 16, 2014**

### Agenda(ad hocfrom 08.28.14):

1. Welcome and ad hoc process expectations – Doug McConnaughey
2. Owyhee Juniper fuel/fire project – Lance Okeson
3. Adjournment.
- 4.

### Agenda(from 08.21.14):

1. Welcome – BLM Boise District Manager Jim Fincher  
Welcome – Shoshone-Paiute Tribal Chairman Lindsey Manning  
Process Expectations – facilitator Douglas McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Tate Fischer, Manager
  - Hoffman/Duffy Dam Safety Modification Project (Introduction)
4. Bruneau Field Office – Tanya Thrift, Manager
  - Hole in the Rock Field Review Session  
(Follow-up item)
5. Owyhee Field Office – Michele McDaniel, Acting Manager
  - ARS Research Sites in Reynolds Creek (as reported by the tribes at the 7.23.14 Wings & Roots NAC)
6. Boise District Office – Jim Fincher, Manager
  - SW Idaho Juniper Utilization Working Group Update – Justin Boeck
7. Adjournment. Next regularly-scheduled Boise District Wings and Roots government-to-government hearing: **Thursday, September 18, 2014.**

### Agenda (from 07.23.14):

1. Welcome – Shoshone-Paiute Tribal Chairman Lindsey Manning or designee  
Welcome – BLM Boise District Manager Jim Fincher  
Process Expectations by facilitator Douglas McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Bruneau Field Office – Tanya Thrift, Manager
  - Boundary Fence at Ross and Ruff Lakes (Update)
  - Hole-in-the-Rock (followup)
4. Owyhee Field Office - - Michele McDaniel, Acting Manager



- South Mountain ARS Project (Introduction) - Lance Okeson and Courtney Wyatt
- Johnson Draw ARS Project (Introduction) – Lance Okeson and Karen Kumiega
- 5. Law Enforcement Update – Stan Buchanan, Chief District Law Enforcement Ranger (Executive Session)
- 6. CRUP for Bionomics Environmental Inc. for ITD Highway 93 Rehab project from Deep Creek to Hollister – Kurt Wiedenmann
- 7. Sage Grouse EIS Draft Proposed Plan Discussion/Update – Brent Ralson
- 8. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, August 21, 2014.**

**Agenda (from 06.19.14):**

1. Welcome – BLM Boise District Manager Jim Fincher
2. Welcome – Shoshone-Paiute Tribal Chairman Lindsey Manning or designee
3. Process Expectations by facilitator Douglas McConnaughey
4. Prayer break in the native tongue of this land – Ted
5. Four Rivers Field Office - Tate Fisher,, Manager
  - Nelson Mining Plan of Operation (POO) (Introduction) with BDO Geologist Valerie Lenhartzen
  - Big Willow Natural Gas Field Protective Leasing (Introduction) with Jon Beck
6. Bruneau Field Office – Tanya Thrift, Manager
  - Boundary Fence at Ross and Ruff Lakes
  - Re-cap discussion of June 11, 2014 Field Review Session
  - Hole in the Rock (follow-up)
  - Renewal Owyhee County Road and Bridge Sand and Gravel Free Use Permit
7. Owyhee Field Office – Michelle McDaniel, Acting Manager
  - Renewal of South Board of Control Sand and Gravel Free Use Permit
  - Renewal of Gem County Highway District Sand and Gravel Free Use Permit (Introduction)
  - Rat’s Nest Wild Horse Gather (Introduction) – Michelle McDaniel
8. Boise District Office – Jim Fincher, Manager
  - Bruneau Owyhee Sage Grouse Habitat Restoration (BOSH) Project (New item – Early Alert) – Jim Fincher and Mike McGee
  - TriState Fire and Fuels Management Project (New item-Early Alert) – Jim Fincher and Justin Boeck
  - Landscape Scale Inventory Assessment of Western Juniper (Introduction) Jim Fincher and Justin Boeck
9. Idaho State Office
  - CRUP Application Review – Bionomics Environmental Inc. for ITD Highway 93 Rehabilitation project from Deep Creek to Hollister  
Kurt Wiedenmann
- 10, Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, July 17, 2014 Postponed to July 23, 2014**

**Agenda (from 05.15.14):**

1. Welcome - Shoshone-Paiute Tribal Chairman Dennis Smith  
Welcome - BLM Boise District Manager Jim Fincher  
Process Expectations - Facilitator Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Four Rivers Field Office
  - Mineral Material Permit Renewals (Introduction) - Tate Fisher
4. Bruneau Field Office - Tanya Thrift, Manager
  - Riverstone International School Backpacking Special  
Recreation Permit Update
5. Owyhee Field Office - Loretta Chandler, Manager
  - Rabbit Creek Road Repairs and Expansion - Post

- Activity Archaeological Inventory (Update) - Michelle McDaniel
  - SIDRA - Dirt Inc. Hare and Hound National Event - (Update) - Michelle McDaniel
  - Owyhee SRP - Annual Event List (New Information) - Michelle McDaniel
6. Issues from the Idaho State Office
    - CRUP - ID-I3707 Craig S. Smith - Williams
    - Northwest Pipeline (Introduction) - Kurt Weidenmann
    - Sage Grouse EIS (Update) - Brent Ralston
  7. Adjournment. Next regularly-scheduled Boise District Office Wings and Roots Native American Campfire: **Thursday, May 15, 2014**

**Agenda (from 02.20.14):**

1. Welcome - BLM Boise District Manager Jim Fincher  
Welcome - Shoshone-Paiute Tribal Chairman Dennis Smith  
Process Expectations - Facilitator Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Four Rivers Field Office - Michelle Ryerson, Acting Manager
  - Mountain Home Highway District R&PP Application IDI-34559 (Introduction) with J  
john Sullivan
4. Bruneau Field Office - Tanya Thrift, Manager
  - Long term plan for horses from the Reservation entering BLM lands in the Riddle  
Allotment (Introduction)
  - Riverstone International School Backpacking Special Recreation Permit (Introduction)
  - Potential Helicopter Survey of Sage Grouse leks in Duck Valley
5. Owyhee Field Office - Michelle McDaniel, Acting Manager
  - Pickled Feet Ultra Running Wilson Creek Frozen 50 K  
(Update)
  - SIDRA - Dirt Inc.- Hare and Hound Motorcycle Race  
(Introduction)
  - Shovel probe testing work for Hemenway Butte proposed land sale - potential dates
6. District Office - Jim Fincher, Manager
  - Introduction of new GateWay West Idaho Project Lead Jim Tombaugh - Update on  
project
  - Handout (only) from ISO of State Protocol Revisions  
Which incorporates Tribal Comment. Tribal  
Comment Opportunity in near future
  - Executive Session on tribal land acquisition.
7. Adjournment. Next regularly-scheduled Boise District Wings  
And Roots Native American Campfire: ?

**Agenda (from 01.16.14):**

1. Welcome - Shoshone=Paiute Tribal Chairman Dennis Smith  
Welcome - BLM Idaho Acting State Director Tim Murphy  
Welcome - BLM Boise District Manager Jim Fincher  
Process Expectations - Facilitator Douglas McConnaughey
2. Prayer break - Sonny Thomas, Shoshone-Paiute Tribes
3. SPT tribal lands purchase initiative
  - First and Second phase requests
    - History
    - Further legal re quirements for objective completion UP mainline parcel  
(FKA: Id. Waste Systems land trade)
4. Tribal desires for proceeding - Chairman Smith

5. Adjournment. Next regularly-scheduled Boise National Forest Wings and Roots Native American Campfire: **Thursday, February 20, 2014**

**Agenda (from 12.13.13):**

1. Welcome - BLM Boise District Manager Jim Fincher  
Welcome - Shoshone-Paiute Tribal Chairman Dennis Smith  
Process Expectations - Facilitator Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. A lunch break will be observed from 11:55 AM to 1:15 PM
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Cultural site(s) on Idaho Army National Guard Orchard Training Area - Update: Patricia Roller
  - Idaho Mountain Guides SRP - Results of cultural survey - with Dean Shaw
  - Tribal Comment Opportunity
5. Owyhee Field Office - Loretta Chandler, Manager
  - Hemingway Butte Land Sale Tribal Comment Opportunity - Michelle McDaniel and Kelli Barnes
6. District office - Jim Fincher, Manager
  - Wilderness Management Plan - Update: John Sullivan
  - Owyhee Land Exchange - Update: John Sullivan
7. State Office
  - Idaho BLM/SHPO State Protocol Agreement: Kurt Weidenmann and Kirk Halford
8. Adjournment. Next regularly-scheduled Boise District Office Wings and Roots: **Thursday, January 16, 2014**

**Agenda (from 11.21.13):**

1. Welcome - Shoshone-Paiute Tribal Chairman Dennis Smith  
Welcome - BLM Boise District Manager Jim Fincher  
Process Expectations - Facilitator Doug McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard  
**A lunch break will be observed from 11:55 AM to 1:15 PM**
3. Four Rivers Field Office - Terry Humphrey, Manager
  - Idaho Mountain Guides SRP (Introduction)
4. Bruneau Field Office
  - CCC Springs Trespass (Introduction)
  - Hot Well Temporary Road Closure (Introduction)
  - Desert Rats and Desert Raider Motorcycle Race SRP's (Introduction)
5. Owyhee Field Office - Loretta Chandler, Manager
  - Hemingway Butte Land Sale (Introduction)
  - Pickled Feet Running Race SRP - (Introduction)
6. District Office - Jim Fincher, Manager
  - Gateway West Record of Decision (Information Only)
7. Idaho State Office - Tim Murphy, Acting Director
  - Sage Grouse Sub Regional Draft EIS
  - Idaho BLM/SHPO State Protocol Agreement
  - IDI-37613ITD CRUP Application
  - Shoshone-Paiute / BLM Master MOU and Transmission MOU
8. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, December 19, 2013 Re-scheduled for December 13, 2013.**

**Agenda (from 09.19.13):**

1. Welcome - BLM Boise District Manager Jim Fincher  
Welcome - Shoshone-Paiute Tribal Chairman Dennis Smith  
Facilitation Notes - Doug McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Four Rivers Field Office - Terry Humphrey, Manager

- Pottery site on Idaho Army National Guard Orchard Training Area - Tribal Comment Opportunity
- Paradigm Fuel Break Project - Cultural, Vegetation and Wildlife Reports - New Information - (tribal comment opportunity in Oct, 2013)
- Pony/Elk Complex Fire BAER Proposal-Update
- Weiser Complex Fire (New item)
- 4. Bruneau Field Office - Aimee Betts, Acting Field Manager
  - Bruneau Field Office Cattle Trailing Permits, Site 100E-1852 Evaluation - Update
  - Coordination on access through tribal property this fall - Update
- 5. Owyhee Field Office - Loretta Chandler, Field Manager
  - Replacement of Transmission Line Poles for Idaho Power Line 234 - Update
- 6. District Staff Topics - Jim Fincher, BDO Manager
  - Tribal response to the Owyhee Land Exchange Cultural Resource Inventory Contractor presentation (08.2.13) - including input to the list of variables being used in the Cultural Stratification Model - Tribal Comment Opportunity
  - Grazing Permit Donation (Information Only)
  - Wilderness Management Plan - Update
  - Gateway West Enhancement proposal (New item)
- 7. Adjournment. Next regularly-scheduled BDO Wings and Roots Native American Campfire: **Thursday, October 17,2013 (Cancelled due to Congressional shutdown).**

**Agenda (from 08.28.13):**

1. Welcome - Shoshone-Paiute Vice-Chairman Buster Gibson  
Welcome - BLM Boise District Manager Jim Fincher  
Facilitation Notes - Doug McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Four Rivers Field Office - Terry Humphrey
  - Cultural sites on Idaho Army National Guard Training Area
  - Paradigm Fuel Break Project
4. Bruneau Field Office - Aimee Betts, Acting Field Manager
  - Bruneau Field Office Cattle Trailing Permits, Site 12-1852 Evaluation
5. Owyhee Field Office - Loretta Chandler, Manager
  - Replacement of Transmission Line Poles on Idaho Power Line 234
  - Grazing Permit Renewal Update
  - Special Recreation Permits - Fathead Racing Motorcycle Event and Rough Rider Equestrian Poker Run
6. Boise District Office - Jim Fincher, Manager
  - Owyhee Land Exchange Cultural Inventory Contractor Presentation
  - Wildland Fire Update
  - Post Wildland Fire Cultural Resource Protection
7. Shoshone-Paiute Tribal issues: Ted Howard, Cultural Resources Protection Manager
  - CCC Springs destruction first brought to the BLM's attention by tribes - Gary Amen
  - Planned relocation of Owyhee Field Office from Marsing to Caldwell
  - Air and Ground monitoring patrol by tribes of cultural and archaeological sites in wildland fire locations
  - Status of all CRUP applications from January to August, 2013 (will be taken up under ISO issues)
8. Break
9. Idaho State Office Issues - Kurt Weidenmann, Resources and Sciences Branch Chief, Idaho State Office
  - Sub-regional Sage Grouse EIS Update - Brent Ralston, Project Manager
  - Transmission Line Tribal MOA status and Process to Move it to completion
10. Adjournment. Next BLM Boise District Office Wings and Roots Native American Campfire hearing: **Thursday, September 19, 2013**

**Agenda (from 07.17.13):**

1. Welcome - Boise District Manager Jim Fincher  
Welcome - Ted Howard for SPT Chairman Dennis Smith  
Facilitation Notes - Doug McConnaughey
2. Prayer Break in the native tongue of this land - Ted Howard
3. Boise District Office - Jim Fincher, Manager
  - Owyhee Land Exchange Cultural Resource Inventory Contract Update
  - Juniper Mountain Wildland Fire Management Strategy
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Four Rivers Resource Management Plan Update
  - Shoshone-Paiute Tribes Land Acquisition in Elmore Co
5. Bruneau Field Office - Aimee Betts, Acting Manager
  - BLM request for administrative access across tribal property near Pole Creek Wilderness
  - Bruneau Field Office Cattle Trailing Permits, Site 100E-1852 Evaluation
6. Owyhee Field Office - Loretta Chandler, Manager
  - Replacement of Transmission Line Poles on Idaho Power Line 234
7. Tribal Inquiries
8. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, August 15, 2013 Postponed at BLM request**

**Agenda (from 12.05.12):**

1. Welcome - Boise District Manager Jim Fincher  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Jim Fincher, Manager
  - Tribal Comment Opportunity:
    - CRUP Application-Statewide Permit, IDI-37129, Geo-Marine, Inc.
    - CRUP Application, Statewide Permit, IDI-37258, Logan Simpson Design, Inc.
    - BLM National Sage Grouse Planning Strategy - Comment on Alternatives
    - Revision of the 1998 State Protocol Agreement between the BLM and Idaho SHPO
  - Land Sale RMP Amendment - Tribal Acquisition
4. Bruneau Field Office - Mr. Arnie Pike, Manager
  - Hot Well Temporary Road Closure
5. Owyhee Field Office - Loretta Chandler, Manager
  - SIDRA Bar-to-Bar Motorcycle Race Route Change **Tribal Comment Opportunity**
    - Owyhee Endurance Ride **Tribal Comment Opportunity**
    - Pickled Feet Ultra Running Race (New Item)
    - Jump Creek Access Road Paving (New Item)
6. Four Rivers Field Office - Terry Humphrey, Manager
  - Brimson Trespass (“Early Alert, Information Only”)
7. Adjournment. Next regularly-scheduled BDO W&R NAC: **Thursday, January 17, 2013**  
(Postponed at BLM directive)

**Agenda (from 12.05.12):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Jim Fincher  
Mediation Notes - Douglas McConnaughey

2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Manager Jim Fincher
  - CRUP Application - Statewide Permit, IDI-37129; Geo-Marine, Inc.  
**Tribal Comment Opportunity**
  - CRUP Application - Statewide Permit, IDI-37258; Logan Simpson Design, Inc. **Tribal Comment Opportunity**
  - DOI Tribal Consultation Policy and Secretarial Order - Kurt Wiedenmann **Tribal Comment Opportunity**
  - Law Enforcement Ranger Protocol **Tribal Comment Opportunity**
  - BLM National Sagegrouse Planning Strategy **Tribal Comment Opportunity** on Alternatives
  - Firefighting on Public Lands by non-BLM entities RFP (Early Alert, Information Only) - Andy Delmas
  - Land Sale RMP Amendment/ Tribal Acquisition update
  - Owyhee Land Exchange (BLN/IDL land exchange) update
  - No activity this month: FRFO RMP - to be shared with tribes when WO review is initiated
4. Bruneau Field Office - Arnie Pike, Manager
  - Pixley Basin Fuels Project **Tribal Comment Opportunity**
  - Desert Rats motorcycle race (New Item)
  - Desert Raiders motorcycle race (New Item)
  - Ethno-Botany Interpretive Signs update
5. Owyhee Field Office - Loretta Chandler, Manager
  - Mounted Poker Ride
  - SIDRA Bar-to-Bar Motorcycle Race, Route Change
  - Owyhee Endurance Ride - Steph Teeter
6. Four Rivers Field Office - Terry Humphrey, Manager
  - Skinny Dipper Hot Spring Field Trip on October 10, 2012
7. Adjournment. Next regularly-scheduled Boise DO Wings and Roots government-to-government hearing: **Thursday, November 15, 2012.**

Agenda (from 09.20.12):

1. Welcome - BLM Acting Boise District Manager Arnold Pike  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Acting Manager Arnie Pike
  - CRUP Application-Statewide Permit, IDI-37129; Geo-Marine, Inc.
  - CRUP Application-Statewide Permit, IDI-37258, Logan Simpson Design
  - DoI Tribal Consultation Policy and Secretarial Order - Kurt Wiedenmann; **Tribal Comment Opportunity**
  - Law Enforcement/Ranger Protocol - **Tribal Comment Opportunity**
  - Fracking - Information that you need to know - New Item  
Idaho State Associate State Director Peter Ditton
  - Geophysical Exploration on Split Estate - Peter Ditton
  - Firefighting on Public Lands by non-BLM entities Update - Peter Ditton
  - BLM National Sage Grouse Planning Strategy - Overflight effects Update
  - Land Sale RMP Amendment/Tribal Acquisition - Update
  - Owyhee Land Exchange with Idaho Dept. of Lands Update
  - Tribal request for discussion regarding Field Review from May 17, 2013 at Garat Crossing with John Sullivan
4. Bruneau Field Office - Arnie Pike, Manager
  - Ethno-Botany Interpretive Signs **Tribal Comment Opportunity**
  - Pixley Basin Fuels Project (New item)
  - Protocol for protecting cultural sites in Drill Seeding Treatments - Gary Aman, SPT with GPS

- proposal Update
5. Owyhee Field Office - Loretta Chandler, Manager
    - Stage Road Spring Exclosure Fence Proposal - **Tribal Comment Opportunity**
    - Owyhee 68 Update: Group 1 EA comment period
    - Bar-to-Bar Motorcycle Race (New item)
    - Black Derby motorcycle race (New item)
    - Pole Creek Final Grazing Decision Update
  6. Four Rivers Field Office - Terry Humphrey, Manager
    - Skinny Dipper Hotspring
  7. Adjournment. Next regularly-scheduled BDO Wings and Roots NAC:  
**Thursday, October 18, 2013**

**Agenda (from 07.19.12):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Welcome - BLM Acting Boise District Manager Arnold Pike  
Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Arnie Pike, Acting Manager
  - Law Enforcement/Tribal Ranger Protocol Tribal Comment Opportunity
  - Update:
    - Land Sale RMP Amendment/Tribal Acquisition Request
    - DOI Tribal Consultation Policy and Secretarial Order - Kurt Wiedenmann
    - Owyhee Land Exchange (BLM/IDL lands exchange) - John Sullivan
  - Wildfire Update briefing
  - Idaho BLM Staffing Policies - Executive Session - Kurt Wiedenmann
4. Owyhee Field Office - Loretta Chandler, Manager
  - Group 1 Permit Renewal EA Update-
  - Group 2 EIS Update
5. Bruneau Field Office - Arnie Pike, Manager
  - Tribal Comment Opportunity:
    - Protocol for Protecting Cultural sites in Drill Seeding Treatments
    - Weed-Free Hay signs on the DV Reservation approaching BLM Wilderness lands
    - Mud Flat Road Kiosk Fence (New Item)
    - Ethno-Botany Interpretive Signs (New Item)
6. Morley Nelson Snake River Birds of Prey NCA - Patrician Roller, Manager
  - Con Shea Wildfire Road and Wees Bar Closure Update
7. Four Rivers Field Office - Terry Humphrey, Manager
  - Willow 3D Oil and Gas Geophysical Exploration Permit Application  
(New item for Information Only)
8. Adjournment. Next regularly-scheduled BDO Wings & Roots NAC:  
**Thursday, August 16, 2012.**

**Agenda (from 06.21.12):**

1. Welcome - BLM Acting Boise District Manager Arnold Pike  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office
  - Tribal Comment Opportunity:
    - CRUP IDI-37314 Plateau Archaeological Investigations -  
Kurt Wiedenmann
    - CRUP IDI-37311 Cardno Entrix App. - Kurt Wiedenmann
    - Law Enforcement Ranger Protocol
    - Owyhee State Exchange (BLM/IDL Land Exchange) SHPO Protocol
4. DOI Tribal Consultation Policy and Secretarial Order - Kurt Wiedenmann
5. BLM National Sage Grouse Planning Strategy - Brent Ralston

6. Land Sale RMP Amendment/Tribal Acquisition Request Update
7. Owyhee Field Office - Loretta Chandler, Manager
  - Owyhee "68" Permit Renewal Update
8. Four Rivers Field Office - Terry Humphrey, Manager
  - Gold Hill Reclamation ("New Item")
  - Blacks Creek Reservoir Management Plan ("New Item")
  - Big Willow OHV Designations for Packard Milkvetch Update4
  - Skinny Dipper Hot Springs Emergency Nighttime Use Restriction
9. Bruneau Field Office - Arnold Pike, Manager
  - Shoshone Brownware Drill Seeding Issue - BLM Response to Inquiry Memorandum Tribal Comment Opportunity
  - Protocol for Protecting Cultural sites in Drill Seeding Treatments Tribal Comment Opportunity
  - BLM Weed-free Hay Warning signs to be posted on Reservation
10. Birds of Prey National Conservation Area (NCA) - Patricia Roller, Manager
  - Con Shea Wildfire - effects upon Wees Bar
11. Adjournment. Next regularly-scheduled BDO Wings and Roots NAC:  
**Thursday, July 19, 2012.**

**Agenda (from 05.17.12):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes
  - Welcome - BLM Boise District Manager Aden Seidlitz
  - Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Honoring of Aden Seidlitz and Family by the Shoshone-Paiute Tribes as the new BLM New Mexico Associate State Director
  - Featuring the Painted Horse Drum and Singers
4. Boise District - Aden Seidlitz, Manager
  - CRUPS:
    - Tribal Comment Opportunity - CRUP IDI-37314 Plateau Archaeological Investigations
    - Introduction - CRUP IDI-37311 Cardno ENTRIX
  - Gateway West - BLM's Preferred Alternative Tribal Comment Opportunity (with project lead Walt George via phone)
  - Updates:
    - Land Sale RMP Amendment/Tribal Acquisition Request
    - Law Enforcement/Ranger Protocol - Final Draft
  - Distribution of the BLM's "Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners - 2012" ("New Item")
  - Ongoing Projects - No Activity this Month:
    - FRFO RMP
    - National Programmatic Agreement
    - BLM/IDL Land Exchange - SHPO Inventory Protocol
5. Owyhee Field Office - Loretta Chandler, Manager
  - Owyhee "68" Permit Renewal Update
6. Bruneau Field Office - Arnie Pike, Manager
  - Shoshone Brownware Drill Seeding Issue with BLM Response to Tribal Memorandum
  - Drill Seeding protocol
  - Tribal Response to BLM request to post Weed-Free Hay signs on the DV Reservation
  - Update by tribes regarding the Riverstone Tribal Educational Presentation Update
7. Adjournment. Next regularly-scheduled BDO Wings and Roots NAC: **Thursday, June 21, 2012.**

**Agenda (from 04.19.13):**

1. Welcome - BLM Boise District Manager Aden Seidlitz
  - Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes
  - Mediation Notes - Douglas McConnaughey



2. Prayer break in the native tongue of this land - Ted Howard
3. Cultural Resource Use Permits - Kurt Wiedenmann
  - Tribal Comment Opportunity:
    - IDI-37254 Idaho Power Company - Survey and Recordation Permit
    - IDI-37286 Pam Demo CRUP Permit
  - New CRUP:
    - Plateau Archaeological Investigations, IDI-\_\_\_\_\_.
4. District Office - Aden Seidlitz, Manager
  - Law Enforcement/Ranger Protocol
  - Updates to previously presented issues:
    - Gateway West Transmission Line RoW Update, BLM's Preferred Alternative - Walt George, via teleconference
    - Owyhee FO "68" Permit Renewal Update
    - BLM/IDL Land Exchange
  - Ongoing Projects - No Activity this month:
    - Land Sale RMP Amendment/Tribal Acquisition Request
    - FRFO RMP - To be shared with Tribes when DC review complete
5. Four Rivers Field Office - Terry Humphrey, Manager
  - M-3 Right of Way Tribal Comment Opportunity
  - Weiser-Galloway Dam Seismic Study RoW Application - Project Proponents present at 11:30 AM
  - New issues:
    - Bennett Mountain Livestock Permit Renewals
    - Goodrich Livestock Permit Renewals
    - McPhearson Livestock Permit Renewal
6. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
  - 5-acre Experimental Restoration Research Plot - Agricultural Research Service (ARS) - Cultural Reports
7. Bruneau Field Office - Arnold Pike, Manager
  - Tribal Comment Opportunity:
    - Riverstone International student backpacking hike
    - BLM Weed-Free Signs proposed to be posted on the DV Reservation
  - "Brown ware/Gray ware" Drill Seeding Issue and Protocol (New Item presented for tribal consultation)
  - Fire-Up Youth Program (Information only)
8. Owyhee Field Office
  - Dirt Inc. - Hare and Hound Motorcycle Race - Post race discussion
9. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire: **Thursday, May 17, 2012.**

**Agenda (from 03.15.12):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes
  - Welcome - BLM Boise District Manager Aden Seidlitz
  - Mediation Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Tribal Comment Opportunity:
    - "New Item for Consultation:"
      - IDI-37253 CRUP for Northwind - Syringa Fiber Optic Line near Bliss
      - IDI-37254 CRUP for Idaho Power Company - Survey and Recordation permit
      - IDI-37286 - CRUP for Pam Demo
      - Gateway West Transmission Line - BLM's Preferred Alternative with Walt George, National Project Lead via teleconference
    - "Updates:"
      - Livestock Trailing (All Field Offices)

- Owyhee "68" Permit Renewal
  - FRFO RMP
  - "Ongoing Projects - No activity this month:"
  - BLM/IDL Land Exchange
  - Land Sale RMP Amendment/Tribal Acquisition Request
  - Law Enforcement/Ranger Protocol
4. Four Rivers Field Office - Terry Humphrey, Manager
    - Weiser-Galloway Dam Seismic Study - ACOE and IDWR Archaeologist Scott Hall and Biologist Jason Achziger (ACOE) and Cynthia Clark (IDWR) Scheduled to come in at 12:30 PM
    - M-3 RoW Preliminary EA
  5. Bruneau Field Office - Arnie Pike, Manager
    - Riverstone International student backpacking hike Tribal Comment Opportunity - Dave Draheim
    - Weed-Free Hay signs in the Duck Valley Reservation - Lonnie Huter
    - "New Item for tribal consultation"
    - Brown Ware Drill Seeding issue and Protocol "Ongoing Project - Not Ready for Consultation"
  6. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
    - 5 Acre Experimental Restoration Research Plot-Agricultural Research Service (ARS) "Early Alert"
  7. Adjournment. Next regularly-scheduled BLM BDO Wings and Roots meeting: **Thursday, April 19, 2012.**

**Agenda (from 02.16.12):**

1. Welcome - BLM Boise District Manager Aden Seidlitz
  - Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes
  - Facilitator/Mediator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Owyhee "68" Permit Renewal - Group I Scoping Document Tribal Comment Opportunity
  - Black Mountain/Hardtrigger Herd Management Areas Capture, Treat and Release Gather
  - Scoping Document Tribal Comment Opportunity
  - Sage Grouse RMP Amendments Tribal Comment Opportunity
  - IDI 37253 - CRUP for Northwind - Syringa Fiber Optic Line near Bliss "New Item"
  - IDI-37254 - CRUP on Idaho Power Company - Survey and Recordation permit "New Item"
  - Livestock trailing (All field offices) - Section 7 Consultation Status
    - Update
    - Land Sale RMP Amendment/Tribal Acquisition Request
    - Owyhee "68" Permit Renewal Update
    - Law Enforcement/Ranger Protocol
    - No report, No Activity this month: BLM/IDL Land Exchange
4. Four Rivers Field Office - Terry Humphrey, Manager
  - M3 Eagle Right-of-Way update - Mark Tate - permit developer (approx. 11:30 AM)
  - FRFO RMP
  - Weiser-Galloway Dam Seismic Study - ACOE and IDWR ("New Item") (Archaeologist Scott Hall and biologist Jason Achziger - ACOE and Cynthia Clark - IDWR) (Approx. 12:30)(Postponed until March 2012)
5. Bruneau Field Office - Arnie Pike, Manager
  - Riverstone International Student Backpacking Hike ("New item") - Dave Draheim < BLM
  - Owyhee County Road and Bridge Free Use Permit (gravel pit) ("New item")- Forrest Griggs, BLM Geologist
6. Shoshone Brown Ware Drill Seeding Issue - Lois Palmgren, BLM Archaeologist
7. Adjournment. Next BLM BDO Wings & Roots NAC: "**Thursday, March 15, 2012**"

**Agenda (from 01.19.12):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Welcome - BLM Boise District Manager Aden Seidlitz  
Facilitator/Mediator's Note's
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - URS Renewal of current CRUP for archaeological inventory of the Gateway West Transmission Line Corridor; adding Jerry Doty, Michelle Stegner, Brian Wallace, Melinda Button, and Arran Bell. Tribal Comment Opportunity
  - Owyhee "68" Permit Renewal - Group 1 Scoping Document (Jake Vialpando, Team Lead) "New item"
  - Livestock Trailing (All Field Offices) - Section 7 Consultation Status "New Item"
  - Black Mountain/Hardtrigger Herd Management Areas Capture, Treat & Release Gather Scoping Document "New Item"
  - Sage Grouse RMP Amendments "New Item"
  - Ongoing Projects - No Activity This Month: "BLM/IDL Land Exchange"
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Ted Scharff Mining Plan Update - Centerville - ((Mr. Scharff has been invited and plans to attend)
  - Dry Buck Forest Restoration "New Item"
  - Gem County Road and Bridge "New Item"
  - Middle Fork Weiser River Free-Use Mineral Materials Permit "New Item"
  - M3 Eagle Right-of-Way "New Item"
5. Bruneau Field Office - Arnie Pike, Manager
  - Fuel Breaks to Maintain and Restore Sage Grouse Habitat - Tribal Comment Opportunity
  - Desert Rats Motorcycle Race - Tribal Comment Opportunity
  - Desert Raiders Motorcycle Race - Tribal Comment Opportunity
6. Owyhee Field Office - Loretta Chandler, Manager
  - SIDRA-Dirt, Inc. - Hare and Hound Motorcycle Race
7. Boise District Office - Executive Session
  - Owyhee Initiative Board Activity Update
8. Adjournment. Next regularly-scheduled meeting: **Thursday, February 16, 2012.**

**Agenda (from 12.06.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Introductions:
    - B2H Regional Team
    - Owyhee Field Office Manager Loretta Chandler
  - Tribal Acquisition (Receipt of Tribal Letter) Update (Group#1 - Owyhee River - Scoping Package) Pole Creek/Trout Springs
  - BLM/State of Idaho Land Exchange Update - Secretary's American Great Outdoors Priority Project
  - Law Enforcement Ranger Protocol Update - Doug
  - URS Renewal of current CRUP for archaeological inventory of the Gateway West Transmission Line Corridor - adding Jerry Doty, Michelle Stegner, Brian Wallace, Melinda Button and Arran Bell ("New Item for Tribal Consultation")
  - Livestock Trailing EA's/EIS "Early Alert"
  - Sage Grouse RMP Amendments "Early Alert"
  - Land Sale RMP Amendment "Early Alert"
5. Four Rivers Field Office - Terry Humphrey, Manager
  - Ted Scharff Mining Plan Update
6. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
  - Joint Fire Science Research Proposal Grant Funded for Fire Research on the NCA Tribal

Comment Opportunity

- Bruneau Duck Ponds Prescribed Burn (“New item for Tribal Consultation”)
- 7. Bruneau Field Office - Arnie Pike, Manager
  - Fuel Breaks to Maintain and Restore Sage Grouse Habitat Tribal Comment Opportunity
  - Desert Rats)Motorcycle Race Update
  - Desert Raiders Motorcycle Race Update
- 8. Owyhee Field Office - Loretta Chandler, Manager
  - Pickled Feet Ultra Running Event (“New Item for Tribal Consultation”)
- 9. Adjournment. Next regularly-scheduled BDO Wings and Roots NAC:  
**Thursday, January 19, 2011.**

**Agenda (from 10.25.11):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Welcome - BLM Boise District Manager Aden Seidlitz  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Signed CRUP Consultation MOU Update
  - Tribal Acquisition (Doug, Fred and Aden - Need to schedule outside meeting) Update
  - Permit Renewal Status/Strategy (group #1 - Owyhee River - Scoping Letter Update
  - Owyhee Field Manager Selection Update
4. Owyhee Field Office - Aden Seidlitz, Acting Manager
  - Strodes Basin Reservoir #1 (Final Decision dated March 22, 2002 to Alan Johnstone on the Strodes Basin Allotment Tribal Comment Opportunity
5. Morley Nelson Snake River Birds of Prey NCA - Tricia Roller, Manager
  - Joint Fire Science Research Grant Funded for Fire Research on the NCA
6. Bruneau Field Office - Arnie Pike, Manager
  - Fuel Breaks to Maintain and Restore Sage Grouse Habitat Update
  - Circle Pond Reconstruction Update
  - Desert Rats Motorcycle Race (New item for consultation)
  - Desert Raiders Motorcycle Race (New Item for consultation)
7. Four Rivers Field Office - Terry Humphrey, Manager
  - Centerville - Ted Scharf Mining Plan
8. Adjournment. Next regularly-scheduled BDO Wings and Roots NAC:  
**Thursday, November 17, 2011.**

**Agenda (from 09.28.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office
  - Law Enforcement/Ranger Protocol - Doug
  - Tribal Acquisition update ( Doug, Fred, Aden)
  - Permit Renewal Status/Strategy update
  - Owyhee Public Lands Management Act Implementation
  - Signed CRUP Consultation MOU
  - FY 2011 Fire & Emergency Stabilization and Rehabilitation Projects Update
4. Owyhee Field Office
  - Owyhee Outlaws Race (date change) update
  - Strodes Basin Reservoir #1 (Final Decision dated March 22, 2002 to Alan Johnstone on the Strodes Basin Allotment - Tribal Comment Opportunity
5. Morley Nelson Snake River Birds of Prey NCA - Tricia Roller, Manager
  - Joint Fire Science Research Proposal Grant Funded for Fire Research on the NCA
6. Bruneau Field Office - Arnie Pike, Manager
  - Fuel Breaks to Maintain and Restore Sagegrouse Habitat update

- Gordon King Unauthorized Fence and Trough (last discussed @ Wings & Roots on 05.19.11)  
Update
- Circle Pond Reconstruction - Tribal Comment Opportunity
- Riddle Ranches Land Exchange Tribal Comment Opportunity
- 7. Four Rivers Field Office - Terry Humphrey, Manager
  - Ted Scharff Mining Plan - Tribal Comment Opportunity
  - Weiser-Galloway Dam Study (“New item for Informational Purposes”)
- 8. Adjournment. Next regularly-scheduled Boise District Wings and Roots:  
**Thursday, October 25, 2011**

**Agenda (from 08.18.11):**

1. Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes  
Welcome - BLM Boise District Acting Manager Arnie Pike  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Owyhee Field Office
  - Tribal Comment Opportunity:
    - Nickel Creek Fence
    - Owyhee Outlaws Race
    - Bar-to-Bar Race
  - Strodes Basin Reservoir #1 (Final Decision dated March 22, 2002 to Alan Johnstone on the Strodes Basin Allotment) (“New item for Tribal Consultation”)
4. Bruneau Field Office - Acting Manager Aimee Betts
  - Riddle Ranches Land Exchange update
  - Mowing Project update
  - Pioneer Hike update
  - Circle Pond Reconstruction (“New item for Tribal Consultation”)
5. Four Rivers Field Office - Terry Humphrey, Manager
  - Paradigm Project (New Item for informational purposes)
6. Boise District Office - Arnie Pike, Acting District Manager
  - Tribal Acquisition update
  - Permit Renewal Status/Strategy
  - ISO-SPT CRUP Consultation MOU finalization
  - CRUPS Tribal Comment Opportunity:
    - : IDI-37070 NorthWind: Survey of proposed Syringa Fiber Optic line and Dietrich Water Line - Shoshone FO
    - IDI-37071 - Tetra Tech MSTI Inventory - Burley, Shoshone, Upper Snake Field Offices
    - IDI-37072 - URS: Kimama Training Range Inventory - Shoshone FO
    - IDI-37075 - WSA: JBR Fiber Optic Line Inventory - Jarbidge FO
    - No new applications this month
7. Vale District Oregon BLM - Don Gonzales, District Manager
  - Continuation of formal Government-to-Government Consultation Through the Wings and Roots Program - Don Gonzales
  - Environmental Assessment for Vegetation Treatments Using Herbicides on BLM Lands - Pat Ryan or Don Gonzales
  - Southeastern Oregon Resource Management Plan Amendment - Pat Ryan or Don Gonzales
8. Adjournment. Next regularly-scheduled BDO Wings and Roots meeting:  
**Thursday, September 15, 2011**

**Agenda (from 07.07.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz  
Welcome - Chairman Terry Gibson, Shoshone-Paiute Tribes

- Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
  3. Boise District Office - Aden Seidlitz
    - Tribal Comment Opportunity:
      - IDI-37069 - Idaho Power Co: Survey of Proposed Extension of Owyhee County 12.5 kV Distribution Line - Owyhee FO
      - IDI-37037 - Idaho Power Company: Survey of Line 128, Four Pole Replacements - Shoshone FO
      - IDI-37070 - NorthWind: Survey of Proposed Syringa Fiber Optic Line - Shoshone FO
      - IDI-37071- Tetra Tech: MSTI Inventory - Burley, Shoshone, Upper Snake Field Offices
      - IDI-37071 - URS: Kimama Training Range Inventory - Shoshone FO
      - IDI-37075 - WSA: JBR Fiber Optic Line Inventory - Jarbidge Field Office
      - CRUP Consultation MOU
      - Tribal Acquisition Update
      - Permit Renewal Status/Strategy Update
  4. Owyhee Field Office
    - SIDRA Race Field Trip Report and Proponent After-action Report
    - Tribal Comment Opportunity:
      - Nickel Creek Fence
      - Owyhee Outlaws Race
      - Bar-to-Bar Race
  5. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
    - Funk Farms Trespass Update
  6. Bruneau Field Office - Arnie Pike, Manager
    - Riddle Ranch Exchange Update
  7. Four Rivers Field Office - Terry Humphrey, Manager
    - Four Rivers FO DEIS Impacts Chapter (presented in W&R on 04.20.11)
  8. Adjournment. Next regularly-scheduled BDO Wings & Roots meeting:  
**Thursday, August 18, 2011**

**Agenda (from 05.19.11):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
 Welcome - BLM Idaho Associate State Director Peter Ditton  
 Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - CRUP Review - Kirk Halford, ISO Cultural Resources Lead:
    - IDI 36988 - Idaho Power (Four Rivers, Owyhee and Shoshone FO's) Multi ROW Renewal
    - IDI 366989 - Idaho Power (Jarbidge FO) NW Pipeline Cathodic station
    - IDI 37000 Cardno Entex (four Rivers FO) NW Pipeline
    - IDI 37001 Frontier Historical Consultants (Shoshone FO)
    - IDI 37010 Pam Demo
    - IDI 37007 Mark Plew to do work for the BLM
    - CRUP Consultation MOU
  - Updates:
    - IDI 36985 IPC ROW renewal - CRUP contracted to BYU (Burley and Jarbidge Field Offices)
    - Tribal Acquisition (Simco Road area)
    - Permit Renewal Status/Strategy
4. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
  - Funk Farms Trespass Update
5. Bruneau Field Office - Arnie Pike, Manager

- Report on Desert Rats and Desert Raiders Competitive Races
- King Trespass follow-up
- 6. SIDRA Race Field Trip Report / Proponent After Action Report (Delayed to June, 2011 W&R meeting)
- 7. Four Rivers Field Office - Terry Humphrey, Manager
  - Pumpkin Brainard Forest Restoration Project - Boise County.
- 8. Adjournment. Next regularly-scheduled BDO Wings and Roots meeting:  
**Thursday, June 16, 2011**

**Agenda (from 05.19.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz
  - Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes
  - Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Aden Seidlitz, Manager
  - Tribal Comment Opportunity:
    - Idaho Power Co. Potential Interconnect Salmon Wind Park, Jarbidge Field Office
    - Idaho Power Co. ROW renewal, Shoshone Field Office
    - Idaho Power Co. ROW renewal contracted to BYU, Burley and Jarbidge Field Offices
    - CRUP - Idaho Power (Four Rivers, Owyhee and Shoshone Field Offices Multiple ROW renewal
    - CRUP - Idaho Power (Jarbidge Field Office - NW Pipeline cathodic station)
    - CRUP - Cardno Entix (Four Rivers FO - NW Pipeline)
    - CRUP - Frontier Historical Consultants (Shoshone FO)
    - CRUP Consultation MOU
    - Owyhee County Travel Management Plan - Draft Criteria
    - BLM's Wild Lands Policy
    - Fundamental Reforms - Caring for America's Wild Horses and Burros
    - Motorcycle Races (Executive Session)
  - Big Horn Sheep/Domestic Sheep Update - Tim McKenzie
  - Tribal Acquisition Update - Simco Road area
  - Permit Renewal Status/Strategy
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Almaden Area Competitive Mineral Material Sale Tribal Comment Opportunity
  - Pumpkin Brainard Forest Restoration Project - Boise County "New Item for Consultation"
  - Big Willow OHV Closure "New Item for Informational Purposes"
5. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
  - Orchard Training Area - Dismounted Navigation Course - Withdrawn
  - Funk Farms Trespass ("Informational Purposes")
6. Bruneau Field Office - Arnie Pike, Manager
  - Lands with Wilderness Characteristics Inventory "New Item for Consultation"
7. Owyhee Field Office - Buddy Green, Manager
  - Fossil Butte Allotments Group Scoping Package Tribal Comment Opportunity
  - Nickel Creek FFR Allotment Scoping Package Tribal Comment Opportunity
  - Permit Renewal Update
  - Treasure Valley Trail Machine Motorcycle poker/fun ride
8. Adjournment. Next regularly-scheduled meeting: **Thursday, May 19, 2011**

**Agenda (from 03.17.11):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes
  - Welcome - BLM Boise District Manager Aden Seidlitz

- Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
  3. Boise District Office - Aden Seidlitz, Manager
    - CRUP - TetraTech (B2H Project) Tribal Comment
    - Owyhee County Travel Management Plan - Draft Criteria
    - BLM's Wild Lands Policy
    - Fundamental Reforms - Caring for America's Wild Horses and Burros
    - Permit Renewal Status ("New item")
    - Big Horn Sheep/Domestic Sheep Update
    - Tribal Acquisition Update (Simco Road area) - Doug/Fred
  4. Owyhee Field Office - Buddy Green, Manager
    - James Anderson Livestock Trespass/Impoundment/Sale Update
    - Spring Motorcycle Event - Dirt Incorporated Race - March 20, 2011
    - Fossil Butte Allotments Group Scoping Package ("New Item")
    - Nickel Creek FFR Allotment Scoping Package ("New Item")
  5. Four Rivers Field Office - Terry Humphrey, Manager
    - Almaden Area Competitive Mineral Material Sale ("New Item")
  6. Morley Nelson Snake River Birds of Prey NCA - Tricia Roller, Manager
    - Orchard Training Area - Dismounted Navigation Course ("New Item")
    - Orchard Training Area - Multi-Purpose Range Complex Heavy Parking Lot Expansion ("New Item")
  7. Bruneau Field Office - Arnie Pike, Manager
    - Deerwater Springs Update
  8. Adjournment. Next regularly-scheduled Boise District Wings and Roots Native American Campfire:  
**Thursday, April 21, 2011.**

**Agenda (from 02.17.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz
  - Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes
  - Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Tribal Comment Opportunity:
    - Secretarial Order #3310 - Protecting Wilderness Characteristics on Land managed by the BLM
    - OPLMA Wilderness Range Project Inventory Report
    - OPLMA Draft Interim Wilderness Grazing-Related Access Guidelines
    - Owyhee County Travel Management Plan
  - New item:
    - Permit Renewal Status - Executive Session
  - Update: Tribal Acquisition Simco Road Area - Aden Seidlitz
4. Bruneau Field Office - Arnie Pike, Manager
  - Updates:
    - Spring Motorcycle Events (includes events in Owyhee FO)
    - Deer Water (response to Tribal Ranger Report)
5. Morley Nelson Snake River Birds of Prey NCA - Tricia Roller, Manager
  - No activity, No Update this month: Orchard Training Area Navigation Course
6. Owyhee Field Office - Steve Jerrick, Acting Manager
  - Updates:
    - James Anderson Trespass/Impoundment
    - Murphy Flats (response to Tribal Ranger Report)
7. Adjournment. Next regularly-scheduled Boise District Wings and Roots Meeting: **Thursday, March 17, 2011**

**Agenda (from 01.20.11):**



1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Welcome - BLM Boise District Manager Aden Seidlitz  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Introduction of Idaho State Office Director Steve Ellis
  - District Office Personnel Update
  - Secretarial Order #3310 Protecting Wilderness Characteristics on Lands Managed by the BLM
  - BLM Cultural Use Permit Stipulations Revision - Kirk Halford -  
Tribal Comment Opportunity
  - Owyhee County Travel Management Plan Tribal Comment Opportunity
  - OPLMA Project Inventory Report ("New Item")
  - OPLMA Draft Interim Wilderness Grazing-Related Access  
Guidelines ("New Item")
  - Tribal Acquisition (Simco Road area) - Aden
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Treasure Valley Aero Modelers R&PP Lease ("New Item")
  - Little Willow Wetland Burn ("New Item")
5. Bruneau Field Office - Arnie Pike, Manager
  - Pasture 10B Monitoring ("New Item")
  - Bruneau Precision Bombing Range #4, U.S. Army Corps of Engineers
6. Morley Nelson Snake River Birds of Prey NCA - Patricia Roller, Manager
  - Proposed Fence Line Prescribed Burning of Accumulated Tumbleweeds EA for Fences in NCA  
and Bruneau FO Tribal Comment Opportunity
  - Craters Allotment Renewal ("New Item")
  - Orchard Training Area Navigation Course ("New Item")
7. Owyhee Field Office - Buddy Green, Manager
  - James Anderson Trespass
8. Adjournment. Next regularly-scheduled Boise District Wings and Roots meeting: **Thursday, February 17, 2011**

**Agenda (from 12.16.11):**

1. Welcome - BLM Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - Tribal Comment Opportunity:
    - Great Basin LCC Project (Introduced @ July W&R)
    - BLM Concurrence Signing of Hells Canyon FERC Programmatic Agreement - Don  
Gonzalez, BLM Vale District Manager
    - BLM National Programmatic Agreement - Kirk Halford, ISO Cultural Resources Lead
    - BLM Cultural Use Permit Stipulations Revision - Kirk Halford, ISO Cultural Resources  
Lead
    - Owyhee County Travel Management Plan - Aden Seidlitz
    - Geothermal Lease Nominations (Payette County-Parma and West of Weiser - Aden  
Seidlitz
  - District Proposed Action Updates - Aden Seidlitz:
    - IDL Anemometer (Wild Horse Death)
    - Sage Grouse Breeding Density Map
    - Tribal acquisition of BLM lands (Simco Road area)
    - State Director Introductory Meeting
    - Owyhee Public Lands Management Act
4. Morley Nelson Snake River Birds of Prey NC - Patricia Roller, Manager

- Proposed Fence Line Prescribed Burning of Accumulated Tumbleweeds EA for Fences in the Morley Nelson Snake River Birds of Prey NCA and Center Allotment with the Bruneau Field Office (“New Item for Tribal Consultation”)
5. Adjournment. Next regularly-scheduled Boise District Wings and Roots Meeting: **Thursday, January 20, 2011**. Next District *ad hoc* meetings: **Wednesday, January 19, 2011**.

**Agenda (from 11.18.10):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Welcome - BLM Boise District Manager Aden Seidlitz  
Facilitator’s Notes - Douglas McConnaughey
2. District Office - Aden Seidlitz, Manager
  - BLM’s National Programmatic Agreement (Email sent on 09.21.10)
    - Kirk Halford, Cultural Resources Lead, Idaho State Office  
Tribal Comment Opportunity
    - BLM Concurrence Signing of Hells Canyon FERC Programmatic Agreement - Don Gonzalez, BLM Vale District Manager  
Tribal Comment Opportunity
  - New Items presented for Informational Purposes:
    - Owyhee County Travel Management Plan - Aden Seidlitz
    - Tribal Cultural Resource Protection Plan Implementation -  
- Doug/ Ted/ Gary/ Aden
    - ID BLM Domestic Sheep/Big Horn Sheep Strategy
  - New Item presented for Tribal Consultation:
    - Geothermal Lease Nominations - Payette County (Parma) and West of Weiser
4. Owyhee Field Office - Aden Seidlitz for Buddy Green, Manager
  - Updates - Previously Presented:
    - Trout Springs Permit Renewal
    - Ridgeline Energy Anemometers Project
    - Silver Falcon Mining Overview
  - New Items presented for informational purposes:
    - James Anderson Trespass
    - Wild Horse Death on IDL Land
5. Bruneau Field Office - Arnie Pike, Manager
  - Update - Previously Presented:
    - Riddle Ranch Exchange
  - New Item presented for Tribal Consultation:
    - Turner Spring Exclosure Reconstruction due to Turn Fire
  - New Items presented for Informational Purposes
    - Billy Wolfe Land Exchange
    - Collette Land Exchange
6. Adjournment. Next regularly-scheduled Boise District Wings and Roots Meeting: Thursday, January 20, 2010

**Agenda (from 09.16.10):**

1. Welcome - BLM Boise District Acting Manager John Sullivan for Aden Seidlitz  
Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager
  - CRUP Application Four Rivers FO - Idaho Power Canyon Creek Distribution Line - FRFO Manager Terry Humphrey for Kirk Halford, Cultural Resource Lead Idaho State Office
  - Handout of 6 copies of FRFO RMP Chapter 3 for later comment - with no discussion today

4. Four Rivers Field Office - Terry Humphrey, Manager
  - Water District 65 Communications Site (“New item for consultation”)
5. Owyhee Field Office - Buddy Green, Manager
  - Silver Falcon ROW Application/Silver City Road Reconstruction
  - TRIBAL COMMENT
6. Bruneau Field Office - Arnie Pike, Manager
  - Magpie Creek Exclosure and Trough TRIBAL COMMENT
  - Turn Fire Burned Five Fingers Jump (Rehab Information)
7. Adjournment. Next Boise District regularly-scheduled meeting: **Thursday, October 21, 2010**

**Agenda (from 08.19.10):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
 Welcome - BLM Boise District Manager Aden Seidlitz  
 Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Aden Seidlitz, Manager
  - Southern Idaho BLM Infrastructure Development Conflict Map  
 Southern Idaho BLM Infrastructure Development Conflict Map - Placement and proposed language regarding cultural resources)Tribal Comment Opportunity
  - Draft CRUP Process Tribal Comment Opportunity
  - CRUP Application - Kristen Carlson (“New Item presented for Tribal Consultation)
4. Bruneau Field Office - Arnie Pike, Manager
  - East Castle Creek Projects Tribal Comment Opportunity
  - Magpie Creek Exclosure and Trough
5. Four Rivers Field Office - Terry Humphrey, Manager
  - Agua Caliente Temperature Gradient Well (Introduction)
  - Agua Caliente Access Road (Introduction)
  - Basin School District R&PP
  - M3/North Idaho Exchange Update
 Morley Nelson Snake River Birds of Prey Natural Conservation Area - Patricia Roller, Manager
  - Orchard Training Range Proposed Powerline Extension and Construction of 7 New Ranges  
 Tribal Comment Opportunity
  - Wees Bar Historic Cabin Stabilization (New item for Informational Purposes)
  - Wees Bar Deterioration Concerns by Shoshone-Paiute Tribes - Gary Aman, SPT Chief Tribal Ranger
6. Silver Falcon ROW Application/Silver City Road Reconstruction Tribal Comment Opportunity
7. Adjournment. Next Regularly-scheduled W & R meeting: **Thursday, September 16, 2010.**

**Agenda (from 08.19.10):**

1. Welcome - Acting Boise District Manager John Sullivan  
 Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
 Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - John Sullivan, Acting Manager
  - Great Basin Landscape Conservation Cooperative (“New Item for informational purposes) -  
 Mike Pellant
  - Southern Idaho BLM Infrastructure Development Conflict Map  
 Placement and proposed language regarding cultural resources Tribal Comment Opportunity
  - Secretary’s Wild Horse & Burro Initiative - Tribal Comment Opportunity
  - CRUP Process MOU presentation soliciting tribal comment at future meeting
4. Owyhee Field Office - Buddy Green, Manager
  - Wild Horse & Burro Capture, Treat and Release (“New item for Tribal Consultation”)
  - Silver Falcon ROW Application/Silver City Road Reconstruction

(“New item for Tribal Consultation”)

5. Bruneau Field Office - Tim Carrigan, Acting Manager
  - Riddle Ranch Land Exchange (“Update, previously presented”)
  - Magpie Spring Development (“New item for informational purposes”)
6. Four Rivers Field Office - Terry Humphrey, Manager
  - Idaho Waste Systems Land Exchange (IDI-36595) (“Update, previously presented”)
  - Orchard Training Range - Proposed Powerline Extension and Construction of Seven New Ranges Tribal Comment
7. Adjournment. Next regularly-scheduled meeting: **Thursday, August 19<sup>th</sup> OR September 16<sup>th</sup> ?**

**Agenda (from 06.25.10):**

1. Welcome - Chairman Robert Bear or his designee, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard, Shoshone-Paiute Tribes
3. Boise District - Aden Seidlitz, Manager
  - Southern Idaho BLM Infrastructure Development Conflict Map  
Tribal Comment - Placement and proposed language regarding cultural resources
  - Orchard Training Range - Proposed Powerline Extension and  
Construction of Seven New Ranges “New item presented for Tribal Consultation”
  - Secretary’s Wild Horse & Burro Initiative - “New Item for Tribal Consultation”
4. Four Rivers Field Office - Terry Humphrey, Manager
  - Langley Gulch Power Plant Rights-of-Way Tribal Comment
  - Idaho Waste Systems Land Exchange (IDI- 36595) “New item for Tribal Consultation”
7. Morley Nelson Snake River Birds of Prey Natural Conservation Area (NCA) - Patricia Roller, Manager
  - Request by tribes that all future proposed actions and undertakings on the OTA by the Idaho National Guard be brought forward for government-to-government consultation through the Wings and Roots program - Ted Howard, Shoshone-Paiute Tribes
8. Bruneau Field Office - Arnie Pike, Manager
  - Agnico-Eagle Limited (AEL) Mining Notice “New Item presented for Tribal Consultation”
9. Adjournment. Next regularly-scheduled meeting: **Thursday, July 15, 2010.**

**Agenda (from 05.20.10)**

1. Welcome - Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Manager Aden Seidlitz
  - Tribal Comment: Southern Idaho BLM Infrastructure Development Conflict Map - Placement and proposed language regarding cultural resources.
4. Owyhee Field Office - Manager Buddy Green
  - Tribal Comment: Ridgeline Energy Anemometer ROW
  - Silver Falcon Project Update
  - New items for information purposes...”:
    - Idaho Power Sale - 120 acres to Idaho Power near Hemingway Butte
    - Idaho FM radio station Right-of-Way - replace 199’ communication tower with a 699’ tower
    - Proposed Wild Horse & Burro Capture, Treat & Release
5. Bruneau Field Office - Manager Arnie Pike
  - Riddle Ranch Land Exchange Update
  - Agnico-Eagle Limited (AEL) Mining Notice (“New Item”)
6. Four Rivers Field Office - Acting Manager Patricia Roller
  - Langley Gulch Power Plant Rights-of-Way
  - “New items presented for informational purposes...”

- Fort Hall Hill Sanitation/Salvage Project
- M3 Proposed Land Exchange

7. Adjournment. Next regularly scheduled meeting: **Thursday, June 17, 2010.**

**Agenda (from 04.15.10):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Manager Aden Seidlitz
  - Southern Idaho BLM Infrastructure Development Conflict Map - Paul Makela (IDSO)
  - Idaho BLM CRUP Process - Jon Foster, Branch Chief, Resources & Sciences, and Kirk Halford, Cultural Resources Lead, (IDSO)
4. Four Rivers Field Office - Manager Terry Humphrey  
Tribal Comment requested:
  - Round Ridge Salvage - salvage trees infected with dwarf mistletoe
  - Summit Creek Drift Fence
5. Owyhee Field Office - Manager Buddy Green
  - Ridgeline Wind Energy Anemometer ROW
6. Bruneau Field Office - Manager Arnie Pike  
Follow-up to tribal requests:
  - Six year study of helicopter surveys of sage grouse leks in the Bruneau FO - Presentation by Helen Ulmschneider
  - Surveys for Pygmy Rabbits in the Bruneau FO, 2002 to Present  
Presentation by Helen Ulmschneider
7. Adjournment. Next regularly-scheduled meeting: **Thursday, May 20, 2010**

**Agenda (from 04.02.10):**

1. Welcome - Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Owyhee Field Office - Buddy Green, Manager
  - Silver Falcon Mining Access Road Right-of-Way ("BLM Comment Response") IDI-36545 "Update: previously presented"
  - Ridgeline Wind Energy Anemometer ROW - distribution of clearance reports. Tribal Comment requested at 04.15.10 W&R.
4. Bruneau Field Office - Arnie Pike, Manager
  - Deer Water Springs Tumbleweed Eradication and Control - Tribal Comment including Proposed Undertaking including Field Review session of 03.09.10
  - Riddle Ranch Land Exchange - "New Item" - Proposed exchange to acquire private land identified for acquisition in the Owyhee Initiative of the Omnibus Public Lands Management Act of 2009
5. Four Rivers Field Office - Terry Humphrey, Manager
  - Summit Creek Drift Fence "New Item"
6. Adjournment. Next regularly-scheduled meeting: **Thursday, April 15, 2010**

**Agenda (from 02.18.10):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Manager Aden Seidlitz
  - Tribal Comment: Silver Falcon Mining Access Road Right-of-Way (IDI-36545)

- Tribal Comment: "Director's Letter / 200802009 Tribal Consultation Listening Sessions Summary Reports/Strategy for Revision of the Programmatic Agreement Among the BLM, The Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers"
  - Ridgeline Wind Energy Anemometer ROW "New item presented for Tribal Consultation"
  - Boise District Cave Program Strategy "New item presented for informational purposes..."
4. Bruneau Field Office - Manager Arnie Pike
    - Deer Water Springs Tumbleweed Eradication and Control - removal of existing and control of future tumbleweed concentrations to protect pictographs. "New item presented for Tribal Consultation"
  5. Four Rivers Field Office - Acting Manager Mike O'Donnell
    - Round Ridge Salvage - the salvage of trees infected with dwarf mistletoe. "New items presented for Tribal Consultation"
  6. Adjournment. Next regularly-scheduled meeting: **Thursday, March 18, 2010.**

**Agenda (from 01.21.10):**

1. Welcome - Boise District Manager Aden Seidlitz
  - Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes
  - Facilitator's Notes - Douglas McConnaughey
2. Prayer break - in the native tongue of this land - Ted Howard
3. Boise District - Manager Aden Seidlitz
  - Silver Falcon Mining Access Road (IDI-36545) ("New Item for Consultation")
  - "Director's Letter / 2008-2009 Tribal Consultation Listening Sessions Summary Reports Strategy for Revision of the Programmatic Agreement Among the BLM, the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers" - "New Item presented for informational purposes"
4. Four Rivers Field Office - Acting Manager Mike O'Donnell
  - Ridgeline Wind Energy ("Update")
  - Higby Cave Closure ("New item presented for informational purposes")
5. "Shoshone-Paiute Tribal Cultural Resources Protection Authority" Tribal Update - Ted Howard
6. Adjournment. Next regularly-scheduled Boise District Wings and Roots meeting: **Thursday, February 18, 2010**

**Agenda (from 11.19.09):**

1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes
  - Welcome - Boise District Manager Aden Seidlitz
  - Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Aden Seidlitz, Manager
  - Gateway West ROW Update for the Bruneau/Owyhee Field Offices
  - Silver Falcon Mining Operation ("War Eagle Mountain/Silver City Road") Update
  - Tribal Comment: Road and Trail Maintenance Scoping Report for all field offices
  - Tribal Comment: Boardman to Hemingway ROW (BLM National Project Lead Lucas Lucero will join via teleconference -
    - Programmatic Agreement
    - Schedule
    - Phased Survey Plan
4. Adjournment. Next regularly-scheduled Boise District Wings and Roots meeting: **Thursday, December 17, 2009**

**Agenda (from 10.15.09):**

1. Welcome - Boise District Manager Aden Seidlitz
  - Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes

- Facilitator's Notes - Douglas McConnaughey
- 2. Prayer break in the native tongue of this land - Ted Howard
- 3. Boise District - Aden Seidlitz, Manager
  - Update: Bruneau and Owyhee FO's Gateway West ROW
  - Tribal Comment: Road and Maintenance Scoping Report
- 4. Bruneau Field Office - Arnie Pike, Manager
  - Tribal Comment Owens Well and Pipeline Field Review
  - Idaho Power ROW to Grasmere AF Emitter Site "New Item"
  - Idaho Power ROW to Riddle Ranch "New Item"
- 5. Four Rivers Field Office - Mike O'Donnell, Acting Manager
  - Tribal Comment: Idaho Power CPS 1797 Distribution Line (IDI36010)
 "New Items":
  - Idaho Power Jim Rogers Distribution Line extension (IDI-20019)
  - MacDonald Road Right-of-Way (IDI-36438)
  - Update: Idaho Power Saylor Creek Distribution line relocation (IDI-0353)
  - Chevron Pipeline Maintenance "New Item for Informational Purposes"
- 6. Owyhee Field Office - Buddy Green, Manager
  - Tribal Comment: Trout Springs/Pole Creek Permit Renewal/Juniper Treatment EA
  - Update: Ridgeline Energy follow-up (Contractor preparing Cultural Clearance)
- 7. Adjournment. Next regularly-scheduled meeting: **Thursday, November 19, 2009**

**Agenda (from 09.17.09):**

- 1. Welcome - Chairman Robert Bear or designee, Shoshone-Paiute Tribes  
 Welcome - Boise District Manager Aden Seidlitz  
 Facilitator's Notes - Douglas McConnaughey
- 2. Prayer break in the native tongue of this land - Ted Howard
- 3. Boise District - Aden Seidlitz, Manager
  - Boardman to Hemingway Powerline RoW Update
  - Gateway West RoW Update
  - Road and Maintenance Scoping Report for all field offices "New Item for Tribal Consultation"
- 4. Owyhee Field Office - Buddy Green, Manager
  - Idaho Power Company Hemingway to Bowmont 230 kV Transmission Line RoW Tribal Comment
  - Trout Springs/Pole Creek Permit Renewal/Juniper Treatment EA Update
  - Ridgeline Energy follow-up Update (contractor preparing the Cultural Clearance)
  - Silver Falcon Mining RoW application "New Item"
- 5. Four Rivers Field Office - Mike Truden, Acting Manager
  - Dewey Road Draft EA Tribal Comment
  - Idaho Power Saylor Creek powerline relocation Tribal Comment
  - FRFO RMP Status Update
  - Idaho Power CPS 1797 Distribution Line "New Item for Tribal Consultation"
- 6. Bruneau Field Office - Arnie Pike, Manager
  - Owens Well and Pipeline Project Update
  - Feral Horse Impoundment "New Item for informational purposes"
- 7. Adjournment. Next regularly-scheduled meeting: **Thursday, October 15, 2009**

**Agenda (from 07.16.09):**

- 1. Welcome - Boise District Manager Aden Seidlitz  
 Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
 Facilitator's Notes - Douglas McConnaughey
- 2. Prayer break in the native tongue of this land - Ted Howard
- 3. Boise District Office - Aden Seidlitz, Manager
  - Boardman to Hemingway Powerline ROW Update (for Bruneau/Owyhee FO's) Idaho Power Company representatives will also be standing-by to brief status of Community group

- efforts
  - Gateway West ROW Update
  - Wilderness Permittee Letter
- 4. Owyhee Field Office - Steve Jirik, Acting Field Manager
  - Ongoing Trout Springs / Pole Creek Permit Renewal - Juniper Treatment (Tribal Comment requested @ September Boise District Wings and Roots meeting)
  - Ridgeline Energy follow-up (Contractor preparing the Cultural Clearance) (“Update; previously presented”)
  - Idaho Power Co. Hemingway to Bowmont 230 kV transmission line Right of Way
- 5. Four Rivers Field Office - Mike Truden, Acting Field Manager
  - Dewey Road Draft EA (“New item presented for Tribal Consultation”)
  - Idaho Power’s Saylor Creek powerline relocation (“New item presented for Tribal Consultation”)
- 6. Bruneau Field Office - Arnie Pike, Manager
  - Owens Well and Pipeline Project (“Update - previously presented”)
  - Geothermal Leasing Nominations (“New item presented for informational purposes - including early alerts - further presentations may be made or requested”)
- 7. Adjournment. Next regularly-scheduled meeting: **Thursday, September 17, 2009**

**Agenda (from 06.18.09):**

1. Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District - Aden Seidlitz, Manager
  - Tribal Comment: Boardman to Hemingway Powerline ROW Scoping Report
  - Boardman to Hemingway Powerline ROW Update
  - Gateway West ROW Update
  - Radio Frequency Agreement New item presented for informational purposes
4. Owyhee Field Office - Buddy Green, Manager
  - Tribal Comment: Four Mile and Sands Basin Wild Horse gathers
  - Ridgeline Wind Energy Project Update
5. Four Rivers Field Office - Rosey Thomas, Manager
  - Tribal Comment: Orchard Training Area Warrior Road R/W (CIED Lanes)
  - Fat Tire Trail - Boise Foothills “New Item”
  - Bennett Mountain Aspen Restoration “New Item”
  - K-Round Fuels Reduction Project “New Item”
6. Bruneau Field Office - Arnie Pike, Manager
  - Tribal Comment: Hutch Springs Exclosure and Trough
  - Owens Pipeline “New Item”
7. Adjournment. Next regularly-scheduled meeting: **Thursday, July 16, 2009**

**Agenda (from 05.27.09):**

1. Welcome - Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Facilitator’s Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Manager Aden Seidlitz
  - Boardman to Hemingway Powerline ROW Update (Scoping Report, community advisory process and impact on NEPA process, Newsletter (handed out at 4/30 TFDO W & R Meeting)
  - Gateway West soil testing EA/RoW “new item presented for informational purposes” update - National Project Lead Walt George via telephone
  - Administration’s Energy Policy
4. Four Rivers Field Office - Rosey Thomas, Field Manager



- Nick's Spring - Tribal Comment
- Orchard Training Area Warrior Road R/W CIED lanes "New item presented for informational purposes"
- 5. Bruneau Field Office - Arnie Pike, Field Manager
  - Hutch Spring Development - "Update previously presented"
  - Spotted Frog, pygmy rabbit, weed control project funding of tribal proposals for Challenge Cost Share grants
- 6. Owyhee Field Office - Buddy Green, Field Manager
  - Four mile and Sands Basin wild horse gathers Tribal Comment
- 7. Adjournment. Next regularly-scheduled meeting: **Thursday, June 18, 2009**

**Agenda (from 04.30.09):**

1. Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Owyhee Field Office - Buddy Green, Manager
  - Tribal Comment: Idaho Power 500 kV powerline Right-of-Way (Hemingway substation)
  - "Ridgeline Energy" Wind Energy proposal "New item submitted for Informational Purposes"
4. Four Rivers Field Office - Rosey Thomas, Manager
  - Nick's Spring Wildlife Survey Requested "Item update - Previously presented"
  - Range Improvement Cooperative Agreement Samples "New item for Informational Purposes"
5. Bruneau Field Office - Arnie Pike, Manager
  - Hutch Spring Development "New item for tribal consultation"
  - Grasmere Airstrip Lease Renewal
6. Adjournment. Next regularly-scheduled meeting: **Wednesday, May 27, 2009**

**Agenda:**

1. Welcome - Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Bruneau Field Office - Arnie Pike, Manager
  - Station Springs Expansion Exclosure Expansion Tribal Comment
4. Owyhee Field Office - Buddy Green, Manager
  - "45 Ranch" project status of work completed
  - "45 Ranch" "Star Ranch" Use of AUM's
  - War Eagle Mine Project Update
  - Elephant Butte Land Sale Update
  - Jordan Valley Pellet Plant Update
  - Idaho Power Company 500 kV powerline on Hemingway 120 acre parcel "New item presented for Tribal Consultation"
5. Four Rivers Field Office - Rosey Thomas, Manager  
"New items for Tribal Consultation":
  - Dewey Road Right of Way IDI 32677
  - Brush and Homestead Springs maintenance and repair
  - Greenwood Ponds
  - Crater Rings Fence and Cattleguards
  - West Crane, East Pasture Trough addition
  - Nick's Spring
  - Rock Placing Co. Mineral Material Sale
  - Thorn Spring Redevelopment Tribal Comment
6. Boise District - Aden Seidlitz, Manager
  - Possible Date Change for May Wings and Roots meeting

7. Adjournment. Next regularly-scheduled meeting: **Thursday, April 16, 2009**

**Agenda (from 02.19.09):**

1. Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Welcome - Boise District Manager Aden Seidlitz  
Facilitator's notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Boise District Office - Aden Seidlitz, Manager  
- Boardman to Hemingway 500 kv RoW update with Lucas Lucero National Project Manager, and representatives of Idaho Power
4. Four Rivers Field Office - Rosey Thomas, Manager  
- Trueblood WMA and Bull Pasture prescribed burns Pre-decisional EA **Tribal Comment**  
- Thorn Spring Development Reconstruction ("new item submitted for tribal consultation")
5. Bruneau Field Office - Arnie Pike, Manager  
- Station Springs Mitigation (East Castle Creek Allotment) BLM to report on feasibility of moving water site and provide cultural site information.
6. Adjournment. Next regularly-scheduled meeting: **Thursday, March 19, 2009**

**Agenda (from 01.15.09):**

1. Welcome - Boise District Manager Aden Seidlitz  
Welcome - Chairman Robert Bear, Shoshone-Paiute Tribes  
Facilitator's Notes - Douglas McConnaughey
2. Prayer break in the native tongue of this land - Ted Howard
3. Four Rivers Field Office - Rosey Thomas, Manager  
- Update: Trueblood WMA and Bull Pasture Prescribed Burns -  
Predecisional EA (Tribal Comment is requested by BLM at February, 2009 Wings and Roots mtg  
- New items presented for tribal consultation:  
- Rural Telephone Co. Right-of-Way (FRFO-IDI 35851)  
- Idaho Power Co. R/W (FRFO-IDI 35851)
4. Bruneau Field Office - Arnie Pike, Manager  
- Station Springs Mitigation (East Castle Creek Allotment)
5. Adjournment. Next regularly-scheduled meeting: **Thursday, February 19, 2009**

**Agenda (from 12.04.08):**

1. Welcome – Robert Bear, Acting Shoshone-Paiute Tribal Chairman  
Welcome – Howard Hedrick, Idaho State Office Special Assistant to the Director, and Jennifer Arnold, Acting Twin Falls Dist. Manager  
Facilitator's Notes: Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Boise District  
- Update: BLM/IDL Land Exchange proposal in Owyhee County
4. Owyhee Field Office – Buddy Green, Field Manager  
- Tribal Comment: Mission Aviation Fellowship landing strip right-of-way
5. Four Rivers Field Office – Rosey Thomas, Field Manager  
- Tribal Comment:  
- FRFO Scoping Report  
- IDA-09155 Blair Extension right-of-way renewal  
- IDA-09667 Bennett Creek line right-of-way renewal  
- IDA-08151 Mountain Home TVOR line right-of-way renewal  
- IDA-08798 Morrow line right-of-way renewal  
- IDI-010264 Mountain Home microwave station right-of-way renewal  
- Crater Rings/Squaw Creek Allotment permit renewal  
- M3 CRUP application  
- Trueblood WMA and Bull Pasture prescribed burns  
"New items for Tribal Consultation"
6. Bruneau Field Office – Arnie Pike, Field Manager  
- East Castle Creek Permit Renewal EA Tribal Comment reported for the record – Ted Howard and Arnie Pike  
- Sagebrush mowing (fuels reduction along roads) "New items for tribal consultation"

- Break
7. Twin Falls District – Jennifer Arnold, Acting District Manager
    - Gateway West Transmission Line update – Walt George via teleconference
    - Mountain States Transmission Intertie (MSTI) – Mark Mackiewicz via teleconference
  8. Jarbidge Field Office – Rick VanderVoet, Manager
    - China Mountain Wind Project CRUP – Ester McCullough
  9. Burley Field Office – Mike Courtney, Manager
    - Cotterell Mountain Wind Energy Project update
  10. Adjournment. Next regularly-scheduled meeting for Boise District: **Thursday, December 18, 2008**. Next regularly-scheduled meeting for Twin Falls District: **Thursday, January 22, 2009**.

**Agenda (from 11.16.08):**

1. Welcome – BLM Boise District Manager Aden Seidlitz  
 Welcome – Shoshone-Paiute Tribal Chairwoman Nancy Egan  
 Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Boise District Office – Aden Seidlitz
  - Introduction of new Bruneau and Owyhee Field Managers and Bruneau Ass’t Fld Mgr
4. Bruneau Field Office – Arne Pike, Field Manager
  - East Castle Creek Permit Renewal Environmental Assessment (“New Items presented for Tribal Consultation”)
5. Owyhee Field Office – Steve Jirik, Acting Field Manager
  - Murphy Travel Management Plan Predecisional EA Tribal Comment
  - Mission Aviation Fellowship, air strip Right of Way application (“New items presented for Informational purposes – including early alerts – further presentations may be made or requested.”)
6. Four Rivers Field Office – Rosey Thomas, Field Office
  - Four Rivers Field Office Scoping Report Tribal Comment
  - Idaho Power powerline renewals (5) unspecified locations (“New items presented for tribal consultation.”)
  - Crater Rings Allotment permit renewal (“New items presented for tribal consultation.”)
7. Adjournment. Next regularly-scheduled meeting: **Thursday, November 20, 2008**

**Agenda (from 09.17.08):**

1. Welcome – Shoshone-Paiute Tribal Chairwoman Nancy Egan  
 Welcome – BLM Boise District Manager Aden Seidlitz  
 Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Rosey Thomas, Field Manager
  - Tribal Comment: C.J. Strike Narrows Recreation Site Hardening
  - Four Rivers FO RMP Scoping Report (“new item presented for informational mpurposes...”)
4. Owyhee Field Office – Steve Jirik, Acting Field Manager
  - Tribal Comment: 45 Ranch Dam and Irrigation Pipeline
  - Murphy Travel Management Plan Predecisional EA (“new item presented for tribal consultation...”)
  - Deep Rock Inc. Land Use Permit for hauling of mine tailings (“new item presented for informational purposes...”)
5. Boise District – Aden Seidlitz, District Manager
  - Tribal Comment – Right-of-Way Renewal Protocol for cultural clearances
6. Adjournment. Next regularly-scheduled meeting: **Thursday, October 16, 2008**

**Agenda (from 08.21.08):**

1. Welcome – BLM Boise District Manager Aden Seidlitz  
 Welcome – Shoshone-Paiute Tribes Chairwoman Nancy Egan  
 Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Boise District – Aden Seidlitz – District Manager

- Cultural Clearance Right-of-Way Renewals Protocol Tribal Comment
- 4. Owyhee Field Office – Steve Jirik, Acting Field Manager
  - Fossil Butte Permit Renewal EA Tribal Comment
  - Hardrock Mining road Right-of-Way application
  - Tribal Inquiry – R/W application for communication site for Canyon County Sheriff’s Office (heads up @ May Wings & Roots Meeting – consultation as of yet to be initiated)
- 5. Bruneau Field Office – Arne Pike, Field Manager
  - Mud Flat Oolite Interpretive Display (provide overview of interpretive signs and details of the parking area, preventative measures to avoid OHV parking and jump point).
- 6. Four Rivers Field Office – Rosey Thomas, Field Manager
  - Crater Rings Standards and Guides pre-decisional EA Tribal Comment
  - Goodrich Standards and Guides pre-decisional EA Tribal Comment
  - Sunstone CRUP Tribal Comment
  - Boardman to Hemingway Update
  - GF 15 Fence in OTA – Information requested by SPT at July Wings & Roots meeting
  - Oberbillig Acquisition on Boise Front (introduction)
  - Northwest Pipeline maintenance entire CRUP (new item for informational purposes)
  - King Hill WSA Route Closure
- 7. Adjournment – Next regularly-scheduled meeting: **Thursday, September 17, 2008**

**Agenda (from 07.17.08):**

1. Welcome – Shoshone-Paiute Tribes Chairwoman Nancy Egan  
 Welcome – BLM Boise District Manager Aden Seidlitz  
 Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Sunstone Natural Gas Pipeline Project Overview – Dick Todd, National Project Lead
4. Sunstone NGP CRUP Application – Howard Hedrick
5. Boardman to Hemingway Powerline Update – Brian McCabe
6. Cultural Clearance Protocol-Right-of-Way Renewals Tribal Comment
7. Four Rivers Field Office – Rosey Thomas, Manager
  - Four Rivers RMP Tribal Comment
  - Hell’s Canyon Complex Historic Properties Management Plan
  - Northwest Pipeline Corrosion Preventative Maintenance (new item)
  - Crater Rings Pre-Decisional EA Permit Renewal (new item)
  - Goodrich Pre-Decisional EA (new item)
8. Owyhee Field Office – Mark Lane, Manager
  - Rockville Grazing Permit Renewal EA and proposed Decision Tribal Comment
  - CH Mine Plan of Operation Tribal Comment
  - Berbes Gold Mine Plan of Operation update (previously presented)
  - Fossil Butte Group Pre-Decisional EA Permit Renewal (new item)
  - Goose Creek Milk Vetch Follow-up to tribal request
9. Adjournment. Next regularly-scheduled meeting: **Thursday, August 21, 2008**

**Agenda (from 06.19.08):**

1. Welcome – BLM Boise District Manager Aden Seidlitz  
 Welcome – Shoshone-Paiute Tribes Chair Nancy Egan or Ted Howard  
 Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Boise District – Aden Seidlitz, Manager
  - Tribal Comment: Cultural Clearance protocol for Right-of-Way Renewals (follow-up item)
4. Bruneau Field Office – Arne Pike, Acting Manager
  - New item presented for tribal consultation:
    - Mud Flat Oolite Interpretive Display cultural clearance
  - New items for informational purposes;
    - Idaho Power Distribution Line renewal – Agenbroad

- Idaho Power Distribution Line renewal – Taylor
- West Shoofly Plateau Unauthorized road closure
- 5. Four Rivers Field Office – Rosey Thomas, Manager
  - Update, previously presented:
    - Hells Canyon Complex Historic Properties Management Plan
  - New item presented for tribal consultation:
    - Four Rivers Resource Management Plan - Introduction and issue identification request
  - New item presented for informational purposes:
    - Hemingway to Boardman 500kv Transmission Line by Idaho Power
- 6. Owyhee Field Office – Mark Lane, Manager
  - Previously presented for which tribal comment is requested:
    - Palmer Grazing Permit Renewal EA and proposed decision.
  - New items presented for tribal consultation:
    - Teague Mining Company zeolite plan of operations.
    - Berbes plans of operation for gold mining (early alert)
    - Rockville Grazing Permit Renewal EA and Proposed Decision (early alert)
    - Owyhee Forks Juniper Cut (early alert)
  - New items presented for informational purposes:
    - Trout Springs Allotment – Update
    - Hemingway Butte Substation Land Exchange (early alert)
  - Tribal Inquiry: Mack’s Creek Ponds Field Review Session report and Status of BLM’s decision
- 7. State Office – Howard Hedrick, Special Assistant
  - Tribal Comment: Gateway West Project CRUP
- 8. Adjournment. Next regularly-scheduled meeting: **Thursday, July 17, 2008.**

**Agenda (from 05.16.07):**

1. Welcome – Ted Howard, Shoshone-Paiute Tribas  
Welcome – BLM Boise District Manager Aden Seidlitz  
Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. District-wide – Aden Seidlitz, District Manager
  - Cultural Clearance Protocol for Right of Way Renewals (follow up item)
4. Owyhee Field Office – Mark Lane, Manager
  - Tribal Comment:
    - R/W application for Jon Mortenson road connecting two properties
    - LUP application for Jon Mortenson for calf milk shed
    - Idaho Power temporary access road
    - Range Project – water Gap Spring Reconstruction
    - R/W application for communication site for Canyon Co. Sheriff’s office
5. Four Rivers Field Office – Rosey Thomas, Manager
  - Tribal Comment: Half Moon Ranch, LLC pipeline
6. Bruneau Field Office – Arne Pike, acting Manager
  - Tribal Comment: Teague Mining Plan of Operations
  - Update – Battle Creek Allotment Grazing Permit Renewal
  - Update – East Castle Creek Allotment Permit Renewal
  - Meyers Proposed Clay Sale
  - Informational purposes: West Castle Creek Allotment Grazing Permit Renewal
7. Adjournment. Next regularly-scheduled meeting: **Thursday, June 19, 2008**

**Agenda (from 04.17.08):**

1. Welcome – BLM Special Assistant Howard Hedrick Introduction of new Boise District Manager  
Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard

3. Four Rivers Field Office – Rosey Thomas, Manager
  - Half Moon Ranch LLC. pipeline Tribal Comment
  - Hulet Farm Management Road update
  - NCA RMP update
  - Glenns Ferry H/W District road R/W application
  - Rural Telephone Buried Fiber Optic Line R/W applications-2
  - Four Rivers RMP Introduction
  - Three new R/W applications w/o cultural clearances
  - Northwest Pipeline – temporary use permit
4. Bruneau Field Office – Arne Pike, Acting Manager
  - Teague Mining Plan of Operations
5. Owyhee Field Office – Mark Lane, Manager
  - Castlehead Lambert Research
  - Castlehead Lambert Juniper Removal
  - Idaho Power Temporary Access Road
  - Range Project – Water Gap Spring Reconstruction
  - Blackstock Dog Trails
  - Barking Spider Mountain Bike Race
  - Nampa Swat
  - Steph Teeter Owyhee Endurance Ride
6. Adjournment. Next regularly-scheduled meeting: **Thursday, May 15, 2008**

**Agenda (from 02.21.08):**

1. Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Welcome – BLM State Director Tom Dyer  
Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Bruneau Field Office – Dave Wolf, Acting Manager
  - Battle Creek Allotment Permit Renewal Process - Update
  - East Castle Creek Allotment Permit Renewal Process - Update
4. Owyhee Field Office – Mark Lane, Field Manager
  - Boone Peak Mechanical Hand Cut – Update
  - Silver City Mechanical Cut – Machine & Hand – Update
  - Wilson Creek TMP Implementation – Update
  - New Realty Actions
5. Four Rivers Field Office – Rosey Thomas, Field Manager
  - Three Point Mountain Trailhead EA – Update
  - Cascade Land Sales – Update
  - Tribal Request Response by BLM for cultural resource information for Rights of Way being renewed - Update
  - Elk Creek Watershed Restoration EA Introduction
  - South Grays Timber Salvage Project Introduction
  - Chief Parrish Timber Salvage Project Introduction
  - Half Moon Ranch Irrigation Pipeline Information only
  - Hulet Farm Management Co. road R/W Information only
6. Adjournment. Next regularly-scheduled meeting: **Thursday, March 20, 2008**

**Agenda (from 01.17.08):**

1. Welcome – BLM State Director Tom Dyer  
Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Facilitator’s Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Rosemary Thomas, Manager
  - EA/Federal Register Notice for closure of illegally-established Roads in the King Hill Creek WSA
  - Challenge cost share project with the Oregon and California Trail Association to develop a visitor’s map and guide of The Oregon Trail from Glenns Ferry to Bonneville Point.

- Movement of 8<sup>th</sup> Street Gate from its current location to a point ¼ mile upslope to allow public use of large, established 8<sup>th</sup> Street parking lot in the wintertime. Construction is expected to occur in February.
  - Realty actions, primarily renewals of existing ROW's for roads and power lines, 33 actions – detailed attachment forwarded to the tribes.
4. Bruneau Field Office
- Update Battle Creek EA and Proposed Grazing Decision
  - East Castle Creek Assessment and Evaluation/Determination
  - Desert Raiders Motorcycle Race SRP February 17, 2008
  - Desert Rats Motorcycle Race SRP April 27, 2008
5. Owyhee Field Office – Mark Lane, Manager
- Update Gusman Allotment
  - Update Boy Scout Camporee
  - Update Mack's Creek Ponds
  - Update "45' Ranch Irrigation Pipeline
- New items:
- Palmer Allotment
  - Fossil Butte Allotment
  - Sinker Butte Allotment
  - Montini Fenced Federal Range
  - Texas Basin FFR
  - Chipmunk Field FFR
  - Trout Springs Allotment
  - Castlehead Lambert Prescribed Burn
  - Sands Basin Allotment
  - Elephant Butte Allotment
  - Rats Next Allotment
  - Alkali Wildcat Allotment
  - Jackson Creek Allotment
  - Stanford FFR
  - Corral FFR
  - Blackstock Springs
  - Rockville Allotment
  - S. Mountain Area
  - Con Shea Allotment
  - Poison Creek Allotment
- Informational:
- Flint land sale mitigation work completion scheduled for June or July 2008
  - Discussion with OR-CA Trails Association Idaho Chapter proposal for placing markers for Skinner Toll Road 2008 or 2009 from Silver City to vicinity of
- JordanValley
- Hardtrigger Allotment Final Decision

**6. Adjournment. Next regularly-scheduled meeting: Thursday, February 21, 2008**

**Agenda (from 12.17.07):**

1. Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Welcome – BLM State Office Special Assistant Howard Hedrick  
Facilitator's Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. BLM – Shoshone-Paiute Tribes government-to-government consultation Protocol regarding permit renewals and time Expectations for Agenda item requests – Howard Hedrick and Ted Howard
4. Owyhee Field Office – Mark Lane, Manager
  - Tribal Comment: Mack's Creek Ponds Draft EA
  - Gusman Grazing Allotment Permit Renewal (including all previous agreements between the BLM and Owyhee County involving the allotment and Forrest Fretwell) This agenda item is at the request of the tribes and was requested for

consideration at the November 15, 2007 Wings and Roots NAC, which was cancelled by the BLM Boise District due to lack of agenda items.

- Hardtrigger Grazing Allotment Permit Renewal (including all Previous agreements between the BLM and Owyhee County involving this allotment. This agenda item is at the request of the tribes and was requested for consideration at the November 15, 2007 Wings and Roots NAC, which was cancelled by the BLM Boise District due to lack of agenda items.
  - Trout Springs permit renewal (consultation request by tribes)
  - Palmer permit renewal (consultation request by tribes)
  - Boy Scout Camporee at Silver City
  - Proposed pipeline at the "45" Ranch
4. Tribal request of the BLM Boise District Bruneau Field Office to initiate consultation on the Battle Creek Allotment and to expedite a briefing of the tribes regarding any and all proposed actions and undertakings for this allotment including a "friendly decision" for a 2-3 year closure on the Battle Creek/Shoofly Creek FFR, of which the tribes assert they have not been consulted.
  5. Wees Bar Recording Project Confidentiality Agreement – Howard Hedrick and Ted Howard
  6. Adjournment. Next regularly-scheduled meeting: **Thursday, January 17, 2008**

**Agenda (from 10.18.07):**

1. Welcome – BLM State Director Tom Dyer or Special Assistant Howard Hedrick  
Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Facilitator's Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Bruneau Field Office – John Biar, acting Field Manager
  - Sierra Del Rio request for Reservoir Maintenance on the Big Springs Allotment
4. Owyhee Field Office – Mark Lane, Field Manager
  - Mack's Creek Ponds Draft EA
  - 45 Ranch, Last Chance Cabin update
5. Four Rivers Field Office – Rosemary Thomas, Field Manager
  - Tribal Comment – Hornet Creek Fuels Management Project
  - Bruce Way Right-of-Way width clarification
  - Fire Rehab cultural clearance documents as requested by tribal representatives
6. State Office Multi-District Energy Rights-of-Way Briefing – Jim Buxton, BLM State Office
7. Adjournment. Next regularly-scheduled meeting: **Thursday, November 15, 2007 (Cancelled by the BLM due to lack of agenda items)**

**Agenda (from 08.16.07):**

1. Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Welcome – BLM State Director Tom Dyer or Special Assistant Howard Hedrick  
Facilitator's Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Rosey Thomas, Manager
  - Tribal Comment: Cascade Land Sales Draft EA
  - Tribal Comment: Cove Rec. Site Interpretive Sign Artwork (headdress question)
  - Wees Bar recording project (09.26.07 – 09.30.07): Number of people? Number of trips? Dates?
  - Hornet Creek Fuels Management Project Update (80 acres, 5 miles NW of Council, ID)
  - Bruce Way right-of-way Update: Clearance Report ready (project previously introduced in W&R in June, 2006)
  - Wees Bar Recording Project Confidentiality Agreement
4. Bruneau Field Office – John Biar, Acting Manager
  - Upper Castle Creek Juniper Hand Cut Final EA
5. Owyhee Field Office – Mark Lane, Manager
  - Hardtrigger/Black Mountain Wild Horse Gather – post gather report



- Mack's Creek Ponds (Introduction)

6. Adjournment. Next regularly-scheduled meeting: **Thursday, October 18, 2007**

**Agenda (from 07.19.07):**

1. Welcome – BLM State Director Tom Dyer or Special Assistant Howard Hedrick  
Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Facilitator's Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Boise District Office
  - Overview of fire season to date by Fire Management staff
  - Tribal inquiry requesting information and details involving demolition and changes to historic structures at the Mud Flat Guard Station. Tribal request for District lead Archaeologist to be in attendance.
4. Owyhee Field Office – Mark Lane, Field Manager
  - Tribal Comment: Hardtrigger/Black Mtn. wild horse gather EA
  - Tribal inquiry and request for information into Wildlife Conservation Projects in the vicinity of Mac's Creek
5. Four Rivers Field Office – Rosey Thomas, Field Manager
  - Cultural Survey results – King Road to Boise Basin Pathway, Idaho City (Bionomics)
  - Cascade Land Sales proposal – Draft EA for tribal review and eventual comment
  - Wees Bar Petroglyph recording project trip follow-up
  - Hornet Creek Fuels Management Project (80 acres located 5 miles NW of Council, Idaho) Introduction

6. Adjournment. Next regularly-scheduled meeting: **Thursday, August 16, 2007**

**Agenda (from 06.21.07):**

1. Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
Welcome – BLM State Director Tom Dyer (or Special Assistant Howard Hedrick)  
Facilitator's Notes – Doug McConnaughey
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Rosey Thomas, Field Manager
  - CJ Strike Road Improvement Tribal Comment
  - Cascade Land Sale Package Tribal Comment
  - Thorn Springs Development – additional information
  - West Fork Fence – additional information
  - Wees Bar Petroglyph Recording Project:
    - boat transportation for Elders
    - Draft Confidentiality Statement
    - camping and boat arrangements made with Celebration County Park for September, 2007
  - Unknown location CRUP application by ENTRIX, Inc.
  - Unknown location CRUP application by Dr. Mark Plew
4. Bruneau Field Office – John Biar, acting Field Manager
  - Bruneau RMP Preliminary Draft Special Designations Tribal Comment
  - Upper Castle Creek Juniper Cut Pre-decisional EA presented May 17, 2007 Tribal Comment
  - Update: East Castle Creek Allotment Conversion of Type of Livestock to Domestic Sheep in Pasture 17, Finding of Significant Impact and Proposed Decision Denying Application to Change Kind of Livestock from Cattle to Sheep
5. Owyhee Field Office – Mark Lane, Field Manager
  - Wild Horse Gather Tribal Comment
  - Palmer Juniper Cut – Introduction
6. Adjournment. Next regularly-scheduled meeting: **Thursday, July 19, 2007**

**Agenda (from 05.17.07):**

1. Welcome – BLM State Director (or Special Assistant Howard Hedrick)  
Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior

- Facilitator's Notes – Doug McConaughy
2. Prayer break in the native tongue of this land – Ted Howard
  3. Four Rivers Field Office – Rosey Thomas, Manager
    - Tribal Comment – Cove Recreation Site Interpretive Sign
    - Wees Bar Petroglyphs Recording Project Proposal
    - Initial Point human remains
    - Strike Dam Road CRUP cultural report
    - Cascade Land Sales Project (including a Plan Amendment)
    - Wild Horse gather
    - Thorn Spring Development
    - West Fork Division Fence
    - Crane Creek Stock Pond
    - Middle Creek Stock Pond
    - Smith Gulch Stock Pond
  4. Bruneau Field Office – John Biar, Assistant Field Manager
    - Tribal Comment: Pre-Decisional EA Conversion of Type of Livestock to Domestic Sheep in Pasture 17, East Castle Creek Allotment.
    - Tribal Comment: Riddle Allotment Reservoir Maintenance
    - Tribal Comment: Bruneau RMP for Special Designation Areas (requested by BLM at March 22, 2007 meeting)
    - Upper Castle Creek Juniper Cut Pre-Decisional EA. Previously presented in W&R on 04.19.07 as an early draft working document. Tribal Comment requested at 06.21.07 W&R meeting.
  5. Owyhee Field Office – Mark Lane, Field Manager
    - Boone Peak Mechanical Treatments
    - West Antelope Prescribed Fire
    - Castlehead Lambert Prescribed Fire
    - Upper Sheep Creek ARS Prescribed Fire
    - Flint Land Sale Excavation
    - Silver City Mechanical Treatments
    - Ridgeline Energy – wind energy application for Sands Basin and Shares Basin areas – Early Alert Information
    - Green Wing Pacific Energy Corporation – wind energy application for the Silver City area – Early Alert Information
    - Idaho Wind Energy – wind energy application for Tennessee Mountain area – Early Alert Information
    - Flint Mechanical Treatment
    - 45 Cabin update
  6. Adjournment. Next regularly-scheduled meeting: **Thursday, June 21, 2007.**

**Agenda (from 04.19.07):**

1. Welcome – Shoshone-Paiute Tribal Chairman Kyle Prior  
 Welcome – BLM Idaho State Director Tom Dyer (or Special Assistant Howard Hedrick)  
 Facilitator's notes
2. Prayer break in the native tongue of this land – Ted Howard
3. Four Rivers Field Office – Rosey Thomas, Manager
  - TRC Mariah CRUP
  - CJ Strike Road Improvement Report (Bionomics for ITD)
  - Cove Recreation Site sign
  - Horseshoe Bend to Garden Valley Transmission line R/W with changed alignment CRUP amendment for SAIC
  - Wees Bar Petroglyphs Recording Project
  - King Hill Wind Energy Development
  - Birds of Prey NCA RMP

- Higby Cave and Kuna Cave problems
- 4. Bruneau Field Office – John Biar, Acting Manager
  - Black Rock Minerals Area (from District Mgr. letter to the Tribes dated 02.08.07)
  - East Castle Creek Livestock Conversion
  - Riddle Allotment Reservoir Maintenance
  - CJ Strike 138 Kv Transmission line Interconnection
  - Bruneau RMP
  - Upper Castle Creek Juniper Cut
  - Monitoring and Data Collection Letter
- 5. Owyhee Field Office – Mark Lane, Manager
  - Upper Sheep Creek AR5 Prescribed Burn
  - Trout Springs Cut and Prescribed Burn
  - Wind Energy Applications
- 6. District-wide issues – Howard Hedrick, Special Assistant to the State Director
  - Greenhouse Assistance Project
  - Simco Road land information requests by the tribes
  - remaining items of consultation from the Letter to the SP Tribes dated 02.08.07
- 7. Adjournment. Next regularly-scheduled meeting: **Thursday, May 17, 2007.**

## Brent Ralston

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**From:** Brent Ralston  
**Sent:** Tuesday, November 11, 2014 7:43 PM  
**To:** Jeffery Foss; Paul Makela  
**Cc:** Timothy Murphy; Ethan Ellsworth; Scott Hoefer; Jonathan Beck  
**Subject:** RE: Question on sagegrouse

Jeff,

Yes, I have talked with the Tribe at the Wings and Roots venue about two issues: 1) the noise concern and the sonic booms which are suspected by the Tribe as causing mortality of chicks while developing within the egg; and 2) concern over the use of chaff and flares. The first occasion was in July 2012 where they raised the concern over military overflights. After that meeting I chatted with Paul regarding any know literature regarding this activities effects of mortality to sage-grouse and at that point there wasn't any that we found. I also spoke with Carl Rudeen at the Mountain Home Air Force Base and he shared the EA that the Base had done. The use of chaff and flares is a use authorized by FAA & FCC (as described in IB 2001-030) and evaluated in NEPA conducted by the Mountain Home Air Force Base (March 29, 2010 Environmental Assessment).

The bottom line is that BLM does not have any authority or say in military overflights which is authorized by the FAA or the use of chaff and flares which are also authorized by the FAA & FCC.

At the September 2012 Wings and Roots meeting I communicated that the GRSG EIS was not the appropriate venue to address this concern and that BLM did not have the authority – that the Tribes should coordinate/consult with the Air Force over these issues. That caused a small reaction that quickly blew entirely out of sorts with Doug (the facilitator) indicating that I had single-handedly destroyed the working relationship that previously existed and that he would be contacting Mike Poole and Tom Dyer to express this concern.

At this meeting I had also shared out preliminary alternatives, including the Governor's Alternative. After the initial reaction, Gary, who had been leafing through the material, brought up that we were indeed addressing noise, in that we had a management action specific to noise levels around leks. We talked about those management actions and that they would be applied to BLM authorized activities. That seemed to mollify the concern and the reaction seemed to blow over as I left with everything back on good terms. In addition we acknowledged the lack of any specific scientific studies relating to chick mortality and sonic booms and that this may be something for the Tribe with assistance from university researchers to develop a study to investigate.

In my subsequent meetings with Wings and Roots the concern over noise; i.e. sonic booms and mortality of chicks in the eggs; has come up at least two other time as more of an FYI for BLM without recognition that we have previously vetted this issue at the meeting previously and without any overt need for further BLM follow-up.

At my most recent meeting this came up again in the form of Ted 'telling a story' about his grandmother experience that jets flying above and the associated sonic boom would kill chicken chicks in the eggs. This seems to be the root of the concern without any scientific studies that would support this.

We will identify the sound concern in the EIS acknowledging the concern and the discussions and the need for further investigation but there will not be any discussion in effects analysis since that is and effect that cannot be verified and described for effects. For the chaff concern we will identify that concern as well in the cumulative effects description and reference the effects as described in the Air Force EA.

From IB 2001-030:

N. The BLM will work cooperatively with the military to minimize any effects from the use of chaff and flares. The BLM has no legal authority to regulate the use of chaff and flares; the military use of chaff and flares above public lands is regulated by the FAA and FCC. In the environmental hazards management sense, the use of chaff and flares over public lands is considered the valid use of a product(s) for its intended purpose. [Note: See "Definitions and Acronyms" attachment for explanation of the terms "chaff" and "flares."]

*Discussion: Chaff and flares, properly dispensed in accordance with military policy and procedures over public land have minimal to no impact. Improperly dispensed chaff or chaff canisters which malfunction can leave clumps of chaff on the ground and all chaff releases leave plastic end caps that degrade at a relatively slow rate. Chaff consists of aluminum coated fiber similar in size to human hair. To be effective, chaff is normally dropped at altitudes above 12,000 feet above mean sea level (MSL) and chaff is most often carried aloft in upper level winds for great distances (hundreds of miles). Properly dispensed chaff disperses so that it is non-detectable on the ground. The most recent study on the effects of chaff concluded that, although additional study is recommended, there are no known negative environmental or health effect from the use of chaff.*

*Properly dispersed flares travel less distance in the upper winds than chaff and burn out prior to hitting the ground, but may leave small amounts of debris. Wildfires have been known to start from unauthorized low level use of flares.*

*The use of chaff and flares near Congressionally designated areas or special management areas where the lands are managed so "the earth and its community of life are untrammelled by man and where man himself is a visitor who does not remain", e.g., wilderness areas, wilderness study areas, and wild segments of wild and scenic rivers, is an area of concern. In these areas, the release of chaff and flares below the authorized altitudes could potentially cause impacts that may not be in keeping with the congressional designation of these areas.*

*Where chaff and flares are being dispensed in the proximity of special management areas, the impacts of improperly dispensed chaff and flares need to be considered. BLM and military cooperation is paramount in meeting the intent of Congress relative to the management of special management areas.*

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Jeffery Foss [mailto:jfoss@blm.gov]  
**Sent:** Tuesday, November 11, 2014 5:40 PM  
**To:** Makela, Paul  
**Cc:** Timothy Murphy; Ethan Ellsworth; Scott Hoefler; Brent Ralston  
**Subject:** Re: Question on sagegrouse

I know Brent addressed this issue with the tribe-- I believe at a Wings and Roots meeting  
Jeff

Sent from my iPhone

On Nov 7, 2014, at 6:03 PM, "Makela, Paul" <[pmakela@blm.gov](mailto:pmakela@blm.gov)> wrote:

Tim,  
Regarding military over flights and GRSG, there is not a lot of info, but some. The attached Word document contains a section I copy/pasted from the June 2012 Mountain Home Air Force Base" Integrated Natural Resource Management Plan" that acknowledged a temporary response by GRSG could occur, and low level flights could cause stress. However in the mitigation

bullets they state that "Flight activities are dispersed across MOA airspace to reduce associated noise."

I am unable to locate other recent literature on the subject at this time, however the 2010 FWS 2010 Finding references timing limitations to military flights, at the Yakima Training Center in Washington, and says: "Leks have a 1-km (0.6-mi) buffer where all training is excluded, and aircraft below 91.4 m (300 ft) are restricted from midnight to 9 am from March 1 to May 15 (Stinson et al. 2004, p. 32)."

I am following up with a few colleagues. I will let you know if I find more.

Paul

----- Forwarded message -----

From: **Foss, Jeffery** <[jfoss@blm.gov](mailto:jfoss@blm.gov)>

Date: Fri, Nov 7, 2014 at 3:19 PM

Subject: Fwd: Question on sagegrouse

To: Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>, Paul Makela <[pmakela@blm.gov](mailto:pmakela@blm.gov)>, Ethan Ellsworth <[eellsworth@blm.gov](mailto:eellsworth@blm.gov)>

Cc: Scott Hoefer <[shoefer@blm.gov](mailto:shoefer@blm.gov)>

Paul, please discuss this with our folks and get back with Tim.

Thanks

Jeff

----- Forwarded message -----

From: **Timothy Murphy** <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>

Date: Fri, Nov 7, 2014 at 9:04 AM

Subject: Fwd: Question on sagegrouse

To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>

Please ask our WL leads for input here. Thanks

Sent from my iPhone

Begin forwarded message:

**From:** Buster Gibson <[gibson.buster@shopai.org](mailto:gibson.buster@shopai.org)>

**Date:** November 6, 2014 at 4:36:03 PM MST

**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>

**Subject: Question on sagegrouse**

Tim, another thought I have besides cultural resources monitoring post fire is has anyone studied the effects of the air force on sage grouse nesting/egg hatching I have heard stories from elders saying it has effected egg hatching in their chickens. As the air force operates over the entire strong hold for sage grouse northern Nevada, southern Idaho, and eastern Oregon. Just another thought

Thanks

Buster Gibson ,Vice-Chairman Shoshone-Paiute Tribes

--

**Jeff Foss**

**Deputy State Director- Resources, Idaho BLM**

**1387 S. Vinnell Way, Boise, ID 83709**

**208-373-3800**

**[jfoss@blm.gov](mailto:jfoss@blm.gov)**

--

**Paul Makela**

**Wildlife Program Lead**

**Idaho BLM State Office**

**Branch of Resources and Science**

**1387 S. Vinnell Way**

**Boise, ID 83709**

**Office (208) 373-3809**

**Fax (208) 373-3805 Fax**

**[pmakela@blm.gov](mailto:pmakela@blm.gov)**

**<Military\_Flights\_and\_GRSG\_MHAFB\_INRMPlan\_Excerpt.docx>**

## Excerpt from Final (June 2012) “Mountain Home Air Force Base Integrated Natural Resource Management Plan” Pages 4-16 and 4-17.

### MILITARY TRAINING- AIRCRAFT OVERFLIGHT, ORDNANCE DROPPING, COMBAT LASER USE

Aircraft overflight might affect sage-grouse. Noise is the predominant disturbance from aircraft overflight. Noise effects from aircraft overflight are infrequent nature and short duration in most of the MOAs (MHAFB, 2008B). During nighttime hours and during most daylight hours, hourly noise levels on days with military flight activity do not differ significantly from hourly noise levels on days without military flight activity. However, differences in hourly noise levels on the order of 10 dB occurred in a few late morning and early afternoon hours. Note that even during hours in which aircraft noise elevated ambient noise levels, average hourly equivalent levels remained lower than 40 dB (40 dB is the amount of noise produced by a refrigerator). Individual military aircraft sorties are occasionally noticeable and typically lasting tens of seconds. High level aircraft noise intrusions are rare events in MOAs. Hourly equivalent sound levels at most sites are generally lower than 40 dB. Although certain aircraft types often operated at high subsonic speeds in the MOAs, flight operations at supersonic speeds capable of producing sonic booms audible on the ground are rare events (Fidell Associates, Inc, 2003). Low-level flights are common near SCR [Saylor Creek Range] and JBR [Juniper Butte Range]. Low-level flights generate short duration, high intensity noise events as high as 140 dB (Table 4-2). Lowlevel flights are uncommon in the rest of the MOAs and are restricted by the parameters of the MOAs, JBRWA, ROD, SROD, SA and FAA regulations (See Appendix 11).

Upland game birds have not been found to vacate areas or experience reproductive losses in response to short-term exposure to aircraft noise or sonic booms (Manci et al. 1988). Manci et al. 1988 further summarized results from Lynch and Speake (1978) and Lamp (1989) indicating that gallinaceous birds are not known to be highly sensitive to aircraft noise. Sage-grouse may show a temporary response to overflights, but are expected to develop a tolerance to noise levels. Combat laser use won't affect sage-grouse. Laser targeting-equipped aircraft operate on SCR and JBR. Use of “combat” mode of operation is limited to specific targets. While the potential for an animal's exposure to the high intensity main beam of the laser cannot be totally discounted, it is considered to be highly improbable due to the specific series of events that would have to occur to result in such exposure. This series of events include being immediately adjacent to the target being lazed, directly looking at the approaching aircraft, and continuing to look at the aircraft during the targeting process (USAF, 1998). Ordnance dropping won't affect sage-grouse. The potential for an animal to be hit by ordnance is lower than for a combat laser. An effect from ordnance dropping is highly improbable.

**1. Direct Effects:** Noise from overflights in the MOAs is unlikely to affect sage-grouse. Noise from low-level flights may increase stress in sage-grouse. Fire caused by ordnance sparking rocks or targets within the target area on SCR and JBR may degrade sage-grouse habitat.

**2. Indirect Effects:** Invasive or nonnative species proliferation where disturbance has occurred from ordnance, increased fire potential from increase in invasive or nonnative species, and a decrease in sagebrush and native plants.

**3. Interrelated or Interdependent Actions:** Military Training- Aircraft Flare and Chaff Use; Military Training- Ground Operations; Range Clearance; Fire Suppression; Maintenance Activities.



**4. Cumulative Effects:** None. There are no related State or private activities reasonably foreseeable on MHRC.

#### **Mitigation Measures**

1. Use cold spot or no spot ordnance to reduce risk of fires on JBR and during fire season on SCR.
2. Use simulated ordnance dropping during high fire risk times.
3. Use fire ratings and restrictions to reduce the risk of fires.
4. Provide ordnance cleanup to reduce the likelihood of ordnance striking ordnance and creating sparks.
5. Employ firefighters on range during declared fire season to provide immediate initial response for fires.
6. Flight activities are dispersed across MOA airspace to reduce associated noise.

## Brent Ralston

---

**From:** Meredith Zaccherio  
**Sent:** Tuesday, December 09, 2014 10:00 AM  
**To:** Brent Ralston  
**Cc:** Jonathan Beck  
**Subject:** RE: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Yup! We have Section 3.18, Tribal Interests, so I can put it in that section.

### Meredith Zaccherio

EMPSi Environmental Management and Planning Solutions, Inc.  
26 O'Farrell Street, 7th Floor  
San Francisco, CA 94108  
tel: 415-544-0440 fax: 866-698-4836  
[www.EMPSi.com](http://www.EMPSi.com) Twitter: EMPSInc Facebook: EMPSi

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**From:** Brent Ralston [mailto:[bralston@blm.gov](mailto:bralston@blm.gov)]  
**Sent:** Monday, December 8, 2014 8:48 PM  
**To:** Meredith Zaccherio  
**Cc:** Jonathan Beck  
**Subject:** RE: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Meredith,

That sounds good. Do we have a Chapter 3 Tribal section that it might also be displayed in?

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Meredith Zaccherio [mailto:[meredith.zaccherio@empsi.com](mailto:meredith.zaccherio@empsi.com)]  
**Sent:** Monday, December 08, 2014 10:23 AM  
**To:** Brent Ralston  
**Cc:** Jonathan M Beck  
**Subject:** RE: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Hi Brent,

Yes, we can include this explanation. We don't have a tribal rights section in Chapter 4, but perhaps we could include it in the Native American Tribal Consultation section of Chapter 5?

Also, I received your AR CDs, so thank you for sending them!

Meredith

**Meredith Zaccherio**

EMPSi Environmental Management and Planning Solutions, Inc.  
26 O'Farrell Street, 7th Floor  
San Francisco, CA 94108  
tel: 415-544-0440 fax: 866-698-4836  
[www.EMPSi.com](http://www.EMPSi.com) Twitter: EMPSInc Facebook: EMPSi

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**From:** Brent Ralston [<mailto:bralston@blm.gov>]  
**Sent:** Tuesday, December 2, 2014 8:51 PM  
**To:** Meredith Zaccherio  
**Cc:** Jonathan M Beck  
**Subject:** Fwd: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Meredith,

Can we include this in some form in the tribal rights section of the EIS?

Sent from my iPad

Begin forwarded message:

**From:** Cheryle Zwang <[czwang@blm.gov](mailto:czwang@blm.gov)>  
**Date:** December 2, 2014 at 8:04:38 PM MST  
**To:** Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>  
**Cc:** Kurt Wiedenmann <[kwiedenmann@blm.gov](mailto:kwiedenmann@blm.gov)>, Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>  
**Subject:** Re: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Thanks Brent. I think your explanation is actually very good. I would hope that you could have something like it in the tribal rights and interests section or whatever section you have like that and/or in the response to comments section and/or the chapter two effects. So...kudos. and thanks.

Sent from my iPad

On Dec 1, 2014, at 8:35 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Cheryle,

That's a good question and things keep morphing to a certain extent. Our latest approach for land tenure is the elimination of outright disposal through sales – all GRSG habitat would be retained unless an exchange would result in a greater benefit to GRSG or their habitat. This approach would fit with a retention of land areas which in many cases is of critical importance to the Tribes. When it comes to

exchange site specific NEPA would be required which would include additional Tribal consultation to address their concerns and desires regarding specific parcels.

The no net loss standard applies to effects to GRSG from new development and does not specifically apply to land tenure – i.e. no net loss of acreage during exchange. The plan allows for differences in acreages for exchange based on GRSG values. For infrastructure the intent is to eliminate long term effects to GRSG to maintain populations.

I've spent some time in the Wings and Roots meetings answering their questions regarding the plan which has included the allocations for land tenure and mitigation. In my last visit we were given tacit approval of our plan with an associated offer for support and assistance during implementation.

We have shared the plan with the Sho-Ban as well but have not heard any additional concerns beyond their comments on the draft EIS which we have incorporated into the Final EIS.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

**From:** Zwang, Cheryle [mailto:[czwang@blm.gov](mailto:czwang@blm.gov)]  
**Sent:** Wednesday, October 22, 2014 2:56 PM  
**To:** Brent Ralston  
**Cc:** Kurt Wiedenmann  
**Subject:** Fwd: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Brent/Kurt, I am thinking that the tribes may not understand how their rights/interests will be affected as laid out here. I'm having a hard time telling. Help me out. For example, I see land tenure discussed under these different development scenarios but what does it mean relative to tribal rights/concerns - no net loss. It appears to me that we haven't laid that out for them. or am I missing something?

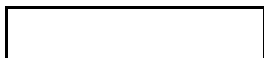
*[Cheryle Cobell Zwang](#)*

*[Idaho Bureau of Land Management](#)*

*[Deputy State Director, Communications](#)*

*[Ph: 208/373-4016](tel:2083734016) | [Fax: 208-373-4019](tel:2083734019) | [Email: czwang@blm.gov](mailto:czwang@blm.gov)*

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----- Forwarded message -----

From: **SOEmail, BLM\_ID** <[blm\\_id\\_soemail@blm.gov](mailto:blm_id_soemail@blm.gov)>

Date: Tue, Oct 14, 2014 at 1:09 PM

Subject: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

To: BLM\_ID\_Directives <[blm\\_id\\_directives@blm.gov](mailto:blm_id_directives@blm.gov)>, BLM\_ID\_SO\_ILT <[blm\\_id\\_so\\_ilt@blm.gov](mailto:blm_id_so_ilt@blm.gov)>

This IB provides information on the Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan. Questions or comments are due by October 24, 2014.

[GRSG ADPP](#)

Right click on the linked directive above, select "Copy link address" then paste this into Internet Explorer to open the directive.

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Monday, December 01, 2014 8:37 PM  
**To:** 'Gardetto, Jessica D (jdgardetto@blm.gov)'  
**Subject:** FW: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

For Tribal Consultation.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

---

**From:** Brent Ralston [<mailto:bralston@blm.gov>]  
**Sent:** Monday, December 01, 2014 8:35 PM  
**To:** Cheryle Zwang  
**Cc:** Kurt Wiedenmann; Jonathan Beck  
**Subject:** RE: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Cheryle,

That's a good question and things keep morphing to a certain extent. Our latest approach for land tenure is the elimination of outright disposal through sales – all GRSG habitat would be retained unless an exchange would result in a greater benefit to GRSG or their habitat. This approach would fit with a retention of land areas which in many cases is of critical importance to the Tribes. When it comes to exchange site specific NEPA would be required which would include additional Tribal consultation to address their concerns and desires regarding specific parcels.

The no net loss standard applies to effects to GRSG from new development and does not specifically apply to land tenure – i.e. no net loss of acreage during exchange. The plan allows for differences in acreages for exchange based on GRSG values. For infrastructure the intent is to eliminate long term effects to GRSG to maintain populations.

I've spent some time in the Wings and Roots meetings answering their questions regarding the plan which has included the allocations for land tenure and mitigation. In my last visit we were given tacit approval of our plan with an associated offer for support and assistance during implementation.

We have shared the plan with the Sho-Ban as well but have not heard any additional concerns beyond their comments on the draft EIS which we have incorporated into the Final EIS.

Brent Ralston  
Greater Sage-Grouse Planning Lead  
Idaho and Southwestern Montana Subregion  
Idaho State Office  
208-373-3812

**From:** Zwang, Cheryle [<mailto:czwang@blm.gov>]  
**Sent:** Wednesday, October 22, 2014 2:56 PM  
**To:** Brent Ralston

Cc: Kurt Wiedenmann

Subject: Fwd: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

Brent/Kurt, I am thinking that the tribes may not understand how their rights/interests will be affected as laid out here. I'm having a hard time telling. Help me out. For example, I see land tenure discussed under these different development scenarios but what does it mean relative to tribal rights/concerns - no net loss. It appears to me that we haven't laid that out for them. or am I missing something?

*Cheryle Cobell Zwang*

*Idaho Bureau of Land Management*

*Deputy State Director, Communications*

*Ph: 208/373-4016/ Fax: 208-373-4019 / Email: [czwang@blm.gov](mailto:czwang@blm.gov)*

*Follow BLM Idaho on Social Media*



----- Forwarded message -----

From: **SOEmail, BLM\_ID** <[blm\\_id\\_soemail@blm.gov](mailto:blm_id_soemail@blm.gov)>

Date: Tue, Oct 14, 2014 at 1:09 PM

Subject: IB No. ID-2015-001, Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan, DD: 10/24/2014

To: BLM\_ID\_Directives <[blm\\_id\\_directives@blm.gov](mailto:blm_id_directives@blm.gov)>, BLM\_ID\_SO\_ILT <[blm\\_id\\_so\\_ilt@blm.gov](mailto:blm_id_so_ilt@blm.gov)>

This IB provides information on the Idaho Southwestern Montana Greater Sage-Grouse Administrative Draft Proposed Plan. Questions or comments are due by October 24, 2014.

[GRSG ADPP](#)

Right click on the linked directive above, select "Copy link address" then paste this into Internet Explorer to open the directive.

**Brent Ralston**

---

**From:** Brent Ralston  
**Sent:** Tuesday, December 02, 2014 9:53 PM  
**To:** Gardetto, Jessica  
**Subject:** Re: Latest SG Tribal Consultation

Yes, we can. Our relationship with the tribe is more inclusive due to the government to government aspect and does not require a CA agreement.

Sent from my iPad

On Dec 2, 2014, at 2:40 PM, "Gardetto, Jessica" <[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)> wrote:

Can we give them advance review of the FEIS? I thought we couldn't since the tribe didn't sign on as a cooperating agency...

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

----- Forwarded message -----

From: **Kraayenbrink, Joseph** <[jkraayenbrink@blm.gov](mailto:jkraayenbrink@blm.gov)>  
Date: Tue, Dec 2, 2014 at 2:37 PM  
Subject: Re: Latest SG Tribal Consultation  
To: "Gardetto, Jessica" <[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)>  
Cc: Karen Rice <[krice@blm.gov](mailto:krice@blm.gov)>, Sarah A Wheeler <[sawheeler@blm.gov](mailto:sawheeler@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>

We have not had any additional formal G to G, but a Tribal member on the RAC has been kept informed at every RAC meeting (3 per year) on what the current status and timelines are. There is no plans to do another formal G to G unless they request one, after we give them advance notice of the FEIS release, before the release to the general public.

On Tue, Dec 2, 2014 at 12:50 PM, Gardetto, Jessica <[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)> wrote:

Hi Joe, Karen and Sarah,



I was just talking with Brent about the latest sage-grouse planning effort tribal consultation and I was just wondering if you have talked with the Sho-Ban tribe about the sage-grouse planning effort recently. I have October 30, 2013 documented as the last time they received an update on SG, when Brent went to one of the meetings with you all.

It's perfectly fine if you haven't discussed the SG planning effort with them since then, I just want to make sure that I have the latest information on my tracking sheet, just in case. :)

I know you're busy, so I apologize for giving you one more email to respond to.

Thank you very much!

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

--

Joe Kraayenbrink  
District Manager  
Idaho Falls District  
208-524-7540

## Brent Ralston

---

**From:** Gardetto, Jessica  
**Sent:** Tuesday, December 02, 2014 2:41 PM  
**To:** Brent Ralston  
**Subject:** Fwd: Latest SG Tribal Consultation

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Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

----- Forwarded message -----

**From:** Kraayenbrink, Joseph <[jkraayenbrink@blm.gov](mailto:jkraayenbrink@blm.gov)>  
**Date:** Tue, Dec 2, 2014 at 2:37 PM  
**Subject:** Re: Latest SG Tribal Consultation  
**To:** "Gardetto, Jessica" <[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)>  
**Cc:** Karen Rice <[krice@blm.gov](mailto:krice@blm.gov)>, Sarah A Wheeler <[sawheeler@blm.gov](mailto:sawheeler@blm.gov)>, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)>

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(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

--

Joe Kraayenbrink  
District Manager  
Idaho Falls District  
208-524-7540

## **Brent Ralston**

---

**From:** Kraayenbrink, Joseph  
**Sent:** Tuesday, December 02, 2014 2:38 PM  
**To:** Gardetto, Jessica  
**Cc:** Karen Rice; Sarah A Wheeler; Brent Ralston  
**Subject:** Re: Latest SG Tribal Consultation

We have not had any additional formal G to G, but a Tribal member on the RAC has been kept informed at every RAC meeting (3 per year) on what the current status and timelines are. There is no plans to do another formal G to G unless they request one, after we give them advance notice of the FEIS release, before the release to the general public.

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Hi Joe, Karen and Sarah,

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I know you're busy, so I apologize for giving you one more email to respond to.

Thank you very much!

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060

Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

--  
Joe Kraayenbrink  
District Manager  
Idaho Falls District  
208-524-7540

**Brent Ralston**

---

**From:** Gardetto, Jessica  
**Sent:** Tuesday, December 02, 2014 12:51 PM  
**To:** Joseph Kraayenbrink; Karen Rice; Sarah A Wheeler  
**Cc:** Brent Ralston  
**Subject:** Latest SG Tribal Consultation

Hi Joe, Karen and Sarah,

I was just talking with Brent about the latest sage-grouse planning effort tribal consultation and I was just wondering if you have talked with the Sho-Ban tribe about the sage-grouse planning effort recently. I have October 30, 2013 documented as the last time they received an update on SG, when Brent went to one of the meetings with you all.

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Thank you very much!

Jessica Gardetto  
Office of Communications  
Idaho BLM  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-4060  
Cell: (208) 957-1355  
[jdgardetto@blm.gov](mailto:jdgardetto@blm.gov)

**Tribes receive a copy of the Executive Summary, Plus  
Volumes I and II.**

IDMT\_PUB\_12648  
3.6

John Murray  
Tribal Historic Preservation Officer  
Blackfeet Tribe  
P.O. Box 850  
Browning, Montana 59417

Kyle Prior, Council Chairman  
Duck Valley Shoshone-Paiute Tribe  
P.O. Box 219  
Owyhee, NV 89832-0219

Tribal Chairman  
Confederated Salish & Kootenai Tribes  
42487 Complex Blvd.  
P.O. Box 278  
Pablo, Montana 59855

Chief Allan, Chairman  
Coeur d'Alene Tribe  
850 A Street, Plummer ID 83851

Shoshone-Bannock Tribes  
c/o Danny Stone and Hunter Osborne  
P.O. Box 306  
Fort Hall, ID 83203

Kootenai Tribe  
c/o Billy Barquin and Patty Perry  
PO Box 1269  
Bonners Ferry, Idaho 83805

Tribal Chairman  
Kootenai Tribe  
PO Box 1269  
Bonners Ferry, Idaho 83805

Nez Perce Tribe  
c/o Michael Lopez and Aaron Miles  
P.O. Box 305  
Lapwai, ID 83540

Tribal Chairman  
Coeur d'Alene Tribe  
850 A Street  
Plummer, Idaho 83851

Tribal Chairman  
Blackfoot Nation  
Spirit Talk Culture Institute  
P.O. Box 477  
East Glacier, In the Blackfoot Nation 59434-0477

Ira Matt  
Tribal Historic Preservation Officer  
Confederated Salish and Kootenai Tribes  
P.O. Box 278  
Pablo, Montana 59855

Shoshone Tribe of the Wind River Reservation  
C/O Wilfred Ferris  
P.O. Box 217  
Fort Washakie, Wyoming 82514

Tribal Chairman  
Shoshone Tribe of the Wind River Reservation  
P.O. Box 217  
Fort Washakie, Wyoming 82514

Chairman Nathan Small  
Shoshone-Bannock Tribes  
P.O. Box 306  
Fort Hall, ID 83203

Ted Howard, Cultural Resources Director  
Duck Valley Shoshone-Paiute Tribe  
P.O. Box 219  
Owyhee, NV 89832-0219

Tribal Chairman  
Nez Perce Tribe  
P.O. Box 305  
Lapwai, ID 83540

Alfred Nomee, Natural Resource Director  
Coeur d'Alene Tribe  
850 A Street  
Plummer, Idaho 83851

Heather Keen and Tiffany Allgood  
Coeur d'Alene Tribe  
850 A Street  
Plummer, Idaho 83851

Cleve Davis  
Environmental Coordinator  
Shoshone-Bannock Tribes  
P.O. Box 306  
Fort Hall Idaho 83203







## Brent Ralston

---

**From:** Hendricks, Kathleen  
**Sent:** Thursday, December 18, 2014 10:15 AM  
**To:** Brent Ralston  
**Subject:** Fwd: Request for Greater Sage-grouse Conservation Effort Database Entries!

FYI email I sent to Jon....in case you also want to share with staff/partners. I'm trying to swamp the potential list of folks who may be able to enter conservation efforts

Kathleen G. Hendricks  
Conservation Partnerships  
1387 South Vinnell Way  
Boise, Idaho 83709  
208-378-5742 work  
208-866-7467 cell

----- Forwarded message -----

**From:** **Hendricks, Kathleen** <[kathleen\\_hendricks@fws.gov](mailto:kathleen_hendricks@fws.gov)>  
**Date:** Thu, Dec 18, 2014 at 9:28 AM  
**Subject:** Request for Greater Sage-grouse Conservation Effort Database Entries!  
**To:** Jonathan Beck <[jmbeck@blm.gov](mailto:jmbeck@blm.gov)>

Hi Jon

In an effort to make sure everyone has entered conservation efforts into the database please distribute the below email to any staff/partners to notify them there is still time to respond. Thanks-----Kathleen

Dear Sage-grouse Conservation Partner,

We are writing to you to remind and encourage you to submit data about your conservation efforts that benefit greater sage-grouse to our online Conservation Efforts Database (CED), and to contact us if you are having any difficulty in doing so.

Last week, Congress passed a spending bill that includes specific provisions for greater sage-grouse. These provisions do not change the Service's obligation to determine, whether the species still warrants protection under the ESA by September 30, 2015. The spending bill does not affect our ability to develop, implement, and analyze conservation efforts to support the species. **Meaning we must continue to transition from the process of data collection to data analysis.**

We recognize that an unprecedented number of conservation efforts are occurring throughout the 11-state range of greater sage-grouse and that many of you have completed or will soon complete projects and plans that benefit greater sage-grouse. We need your continued help in capturing this information so that we can understand how your efforts have addressed threats to the species. Under the ESA, we are required to accept all information submitted prior to our decision, but the practical reality is that the earlier we receive it, the more fully we will be able to integrate it into our decision-

making process. Therefore, we are urging you to provide relevant information into the CED by year's end, and **no later than January 15<sup>th</sup>, 2015**. To register and provide data, as well as locate additional information about the CED, please visit: <https://conservationefforts.org>.

We also recognize that not all of our partners will be able to fulfill this request by January 15, 2015. Under the ESA, the Service is required to - and in fact will - consider all the information received up to the point of our decision. However, the nature of how we consider information and how it is incorporated in our analysis may be affected by when the service receives that information. If you are unable to complete data entry in the Conservation Efforts Database by **January 15<sup>th</sup>**, please contact us immediately so that we may try to assist you. Please contact:

- Kathy Hollar at [Kathy.Hollar@fws.gov](mailto:Kathy.Hollar@fws.gov), 503-231-6156; or
- Lief Wiechman at [Lief.Wiechman@fws.gov](mailto:Lief.Wiechman@fws.gov), 307-772-2374, x236

In addition, we would like to ask for your assistance in passing this email and attachment onto other conservation partners in your state/area that have also accomplished conservation efforts for greater sage-grouse. The Bureau of Land Management, US Forest Service, Natural Resource Conservation Service, Farm Service Agency, and State Fish and Wildlife Agencies have provided, or are in the process of providing, information to the CED for projects that they have funded. However, other partners such as county commissioners, sage-grouse local working groups, soil and water conservation district offices, cattlemen's associations, private landowners and others who may have also completed greater sage-grouse conservation projects independent of those efforts, and we want to ensure that they also have the opportunity to enter their projects in the CED.

On behalf of the Service's greater sage-grouse team, Thank you for your assistance in providing the Service with the best scientific and commercial data available to help us complete our status review, and thank you for your efforts to conserve greater sage-grouse.

Kathleen G. Hendricks  
Conservation Partnerships  
1387 South Vinnell Way  
Boise, Idaho 83709  
208-378-5742 work  
208-866-7467 cell

**Brent Ralston**

---

**From:** Gilliard, Artealia  
**Sent:** Tuesday, April 21, 2015 10:04 AM  
**To:** BLM\_All\_Employees  
**Subject:** Reminder: Learn about the BLM's Greater Sage-Grouse Planning Effort Today at 1:00 p.m. EST  
**Attachments:** WebEx\_Invitation.pdf

Good afternoon:

Please join us for a Webex webinar and learn more about The BLM's Greater Sage-Grouse Planning Strategy today, Tuesday, April 21 from 1:00 - 2:00 p.m. EST. This interesting presentation will be led by Stephanie Carman, BLM's Greater Sage-Grouse Project Coordinator, and is a great way to learn more about the BLM's effort to conserve and restore Greater Sage-Grouse habitat.

WebEx Session ID: 649 130 474

Password: Sage1

To join the WebEx session online click <http://bit.ly/sagegrousewebex> or paste the link directly into your internet browser and follow the instructions that appear on your screen. To join the session by phone dial: (888) 391-6587, Passcode: 1472468. For technical assistance, please contact: Andy Rojo at [arojo@blm.gov](mailto:arojo@blm.gov) or (602) 906-5542.

## Brent Ralston

---

**From:** Graves, Sylvia  
**Sent:** Tuesday, April 21, 2015 9:39 AM  
**To:** BLM\_ID\_SO\_LLID930000\_All  
**Subject:** Fwd: Learn about BLM's Greater Sage-Grouse Planning Strategy  
**Attachments:** Five Things About Greater Sage Grouse\_FINAL.pdf; WebEx\_Invitation.pdf

This will be held in the Eagle Room at 11 am if you are interested.

Sylvia V. Graves  
Administrative Specialist  
BLM - Idaho State Office  
1387 S. Vinnell Way  
Boise, ID 83709  
(208) 373-3800

----- Forwarded message -----

**From:** Roberson, Edwin <[eroberso@blm.gov](mailto:eroberso@blm.gov)>  
**Date:** Mon, Apr 20, 2015 at 4:03 PM  
**Subject:** Learn about BLM's Greater Sage-Grouse Planning Strategy  
**To:** BLM\_All\_Employees <[blm\\_all\\_employees@blm.gov](mailto:blm_all_employees@blm.gov)>  
**Cc:** Artealia A Gilliard <[agilliard@blm.gov](mailto:agilliard@blm.gov)>, Randall Eardley <[reardley@blm.gov](mailto:reardley@blm.gov)>, Stephanie Carman <[scarman@blm.gov](mailto:scarman@blm.gov)>, "Lueders, Amy L" <[alueders@blm.gov](mailto:alueders@blm.gov)>, Jon Raby <[jraby@blm.gov](mailto:jraby@blm.gov)>, Steven A Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>

Good morning:

The BLM manages more Greater Sage-Grouse habitat than any other government agency. Our work to ensure the overall health and vitality of sagebrush ecosystems is critical to Greater Sage-Grouse and other species that depend on sagebrush for survival. Also, sagebrush grasslands are a cornerstone of the West's ranching industry and many rural western communities rely on the economic boost provided by healthy sagebrush landscapes. We recognize the importance of our efforts to improve conservation for sage-grouse habitat and we are doing our part to make a difference for the Greater Sage-Grouse.

The BLM has developed a strategy to sustainably manage sagebrush ecosystems through our planning system. The strategy establishes science-based conservation measures that limit disturbance to critical habitat, restore and enhance sagebrush landscapes and work together to reduce the impacts of fire. And this summer, the BLM will finalize 15 Environmental Impact Statement, including six Resource Management Plan revisions and 68 land use plan amendments that incorporate appropriate measures to conserve and restore sage-grouse habitat.

All of you are invited to learn more about the BLM's Greater Sage-Grouse Planning effort. Please join Stephanie Carman, the BLM Greater Sage-Grouse Project Lead, for a Webex on Tuesday, April 21 from 1:00 - 2:00 p.m. EST. This interesting Webex presentation is a great way to learn more about the unprecedented planning effort the BLM has undertaken to protect sage-grouse and its habitat.

Look for more information and features on the BLM Daily that will highlight the hard work BLMers across the country are putting into the Greater Sage-Grouse planning effort. Thank you.

## Brent Ralston

---

**From:** Roberson, Edwin  
**Sent:** Monday, April 20, 2015 4:04 PM  
**To:** BLM\_All\_Employees  
**Cc:** Artealia A Gilliard; Randall Eardley; Stephanie Carman; Lueders, Amy L; Jon Raby; Steven A Ellis  
**Subject:** Learn about BLM's Greater Sage-Grouse Planning Strategy  
**Attachments:** Five Things About Greater Sage Grouse\_FINAL.pdf; WebEx\_Invitation.pdf

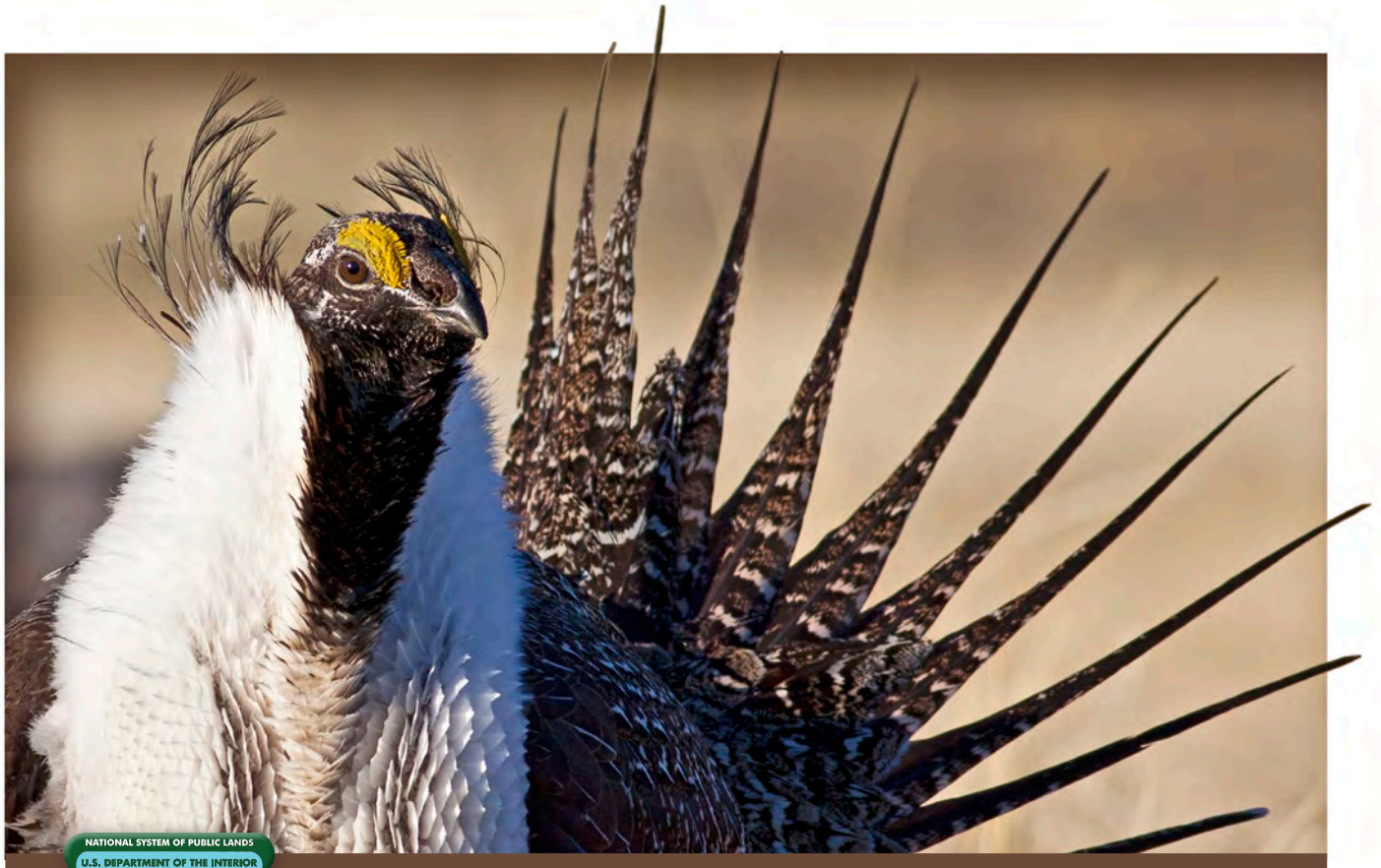
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Look for more information and features on the BLM Daily that will highlight the hard work BLMers across the country are putting into the Greater Sage-Grouse planning effort. Thank you.



## 5 Things About BLM's Greater Sage-Grouse Planning Strategy

- 1 Greater Sage-Grouse depend on sagebrush for survival:** Greater Sage-Grouse live in sagebrush-steppe or sagebrush shrublands, which are ideally large, intact and mostly treeless landscapes with sagebrush, native bunchgrasses, wildflowers and wet meadows. The habitat also supports more than 350 wildlife species. Threats to Greater Sage-Grouse habitat, including habitat fragmentation, fire and invasive species make it one of the most imperiled of all ecosystems in the United States.
- 2 Healthy landscapes support diverse uses:** Sagebrush grasslands are a cornerstone of the West's ranching industry and many rural western communities rely on the economic boost provided by healthy sagebrush landscapes. We are working to protect both an iconic landscape and a way of life in the West.
- 3 The BLM can make a difference for sage-grouse:** The BLM is responsible for more than half of the nation's remaining sage-grouse habitat across 11 western states. The BLM is working to restore the health and resilience of sage-grouse habitat. We're building on the work of our partners and incorporating the best available science to inform resource management decisions.
- 4 BLM's Greater Sage-Grouse Planning Strategy is the start of something big:** The BLM has established a planning strategy to improve and restore vital sage-grouse habitat. The strategy establishes science-based conservation measures that limit disturbance to critical habitat, restore and enhance landscapes and work together to reduce the impacts of fire. This summer, the BLM will finalize six Resource Management Plans, 14 Environmental Impact Statements and 68 land use plan amendments.
- 5 You're the key to the success of the strategy:** BLM's mission is to manage and conserve public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield. We are committed to doing the right thing to protect both the Greater Sage-Grouse and sagebrush habitat.





**Tuesday, April 21**

**1:00 - 2:00 p.m. EST**

**Presenter: Stephanie Carman**

*BLM's Greater Sage-Grouse Project Coordinator*

**WebEx Session ID: 649 130 474**

**Password: Sage1**

To join the WebEx session online click <http://bit.ly/sagegrousewebex> or paste the link directly into your internet browser and follow the instructions that appear on your screen.

To join the session by phone dial: (888) 391-6587,  
Passcode: 1472468.

For technical assistance, please contact: Andy Rojo at [arojo@blm.gov](mailto:arojo@blm.gov) or (602) 906-5542.



*Learn More About*

**BLM's Greater Sage-Grouse Planning Strategy**

IDMT\_0007539

**Brent Ralston**

---

**From:** Foss, Jeffery  
**Sent:** Thursday, April 23, 2015 1:39 PM  
**To:** Amy Lueders; Stephanie Carman; Melvin (Joe) Tague  
**Cc:** Steve Ellis; Timothy Murphy; Brent Ralston; Jonathan Beck; Donald Smurthwaite; Peter Ditton  
**Subject:** Fwd: State of Idaho Sage Grouse Plan  
**Attachments:** State of Idaho Sage Grouse Plan.pdf

FYI

I attended a presentation today by Idaho Dept. of Lands Director Tom Schutlz on Idaho's Sage grouse plan. Attached is a two page summary that was handed out.

Jeff

**Jeff Foss**  
**Acting State Director-Idaho BLM**  
**1387 S. Vinnell Way, Boise, ID 83709**  
**208-373-3800 or 373-4001**  
[jfoss@blm.gov](mailto:jfoss@blm.gov)

----- Forwarded message -----

From: **Mondor, Kathy** <[kmondor@blm.gov](mailto:kmondor@blm.gov)>  
Date: Thu, Apr 23, 2015 at 1:21 PM  
Subject: State of Idaho Sage Grouse Plan  
To: Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>

Per request

--

*Kathy J. Mondor*

**Executive Secretary**

*BLM Idaho State Office*

*1387 S. Vinnell Way*

*Boise, ID 83709*

*208-373-4001*

[kmondor@blm.gov](mailto:kmondor@blm.gov)

Warning: This email may contain Privacy Act Sensitive Data, which is intended for the use of the individual to which it is addressed. It may contain information that is privileged, confidential or otherwise protected under applicable laws.



## **IDL Greater Sage-grouse Conservation Plan**

### **Background and Key Elements of the Plan**

*Updated April 2015*

There are approximately 10.5 million acres of Core and Important (C/I) Sage-grouse habitat in Idaho. Approximately 620,000 acres of endowment rangeland are in identified C/I habitat, which makes up only about six percent of the total surface ownership within C/I habitat zones but accounts for 44 percent of all endowment rangeland ownership. Approximately 69,000 acres of IDL mineral ownership makes up 0.66 percent of the total mineral ownership within C/I habitat zones.

**The IDL plan focuses on the three primary threats to Sage-grouse for Idaho, as determined by the U.S. Fish & Wildlife Service.**

- Wildfire
- Infrastructure
- Invasive Species

**The IDL Plan outlines enforceable stipulations in leases, permits, and easements on endowment lands.**

**The conservation measures also will be used as best management practices for activities pertaining to IDL's role in supporting fire prevention, suppression, and rehabilitation, and regulating oil and gas development, some mining activities, and abandoned mine reclamation.**

**The IDL plan complements Governor Otter's sage grouse plan for federal land management in Idaho.**

- The Governor's plan was submitted to the U.S. Department of Interior Bureau of Land Management (BLM) in September 2012. The Governor's Plan was incorporated in the November 2013 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Management Plan Amendment and Environmental Impact Statement, where it was presented as a "co-preferred alternative."
- The USFWS will consider the Idaho plan, including the IDL plan nested within the broader state effort, and conservation measures outlined by ten other western states and regulatory mechanisms for federal lands in the states, before it makes a decision whether to list sage-grouse under the Endangered Species Act (ESA).

**Governor Otter backed up Idaho's commitment with a budget recommendation of \$750,000 for Sage-grouse conservation activities.**

- \$250,000 for IDL to implement cooperative fuel breaks on endowment rangelands and money to refurbish firefighting equipment for use by Idaho's rangeland fire protection associations

\$500,000 to Office of Species Conservation for spring lek surveys; funding for establishment of more rangeland fire protection associations; and private lands coordination efforts

FINAL IDL Greater Sage-Grouse Conservation Plan and other materials available at:  
<http://www.idl.idaho.gov/sage-grouse/index.html>

## Key Elements of the IDL Plan

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**Fuels Management** – IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to:

- Strategically **establish fuel breaks** to protect C/I habitat zones
- Use **targeted grazing** as a treatment to reduce vegetative fire fuels, reduce annual grass densities, and to protect and enhance C/I habitat zones
- Strategically **remove juniper** near habitat
- Utilize the BLM/U.S. Forest Service Fire and Invasives Assessment Team (FIAT) plans for identification and prioritization

### **Fire prevention**

- IDL will continue to support the formation and ongoing operations of **rangeland fire protection associations**
- Authorized lessees and permittees will be required to develop and be prepared to implement a **fire prevention and emergency response plan** that covers all aspects of operations

### **Wildfire Restoration and Rehabilitation**

IDL will form partnerships, agreements, and cooperate with lessees, working groups, and other federal, state, county, and private partners in **post-fire restoration treatments** of C/I habitat zones on lands damaged by fire.

### **Buffers**

**No surface occupancy** is allowed within 0.62 mile of lek in C/I habitat zones.

### **Marked fencing**

New and existing wire fence segments located in high risk areas will be **marked with collision-diverter markers**.

### **Operational restrictions**

- **Noise levels** from operational activities within C/I habitat zones will be limited during breeding season
- **Seasonal restrictions** apply to project activities within 0.62 mile of occupied leks

### **Land Exchanges**

IDL may recommend the Land Board consider a three-year deferral on leasing of endowment minerals if the Department of Interior adopts a streamlined exchange process that enables the State to enter into an expedited exchange process with the BLM to reduce endowment ownership of Key habitat within Core habitat zones and provide the greatest levels of certainty for conservation of Sage-grouse habitat.

## Brent Ralston

---

**From:** Jeffery Foss  
**Sent:** Thursday, April 16, 2015 10:09 AM  
**To:** Brent Ralston  
**Subject:** Re: Greater Sage-Grouse Conservation Plan/Revised Draft

No worries :)

Sent from my iPhone

On Apr 16, 2015, at 9:53 AM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Jeff,

Sorry to waste your time – I didn't see the link the first time – thanks for directing me.

Brent Ralston  
Special Projects Lead  
Jarbidge & Owyhee Grazing Permit Process  
208-373-3812

---

**From:** Jeffery Foss [mailto:[jfoss@blm.gov](mailto:jfoss@blm.gov)]  
**Sent:** Thursday, April 16, 2015 9:06 AM  
**To:** Brent Ralston  
**Subject:** Re: Greater Sage-Grouse Conservation Plan/Revised Draft

Try the link in this email string

Sent from my iPhone

On Apr 16, 2015, at 8:42 AM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Jeff,

Could you resend this with the attachment?

Thanks!

Brent Ralston  
Special Projects Lead  
Jarbidge & Owyhee Grazing Permit Process  
208-373-3812

---

**From:** Jeffery Foss [mailto:[jfoss@blm.gov](mailto:jfoss@blm.gov)]  
**Sent:** Thursday, April 16, 2015 5:15 AM  
**To:** Kurt R Wiedenmann; Peter Ditton; Brent Ralston; Jonathan Beck  
**Cc:** Anne Briggs  
**Subject:** Fwd: Greater Sage-Grouse Conservation Plan/Revised Draft

FYI

Sent from my iPhone

Begin forwarded message:

**From:** Tom Schultz <[tschultz@idl.idaho.gov](mailto:tschultz@idl.idaho.gov)>  
**Date:** April 15, 2015 at 5:02:07 PM MDT  
**To:** Timothy Murphy <[tmurphy@blm.gov](mailto:tmurphy@blm.gov)>, Jeffery Foss <[jfoss@blm.gov](mailto:jfoss@blm.gov)>, <[michael\\_carrier@fws.gov](mailto:michael_carrier@fws.gov)>, <[Noreen\\_Walsh@fws.gov](mailto:Noreen_Walsh@fws.gov)>  
**Cc:** <[mdudley@fs.fed.us](mailto:mdudley@fs.fed.us)>  
**Subject:** FW: Greater Sage-Grouse Conservation Plan/Revised Draft

I've attached the link that went out today with the latest version of our sage grouse plan for state and private lands. It will be going to the Land Board and the Oil & Gas Conservation Commission next week for approval consideration. I'll let you all know how it fares. Thanks for your help and support.

Respectfully,

Tom

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**From:** Sandra Allen  
**Sent:** Wednesday, April 15, 2015 3:41 PM  
**To:** 'Moore, Virgil'; Don Kemner; 'Tom Perry'; 'Dustin T. Miller'; '[joshua.uriarte@osc.idaho.gov](mailto:joshua.uriarte@osc.idaho.gov)'; '[john.chatburn@oer.idaho.gov](mailto:john.chatburn@oer.idaho.gov)'; Helmick, Darcy; '[rhendricks@idahofb.org](mailto:rhendricks@idahofb.org)'; Wyatt Prescott ([wyatt@idahocattle.org](mailto:wyatt@idahocattle.org)); Brett Dumas; Randy Vranes ([randy.k.vranes@monsanto.com](mailto:randy.k.vranes@monsanto.com)); Bill Myers; '[geneusmc@srvinet.com](mailto:geneusmc@srvinet.com)'; '[jrobison@idahoconservation.org](mailto:jrobison@idahoconservation.org)'; '[wwhelan@tnc.org](mailto:wwhelan@tnc.org)'; '[jackoylersfw@hotmail.com](mailto:jackoylersfw@hotmail.com)'; '[vdotcattleco@gmail.com](mailto:vdotcattleco@gmail.com)'; Jack Lyman ([ima@idahomining.org](mailto:ima@idahomining.org)); 'Suzi Budge'; Tom Schultz; Bob Brammer; Patrick Hodges; Pat Seymour; Julia Sullens; Mike Murphy; Brandon Lamb; Eric Wilson; Bobby Johnson; Diane L. French; Sid Anderson; Dave Schwarz; Julianne Shaw; Stephen Goodson  
**Cc:** Pat Seymour; Emily Callihan; Tom Schultz; Renee L. Miller; Bob Brammer; Patrick Hodges  
**Subject:** Greater Sage-Grouse Conservation Plan/Revised Draft

Dear Interested Party:

Thank you for your comments on the Idaho Department of Lands (IDL) draft Greater Sage-Grouse Conservation Plan (Plan). IDL values your contributions.

Since February 2013, IDL has engaged you and other stakeholders for comments on the draft Plan. The comments IDL received informed revisions to the Plan, and the revised Plan is now posted at <http://www.idl.idaho.gov/sage-grouse/index.html>.

The revised Plan will be presented for approval to the State Board of Land Commissioners on April 21, 2015, and the Idaho Oil and Gas Conservation Commission on April 23, 2015.

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*Greater Sage-grouse (GRSG) is a candidate species currently being reviewed by the US Fish and Wildlife Service to determine listing status under the Endangered Species Act (ESA). As a direct outcome of the proposed ESA listing review, the US Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the GRSG throughout their management zones within sage-grouse habitat. The State of Idaho engaged in similar efforts and Governor Otter submitted an Idaho Plan for sage-grouse conservation on federal land to be considered by the BLM in the EIS alternative analysis. IDL's Sage-grouse Management Plan is meant to complement the Governor's Idaho Alternative, but it addresses endowment trust lands and IDL regulatory programs on private land.*

**Sandra J. Allen *on behalf of Director Tom Schultz***

Administrative Assistant/Director's Office

Idaho Department of Lands

P.O. Box 83720

Boise, ID 83720

208-334-0244

[sallen@idl.idaho.gov](mailto:sallen@idl.idaho.gov)





**Idaho Department of Lands  
Greater Sage-Grouse Conservation Plan**

April 21, 2015



*Credit KTVB*

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## Executive Summary

Sage-grouse is a candidate species being reviewed by the U.S. Fish and Wildlife Service (USFWS) to determine listing status under the Endangered Species Act (ESA).

As part of Idaho's commitment to conserving sage-grouse, the Idaho Department of Lands (IDL) developed conservation measures (CMs) for endowment trust land (endowment lands) management programs and for programs that fall under some IDL regulatory and assistance functions. The CMs for IDL programs that involve sage-grouse habitat are included in the Proposed Greater Sage-Grouse Conservation Plan (Plan) outlined in this document.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits, and easements. For activities that take place on privately owned lands in sage-grouse habitat but involve some IDL regulatory and assistance functions, CMs are presented as voluntary best management practices.

Endowment lands are managed under a mandate in the Idaho Constitution (Article IX Section 8) to maximize long-term financial returns to public schools and other State of Idaho institutions. Approximately 1.4 million acres of the total 2.4 million acres of endowment land in Idaho are rangelands, and nearly half of these endowment rangelands are in Core and Important sage-grouse habitat zones identified by the Idaho Alternative, and as concurred by the USFWS.

The IDL also carries out a number of regulatory and assistance duties. The IDL regulatory and assistance responsibilities that affect sage-grouse habitat include regulating certain oil and gas development activities; dredge and placer mine permitting; mine reclamation plan approvals; and abandoned mine land reclamation. The IDL also supports enhanced fire preparedness and suppression in sage-grouse habitat.

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## 1. Brief History

In 2010, the USFWS determined Greater Sage-grouse (sage-grouse) warranted protection under the ESA, but it was precluded from listing due to higher priority species. In the USFWS decision, the primary threats listed for Idaho were: wildfire, invasive species, and infrastructure development.

The timeline for USFWS analysis was further accelerated when in 2011 a multidistrict litigation in the U.S. District Court of the District of Columbia resulted in a settlement agreement between the litigants and the USFWS. The settlement agreement required the USFWS to implement a six-year work plan to enable the agency to systematically review and address the needs of more than 250 species listed on the 2010 *Candidate Notice of Review* to determine if they should be added to the Federal Lists of Endangered and Threatened Wildlife and Plants. The USFWS agreed to determine the listing status of sage-grouse in 2015. Later in 2012, the U.S. District Court for the District of Idaho ruled that pursuant to the D.C. District Court settlement, the USFWS must reevaluate the status of sage-grouse under the ESA by September 30, 2015. In response to these deadlines, then-Secretary of the Interior Ken Salazar invited the 11 western states impacted by a potential listing of the species, including Idaho, to develop state-specific regulatory mechanisms to address the cited deficiencies in an effort to preclude a listing under the ESA.

As a direct outcome of the proposed ESA listing review, the U.S. Bureau of Land Management (BLM) initiated a draft Land Use Plan Amendment and Environmental Impact Statement (EIS) pertaining to the sage-grouse throughout BLM' management zones within sage-grouse habitat.

In March 2012, Governor C.L. "Butch" Otter issued Executive Order No. 2012-02 establishing the Governor's Sage-grouse Task Force. The task force's goal was ultimately to develop state-specific regulatory mechanisms for the BLM to incorporate the state's plan as an alternative in the BLM environmental analysis pursuant to the National Environmental Policy Act (NEPA) EIS. The *Idaho Alternative* was submitted to the BLM in September 2012. The *Idaho Alternative* was incorporated as Alternative E in the November 2013 BLM Draft Idaho and Southwest Montana Sub-Regional Sage-grouse Land Use Plan Amendment and EIS, where it was presented as a "co-preferred Alternative" along with the BLM Alternative D.

The IDL Plan complements the Governor's *Idaho Alternative* Sage-grouse Plan for federal land management in Idaho.

The Plan utilizes the *State of Idaho Habitat Zone* classifications defined in 2012 by the Governor's task force. Consistent with the *Idaho Alternative*, IDL focuses conservation efforts on the Core and Important habitat zones, which include the great majority of the sage-grouse populations in Idaho. There are more than 10,500,000 acres in Core and Important sage-grouse habitat zones in Idaho, with the vast majority of these acres under federal management (Table 1.1). IDL has surface or mineral ownership of almost 690,000 acres of Core and Important habitat, with about 619,000 acres of surface ownership in these habitat zones. While the IDL ownership is a relatively small proportion of the 10.5 million acres of habitat (less than 6 percent), almost half of endowment rangelands are found within the Core and Important habitat zones.

## 2. Purpose of the Plan

The Plan has a threefold purpose. (1) It summarizes CMs for endowment land programs and IDL regulatory and assistance programs that are complementary to the *Idaho Alternative* for sage-grouse conservation actions on federal land. (2) It communicates to the USFWS that, along with the *Idaho Alternative*, there are adequate existing regulatory mechanisms to alleviate the primary threats to sage-grouse and sage-grouse habitat in Idaho (such certainty will be necessary to prevent the sage-grouse from being listed under the ESA). (3) It preserves the statutory responsibility of IDL to manage endowment lands under a constitutional mandate to maximize long-term financial returns to state institutions, mainly public schools.

For proposed activities by third parties on endowment lands, IDL will implement sage-grouse CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements. In addition, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

IDL also will implement actions through its roles and responsibilities that support enhanced fire preparedness and suppression in sage-grouse habitats.

## 3. Coordination

Utilizing available funding, IDL will collaborate, coordinate, and utilize cooperative planning efforts to implement and monitor proposed CMs to protect and potentially improve sage-grouse habitat. Coordination efforts could include: adjacent landowners, federal and state agencies, local governments, tribes, communities, other agencies, resource advisory groups, lease/permit holders, and nongovernmental organizations.

Current sage-grouse coordination efforts in which IDL is involved include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015),*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project,*
- c. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015),*
- d. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014),*
- e. *Jarbidge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA),*
- f. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015), and*
- g. *Owyhee Land exchange (Agreement to Initiate signed December, 2008).*



In addition, IDL's FY 2016 budget includes a one-time appropriation of \$55,000 from the General Fund to cover IDL personnel costs within the Forest and Range Protection program for two heavy equipment mechanic positions to refurbish water tender equipment. This equipment will be utilized by the Rangeland Fire Protection Associations (RFPAs) in suppressing rangeland fire in the sage-grouse landscape. The FY 2016 budget also includes a one-time appropriation of \$195,000 in Dedicated Funds (Earnings Reserve) for operating expenses within the Lands and Waterways program for fire prevention fuel breaks, conifer encroachment treatments, post-fire seeding, fire prevention brush management, wildlife fencing, flagging, and water development wildlife escape ramps.

#### **4. Greater Sage-Grouse Management Areas**

The Plan utilizes the *State of Idaho Habitat Zone* classifications as described in the *Idaho Alternative, September 2012* and as proposed by the Governor's Sage-grouse Task Force. The *Idaho Alternative* designated a Sage-Grouse Management Area ("SGMA") with three distinct management zones: Core Habitat ("CHZ"), Important Habitat ("IHZ") and General Habitat ("GHZ"). At this time, IDL is not proposing any CMs for endowment lands or regulatory and assistance activities within the GHZ.

IDL concurs with and repeats the following statements from the *Idaho Alternative*:

*The State recognizes that any attempt to map sage-grouse habitat must, by necessity, be at a broad, programmatic scale. The mapping of boundaries presented above is not intended to equate to verified boundary locations or on-the-ground habitat types from which the public can determine with certainty whether any particular location is inside or outside of a particular management zone.*

*Rather, the mapping exercise is intended to give governmental entities, land managers, project proponents and the public a general idea of where certain types of habitat and conservation priorities are spatially located as of the date of the map. The State also recognizes that this mapping exercising depicting current habitat for the species is not static, and any map must be verified through site-specific environmental analysis.*

As described in the *Idaho Alternative*, additional lands beyond the identification thresholds have "been included in the CHZ to consolidate key breeding areas, to include wilderness areas and lands within national monuments, and to foster population connectivity with neighboring states." The IHZ similarly includes "areas of value for migration corridors, connectivity among breeding areas, and long-term persistence of each of the two key meta-populations of sage-grouse in Idaho." By default of the broad scale mapping exercise, both the CHZ and IHZ also include some areas that are neither sage-grouse habitat nor connectivity corridors.

The *Idaho Alternative* lists specific vegetation criteria to be considered for livestock grazing management on federal lands.

*Grazing within the CHZ and IHZ will be managed according to the process outlined in the text below. The first step, and perhaps the most important, is to inform and educate affected permittees regarding sage-grouse habitat needs and conservation measures. These habitat needs or characteristics outlined in Tables 3-5 will be incorporated into relevant resource management plans as the desired conditions with the understanding that these desired conditions may not be*

*achievable: (a) due to the existing ecological condition, ecological potential or the existing vegetation; or (b) due to casual events unrelated to existing livestock grazing.*

The IDL Range Management/Livestock Grazing measures do not include the vegetative criteria recommended for grazing on federal lands. The IDL livestock grazing component is from the previously vetted and approved 2006 Conservation Plan for the Greater Sage-grouse in Idaho (“2006 Idaho Plan”), and as detailed in Section 16 below.

The *Idaho Alternative* uses a *Core, Important, and General* habitat zone classification that is somewhat different from the BLM subregional alternative habitat classification of *Priority, Important, and General Habitat Management Areas* for Idaho. In addition to differences in habitat classifications there exist variations between on-the-ground habitat mapping in the Idaho Alternative and the BLM subregional Alternative. However, both Alternatives recognize the value of a three-tiered habitat approach which is essential to the functionality of the adaptive management process outlined in the Idaho Alternative. In 2014, the State of Idaho and the Idaho BLM came to final agreement of the sage-grouse habitat map for purposes of completion of the Final EIS for management actions on federal lands. The State and IDL both recognize the value of having a consistent classification across the sage-grouse landscape in Idaho, and IDL fully adopts the habitat map agreed upon by the State of Idaho and the Idaho BLM.

IDL will recognize any habitat management updates resulting from the five-year formal map review.

## **5. Adaptive Management**

### **5.a. Adaptive Management for Federal Lands**

The *Idaho Alternative* (September, 2012) Adaptive Management Triggers have been further refined and presented to the USFWS (Brian Kelly) in a letter from Governor Otter dated March 14, 2013. The trigger discussion has been copied from that letter, in part for reference:

*The adaptive triggers provide a regulatory backstop to prevent further loss and stabilize habitats and populations in the CHZ, and to a lesser extent in the IHZ, where a demonstrated significant loss has either occurred over time or unexpectedly (i.e., Murphy Complex Fire). These adaptive triggers are employed when dramatic shifts in population or habitat occurs based on an average over a three year period compared to 2011 values. Additionally, these adaptive triggers place the primary and secondary threats to the species in proper context to appropriately evaluate the cause(s) of the decline.*

*In addition to the below description, Idaho’s Alternative utilizes two types of triggers to help determine whether changes in management are necessary. The triggers are broken down into a “soft” trigger and a “hard” trigger. The “soft” trigger becomes operative when one of the following occurs:*

- *10% decline in maximum number of males counted and a finite rate of change below 1.0 but not significantly on CHZ over a period of three years; or*
- *10% loss of nesting and wintering habitat in the CHZ of a Conservation Area over a period of three years.*

*When the monitoring information indicates that the “soft trigger” may be tripped, an Implementation Team – aided by the technical expertise of IDF&G – will assess the factor(s) leading to the decline and identify potential management actions. See Idaho Alternative at 7. The Implementation Team<sup>1</sup> may consider possible changes in management to the CHZ. As to the IHZ, the Implementation Team may review the causes for decline and potential management changes only to the extent those factors significantly impair the state’s ability to meet the overall management objective. It is anticipated IDF&G will collect data annually and will make recommendations to the Implementation Team by August 31<sup>st</sup> for population triggers and January 15<sup>th</sup> for habitat triggers. (Per D. Kemner, IDFG, IDFG will collect population data and the BLM will collect habitat data)<sup>2</sup>.*

*The “hard” trigger becomes operative when one of the following occurs:*

- *20% loss in CHZ nesting and/or<sup>2</sup> wintering habitat over a period of three years; or*
- *20% decline in maximum number of males counted and a finite rate of change significantly below 1 within a CHZ of a<sup>2</sup> Conservation Area over a period of three years.*

*If the hard trigger becomes operative according to the monitoring information, management changes are no longer discretionary and will be implemented in the following manner:*

*First, the IHZ will be managed according to the CHZ provisions primarily impacting the ability to consider infrastructure projects. Like the “soft trigger,” the Implementation Team will analyze the actual cause(s) of the decline. The flow chart (Appendix II of letter is titled Adaptive Trigger Strategy- Determine What Caused a Hard Trigger to Become Operative and What Management Actions are Necessary) illustrates the process used to determine which threat(s) caused the habitat or population loss.*

*As the illustration denotes, the Service identified wildfire, invasive species, and infrastructure as the primary threats and West Nile Virus, improperly managed grazing, and recreation as secondary threats. This adaptive trigger strategy focuses the analysis on mitigating the primary threats to the*

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<sup>1</sup> Excerpted from the clarification letter sent to Steve Ellis, Idaho State Director, BLM from Dustin Miller, Administrator, Governor’s Office of Species Conservation dated July 1, 2013 :

*As part of the state’s responsibility under the MOU, Governor Otter would issue an Executive Order (under state law, an EO has the force and effect of law) establishing an Implementation Task Force to meet the state’s role and responsibilities under the MOU. This task force would be similar in composition to Governor Otter’s Sage-Grouse Task Force pursuant to Executive Order 2012-02.*

*The Implementation Task Force would be tasked with providing Governor Otter advice and counsel on at least the following issues: (1) analyzing the annual sage-grouse monitoring data to determine whether an adaptive response is appropriate and necessary given the population and habitat objectives provided in the Governor’s Alternative; (2) providing input during the National Environmental Policy Act (NEPA) process for on-the-ground infrastructure projects; and (3) prioritizing habitat restoration opportunities. The Implementation Task Force would submit these recommendations to the Governor, and based on his review and concurrence, will transmit these recommendation to the appropriate agency as part of the underlying NEPA analysis. The ultimate decision involving public land management would fall to the appropriate agency.*

*The Implementation Task Force will make recommendations based on the data and recommendations provided by a science subcommittee led by the Idaho Department of Fish and Game (IDFG). The Implementation Task Force may solicit outside experts if necessary.*

<sup>2</sup> Personal communication with Don Kemner, Idaho Fish and Game, April 11, 2015 correcting and clarifying items in letter that were refined for the DEIS.

species in the CHZ. Only where the monitoring information indicates the cause(s) of the decline is not a primary threat will the Implementation Team analyze the secondary threats to the species and determine whether further management actions are needed.

Population and habitat objectives are measured against baselines are illustrated in the tables below. The baseline for habitat within each CA is the 2011 nesting and wintering habitat for the CHZ and IHZ. (See Tables 1 and 2, *Idaho Alternative*, 2012.) The population baseline is the maximum number of males counted on lek routes in 2011 within the CHZ and the average finite rate of change of population for 2009-2011 within the CHZ. It is measured the same way in IHZ. CHZ and IHZ triggers are analyzed separately. The habitat triggers are also analyzed separately from the population triggers.

## **5.b. Adaptive Management for State Endowment Lands**

While IDL recognizes that the soft and hard triggers would become operative across the landscape in a conservation area, regardless of land ownership, the appropriate response to address a soft or hard trigger tripping will only take place on federal land according to the *Idaho Alternative*. However, if the Implementation Team determines the causal factors are applicable to IDL managed land, IDL commits to implementing CMs tailored to meet the identified causal factor. These would likely be implemented immediately under an emergency action clause pending IDL Director approval. However, any CM to be implemented long-term that is a major deviation from the IDL Sage-grouse Plan would need to be approved by the State Board of Land Commissioners (Land Board) as an amendment to the Plan.

IDL will also utilize monitoring results to make any recommendations to the Land Board for their consideration as amendments to the Plan.

## **6. Anthropogenic Disturbance**

Impacts caused by anthropogenic disturbances on sage-grouse can vary depending on the type of activity and local habitat conditions. In addition, cumulative impacts of multiple activities can have significant, negative impacts on sage-grouse populations. In the *Administrative Draft Proposed Plan*, the BLM utilizes a 3 percent disturbance limit across all landowners within eight Biologically Significant Unit areas. Because endowment lands make up such a small percentage of Core and Important habitat zones, IDL will not place a disturbance limit within any defined areas on endowment lands since these limits would result in a violation of the fiduciary trust responsibilities bestowed on the Land Board and IDL in managing endowment lands in accordance with the Constitutional mandate.

## **7. Mitigation**

At this time, the State of Idaho has not finalized a mitigation plan, nor have there been funding sources identified or allocated to implement such a mitigation plan. Idaho's proposed mitigation plan is described in the "Framework for Mitigation of Impacts from Infrastructure Projects on Sage-grouse and Their Habitats" (Sage-Grouse Mitigation Subcommittee of the Idaho Sage-Grouse Advisory Committee, December 2010).

IDL will commit to following Idaho’s mitigation plan once fully developed to the extent adequate funding exists.

## Plan Format

The Plan format uses two PARTS. PART I presents the CMs IDL will implement in its authorizing documents (e.g. leases) for third party activities on endowment lands. In addition, PART I identifies activities to be undertaken by IDL as the land manager related to fire prevention, wildfire suppression, and land transactions (e.g. land exchanges).

PART II presents the CMs IDL will recommend as voluntary best management practices for mining operators and oil and gas operators on non-state lands. In addition, PART II identifies activities to be undertaken by IDL under its statutory roles regarding fire prevention, wildfire suppression, and abandoned mine land reclamation.

Each Part then follows the numbered headings used in the BLM *Administrative Draft Proposed Plan* as an organizational outline and reader courtesy.

**TABLE 1.1 IDL Ownership within Sage-grouse Habitat by Conservation Area and Habitat Zones**

Conservation Area	Habitat Zone	Total Acres All Owners	Total IDL Ownership		IDL Surface Ownership		IDL Minerals Ownership Only	
		Acres	Acres	%	Acres	%	Acres	%
Idaho Desert	Core	1,017,180	31,702	3.12	29,853	2.93	1,849	0.18
	Important	1,064,653	43,510	4.09	38,710	3.64	4,800	0.45
	Total	2,081,833	75,212	3.61	68,563	3.29	6,649	0.32
Idaho Mountain Valleys	Core	2,110,685	177,006	8.39	164,286	7.78	12,720	0.60
	Important	1,602,894	135,004	8.42	120,881	7.54	14,124	0.88
	Total	3,713,578	312,010	8.40	285,166	7.68	26,844	0.72
Idaho Southern	Core	856,442	47,207	5.51	38,352	4.48	8,855	1.03
	Important	1,225,756	70,727	5.77	51,073	4.17	19,654	1.60
	Total	2,082,198	117,934	5.66	89,425	4.29	28,509	1.37
Idaho West Owyhee	Core	2,034,057	133,498	6.56	130,801	6.43	2,697	0.13
	Important	609,354	50,345	8.26	45,616	7.49	4,729	0.78
	Total	2,643,412	183,843	6.95	176,417	6.67	7,425	0.28
All Conservation Areas	CHZ and IHZ	10,521,022	688,999	6.55	619,571	5.89	69,428	0.66

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Exhibit 1  
Ownership by Sage Grouse Habitat Zone

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## **PART I. CONSERVATION MEASURES FOR ACTIVITIES ON STATE ENDOWMENT TRUST LANDS**

For proposed activities by third parties on endowment lands in Core and Important habitat zones, IDL will implement CMs as enforceable stipulations in authorizing documents such as leases, permits and easements. The authorized activities include: alternative energy development (solar, wind, and geothermal); oil and gas exploration and development; mining; grazing; miscellaneous commercial activities; and the granting of access through rights-of-way, including easements.

Also, IDL as the land manager will implement and support fire prevention and mitigation measures and wildfire suppression efforts to conserve sage-grouse habitat. In addition, IDL will include an analysis of sage-grouse habitat impacts when considering land transactions that are located in Core or Important habitat zones.

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one-size fits all” set of CMs. Science and technology also changes over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by applicants or lessees must provide equal or better results than the CMs described below. Site-specific management plans will be reviewed and approved by the appropriate IDL staff. When anticipated results are uncertain, IDL will confer with the Idaho Department of Fish and Game (IDFG) prior to approving any site-specific management plan.

### **8. Fire Prevention on Endowment Land**

IDL is committed to conserving habitat for the sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire preparedness and prevention measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

In Idaho, there are 619,571 acres of endowment lands located within Core (363,211 acres) and Important (256,280 acres) habitat zones. These lands contain about 82,000 Animal Unit Months (AUMs) of leased forage. As a primary threat wildland fire has the potential to significantly impact endowment rangelands located in Core and Important habitat zones. Between 2009 and 2014, more than 19,000 acres of Core and Important sage-grouse habitat burned on endowment rangelands due to wildland fire. Based on historical averages, approximately 3,200 acres of endowment rangelands are expected to burn each year within Core and Important habitat zones with significant impacts to grazing lessees and endowment beneficiaries.

During the 2014 fire season, 2,957 acres of Core Habitat Zone burned on endowment rangelands making 470 AUMs of livestock forage unavailable for one to two years. In 2014, Core habitat restoration costs on 2,088 acres of those endowment lands totaled nearly \$45,000. Left unaddressed, the primary threat of wildland fire within Core and Important habitat zones on endowment rangelands is expected to continue at the same rate.

The following CMs will be incorporated as stipulations for any authorizing documents, (except livestock grazing which is addressed separately under item 16 ), issued within Core and Important sage-grouse habitat:

**8.1.** Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

**8.2.** Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.

**8.3.** Authorized parties will ensure that field personnel are aware of:

- a. fire prevention and emergency response plan,
- b. evacuation routes and procedures,
- c. designated safety meeting places, and
- d. emergency shutdown procedures.

**8.4.** Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

## **9. Wildfire Suppression on Endowment Land**

Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations). Exhibit 2 displays the IDL, federal, and active and proposed rangeland fire protection association boundaries within the sage-grouse landscape.

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Exhibit 2  
Sage Grouse Habitat Zone and Fire Protection

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IDL is committed to conserving habitat for sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed wildfire suppression guidance that is complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important habitat zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasives Assessment Team (BLM/FS FIAT) plans. For extended attack fires involving endowment rangelands, in or near Core or Important habitat zones:

**9.1.** IDL may assign a Resource Advisor (primarily a Resource Specialist-Range) to provide local information regarding sage-grouse habitat during the in-brief and continually throughout the incident. The Resource Advisor will also be engaged with the incident to assess sage-grouse habitat that may be affected by the fire or suppression activities.

## **10. Fuels Management on Endowment Land**

Wildfires in a rangeland ecosystem can grow quickly and affect hundreds of thousands of acres of sage-grouse habitat in a matter of days or within a single burning period. Due to rapid fire spread, the potentially long response times due to remoteness, and limited sites for firefighters to establish safe anchor points to engage wildfires in some of these areas, these fires can be difficult to manage. Additionally, only one of the three legs of the fire triangle (fuel, oxygen, and heat) can be modified, which is fuel. This is why fuels management is key in wildfire control in sage-grouse habitat.

**10.1.** Unless otherwise specified as part of a land use plan, IDL will consider the full array of fuels management treatment types (prescribed fire, mechanical, chemical, and biological) when implementing CMs and BMPs on endowment rangelands.

**10.2.** Where applicable IDL will design fuels treatment objectives on endowment rangelands to protect existing Core and Important habitat zones, modify fire behavior, restore native plants, and create landscape patterns to benefit sage-grouse habitat, as resources permit and consistent with the BLM/FS FIAT plans .

**10.3.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to use proper livestock management and targeted grazing as a

treatment to reduce vegetative fire fuels, reduce annual grass densities, and to enhance and protect Core and Important habitat zones.

**10.4.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit. Examples of IDL cooperative efforts include:

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**10.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically implement brush management treatments and rehabilitate annual grasslands to reduce vegetative fire fuels within and to protect Core and Important habitat zones, as resources permit.

**10.6.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically establish green and brown strip fuel breaks along existing roads and other disturbances; identify and target higher-risk roads for fuel break construction and maintenance based on fire history maps; and use properly managed and targeted livestock grazing to create fuel break patterns that protect Core and Important habitat zones. Fuel breaks to include annual monitoring and maintenance. Examples of IDL cooperative efforts include:

- a. *Tri-State Interagency Fuel Break Project (Federal Register-NOI, 2015)*
- b. *Paradigm Fuel Break Project (BLM Draft EA, 01/24/2014)*
- c. *Jarbridge Fuel Breaks Project (DOI-BLM-ID-T010-2011-0006-EA)*

**10.7.** IDL will authorize private, state and federal contractor fuel break construction across IDL managed land.

**10.8.** IDL will prioritize fuel management treatments within Key Areas (large contiguous blocks of endowment land within Core and Important habitat that USFWS has identified as a priority for conservation efforts). Fuel management treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fuel management treatments within the Key Areas.

## **11. Wildfire Restoration and Rehabilitation on Endowment Land**

Wildfire restoration/rehabilitation is essential for conserving sage-grouse habitat. The increasing frequency and intensity of rangeland fire poses a significant threat to habitat as well as increasing opportunity for the accelerated invasion of non-native annual grasses, in particular cheatgrass and medusahead rye, and the spread of pinyon-juniper across the sagebrush-steppe ecosystem. By quickly taking action to restore/rehabilitate following wildfire, this opportunity is decreased as we increase the likelihood of desired vegetation reestablishing.

**11.1.** IDL will form partnerships, agreements, and cooperate with lessees, working groups, and other federal, state, county and private partners in post-fire restoration treatments of Core and Important habitat zones on state endowment trust rangelands damaged by fire. Restoration and rehabilitation efforts will be consistent with the BLM/FS FIAT plans.

- a. *BLM/IDFG/IDL Rangeland Rehabilitation MOU (Final MOU 02/2015)*

**11.2** IDL will prioritize fire restoration/rehabilitation treatments within Key. Fire restoration/rehabilitation treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any fire restoration/rehabilitation treatments within the Key Areas.

## **12. Habitat Restoration and Vegetation Management on Endowment Land**

**12.1.** As resources permit, IDL will give high priority to vegetation restoration, rehabilitation or manipulation projects in Core and Important habitat within the Key Areas first, followed by those areas not within the Key Areas, consistent with the BLM/FS FIAT plans that include:

- a. Cooperative efforts that may improve Core and Important habitat zones over multiple ownerships.
- b. Projects that may provide connectivity between suitable habitats or expand existing good quality habitat within Core and Important habitat zones on endowment rangelands.
- c. Sites where environmental variables contribute to improved chances for project success.
- d. Projects that address conifer encroachment within Core and Important habitat zones. Priority for treatment as Phase 1 (<10 percent conifer cover), Phase 2 (10-30 percent), and Phase 3 (>30 percent).
- e. Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial, or other techniques to re-establish desired species.
- f. Re-establish sagebrush cover on recently burned native areas within suitable Core and Important habitat zones, with consideration to endowment rangeland forage productivity, local needs and conditions.

**12.2.** Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.

**12.3.** Use available plant species based on their adaptation to the site when developing seed mixes.

**12.4.** Use post-treatment control to reduce annual grass densities, invasive and noxious weed competition through targeted livestock grazing and herbicide applications.

**12.5.** IDL will cooperate with lessees, working groups, and other federal, state, county and private partners to strategically remove standing and encroaching conifer near sage-grouse leks, nesting, wintering and brood-rearing habitat, as resources permit.

- a. *Bruneau-Owyhee Sage-Grouse Habitat Project (Federal Register- NOI, 01/20/2015)*
- b. *Burley Interagency Landscape Sage-Grouse Habitat Restoration Project*

**12.6** IDL will prioritize habitat restoration treatments within Key Areas. Habitat restoration treatments within Key Areas will incorporate sage-grouse seasonal habitat guidelines as presented in Tables 3-5 *Idaho Alternative* (developed from Connelly et al. 2000). When habitat parameters are uncertain or in doubt, IDL will confer with IDFG prior to conducting any habitat restoration treatments within the Key Areas.

### **13. Invasive Plant Species on Endowment Land**

Exotic annual grasses and other invasive plants alter habitat suitability for sage-grouse by reducing or eliminating native forbs and grasses essential for food and cover. Exotic annual grasses, in particular cheatgrass and medusahead rye, also facilitate an increase in mean fire frequency. For endowment lands, the following four CMs for invasive plant species will be applied through lease stipulations or other recordable instrument stipulations.

**13.1.** Vehicles and equipment operated by IDL or lessees that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.

**13.2.** Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by the lessee and the lessor or a designated agent.

**13.3.** Reclamation activities will include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) will be certified weed free by the appropriate federal or State of Idaho agency.

**13.4.** Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.



## 14. Infrastructure Development/ Lands and Realty on Endowment Land

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.*

*Infrastructure related to small –scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Infrastructure development on endowment lands can vary from minor road or fencing construction to utility-scale renewable energy facilities including wind farms, geothermal power plants, and solar power plants. These developments regardless of their size can have a measurable and substantial impact on sage-grouse and their habitat. All infrastructure developments require some form of road construction to deliver materials for construction and perform regular maintenance to facilities. These roads are often graded gravel roads and are maintained periodically for easy access to sites. Other smaller roads are developed for access to geothermal well pads, wind turbines, or pipelines. Roads may also be necessary for third-party access to private or federal lands.

Transmission lines must be built in order to harness power from wind turbines, geothermal sites, or solar sites and to provide for grid reliability. Additionally, fences are often erected to protect facilities such as turbines or substations from vandalism. These features all have the potential to directly, or indirectly, affect sage-grouse at multiple scales and over time.

IDL’s assessment of the potential for renewable energy development to occur on endowment lands located in Core and Important sage-grouse habitat zones is very low. However, any proposed development will be required to comply with the CMs identified in the following sections. These same CMs will also be included as stipulations in rights-of-way, when IDL authorizes parties to access other lands by using endowment lands.

### 14.1. Surface Use and Timing

**14.1.1.** Controlled surface use and timing limitations as described below will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the IDFG recommends otherwise.

**14.1.2.** No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones. Livestock grazing is not considered surface occupancy.

**14.1.3.** During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and

9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.

**14.1.4.** Major construction and maintenance activity shall be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

## **14.2. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

## **14.3. Fencing**

Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.

**14.3.1.** New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

**14.3.2.** As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

## **14.4. Water Supply Structures**

**14.4.1.** New or modified spring developments (including pipelines) shall be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.

**14.4.2.** As an exception to 14.4.4.1., on projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the lessee to treat these tanks for mosquito species that carry West Nile Virus.

**14.4.3** The construction of new ponds or reservoirs by authorized parties will be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse.

**14.4.4.** Wildlife escape ramps in new and existing water troughs and open-water storage tanks shall be developed to facilitate the use of and escape by wildlife.

## **14.5. Constructed Improvements**

**14.5.1.** Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.

**14.5.2.** Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations

**14.5.3.** Surface disturbances will be clustered in order to limit surface occupancy.

**14.5.4.** New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.

**14.5.5.** Use best available science in concurrence with IDFG to address concerns of transmission towers as perches for predatory or corvid birds.

**14.5.6.** New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.

**14.5.7.** Construction plans developed by authorized parties will include options that deter raptor perching and raven nesting on elevated structures.

**14.5.8.** Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

## **14.6. Site Reclamation** (non-fire related rehabilitation/reclamation)

**14.6.1.** Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.

**14.6.2.** Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.

**14.6.3.** Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **Transition Lands/Land Tenure**

IDL considers opportunities to sell, purchase, develop, or exchange endowment lands to meet its constitutional mandate to maximize long term returns to the owning beneficiaries by diversifying land holdings, maximizing the rate of return to the trusts, improving public access to endowment lands, and consolidating endowment lands for more efficient management. In order to accomplish these objectives, IDL must be able to maintain the flexibility to move lands into and out of the identified habitat zones. Lands identified for potential ownership changes are termed “transition lands.”

The ultimate decision authority for determining to auction or exchange endowment lands lies with the Land Board. IDL commits to providing the Land Board relevant data and analysis to inform them on potential impacts to sage-grouse habitat of land transitions within Core or Important sage-grouse habitat zones through the following CMs.

**14.7.** Any tract proposed for sale or exchange within Core or Important habitat zones will include an analysis on the impact to sage-grouse habitat resulting from the transition. This analysis will include, but not limited to:

- Acres in and percentages of Core and Important habitat zones.
- Quality/type of habitat (number of leks, breeding, nesting, early brood rearing, summer/late brood rearing, fall, winter).
- Any knowledge of new owner’s implementation/commitment for sage-grouse conservation measures to estimate overall impact to sage-grouse habitat conservation.
- IDFG data and review comments.

## **14.8 BLM Land Exchanges**

IDL adopts a general strategy aimed at reducing endowment ownership of Key Habitat within Core Habitat Zones through completion of land exchanges with the BLM. This strategy would provide the greatest levels of certainty for conservation of core sage-grouse habitat.

Once endowment lands have been proposed to be included in a formal land exchange with the submission and acceptance of an Agreement to Initiate (ATI) with the BLM, the IDL, with Land Board concurrence, would commit to up to a three-year deferral on leasing of those lands for mineral development in order to accomplish the exchange.

Key habitat areas within Core Habitat Zones within the endowment trust estate ~~are~~would be prioritized for exchange. In exchange for those endowment lands, IDL would prioritize BLM lands and/or minerals with the following characteristics for acquisition consistent with its duty to maximize revenue over the long term in accordance with Article IX, Section 8 of the Idaho Constitution: 1) lands and minerals located outside of Core and Important habitat zones, 2) lands with oil and gas resource development potential, 3) lands with non-native vegetation (previously seeded crested wheatgrass), and 4) lands that block up existing IDL ownership, not necessarily limited to the current disposal lists in the respective Resource Management Plans.

Given the long timeframes that can be associated with federal land exchanges, the IDL proposes that the Department of Interior consider adopting a streamlined exchange process, similar to authorities contained in the 2014 Farm Bill for the U.S. Department of Agriculture. Land exchanges that provide a net benefit to conservation of core sage grouse habitat, should be considered for a categorical exclusion under NEPA.

#### **14.9. Owyhee Land Exchange**

In December, 2008 the BLM and IDL entered into an Agreement to Initiate Land Exchange. IDL's objectives for parcel acquisition selection include: improved range (crested wheatgrass seedings), parcels outside core or important Greater Sage-Grouse habitat or Bighorn Sheep habitat, parcels that block up current IDL ownership and/or provide legal access to existing ownership, and parcels that may have Higher and Better Use (HBU) potential. Objectives for disposition of IDL lands include: wholly within or adjacent to designated wilderness, scattered parcels with no legal access and no management control, other scattered IDL parcels within large blocks of BLM ownership. Acreage in the current version of the of the exchange includes approximately 28,000 acres of IDL ownership and 32,000 acres of BLM ownership. Parcels in the exchange are displayed in Appendix D.

**14.10** New acquisitions of endowment lands within the Core and Important habitat zones would be discouraged; however, if minor amounts of lands were acquired, they would be managed according to the IDL sage-grouse CMs.

### **15. Mineral Leasing on Endowment Land**

For all mineral leasing activities on endowment lands, CMs for the sage-grouse will be applied through lease stipulations or other recordable instrument stipulations that are enforceable. Mineral leasing can be slightly more complex due to the potential for split estate scenarios, where the surface owner is different than the mineral estate owner. In these cases, IDL would still

include CMs as lease stipulations when leasing involves only the mineral estate (where the endowed beneficiary is not the surface owner).

### **15.1. Fluid Mineral Leasing on Endowment Land**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas. Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse habitat zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist. For endowment lands, the following oil and gas lease stipulations will be included in the lease document and advertised prior to lease auction on tracts within Core and Important habitat zones.

#### **15.1.1. Surface Use and Timing**

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **15.1.2. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season.

Ambient noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **15.1.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

### **15.1.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks will be developed to facilitate the use of and escape by wildlife.

### **15.1.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances will be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of transmission towers as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- h. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

### 15.1.6. Site Reclamation for Leases

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## 15.2. Mining Activities on Endowment Lands

Mineral leasing and any subsequent mining activities on state endowment trust lands require authorization and oversight by IDL. IDL uses written procedures, including mineral lease pre-auction inspections, quarterly or yearly mineral lease inspections, and mineral lease enforcement to ensure compliance by authorized parties. The following conservation measures will be incorporated into the IDL mineral leases that are in Core and Important sage-grouse habitat zones.

### 15.2.1. Surface Use and Timing

- a. Controlled surface use and timing limitations as described below will be applied within Core and Important habitat zones, unless species occupancy and distribution determined by the Idaho Department of Fish and Game (IDFG) recommends otherwise.
- b. No surface occupancy is allowed within 1 km (0.62 mi.) of an occupied lek in the designated Core and Important habitat zones.
- c. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations, project activities will be avoided within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000 foot elevation may be used as a general distinction.
- d. Major construction and maintenance activity will be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

### 15.2.2. Noise

Limit noise levels from discretionary activities within Core and Important habitat zones to not less than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from 2 hours before sunset to 2 hours after sunrise during breeding season. Ambient



noise levels will be determined by measurements taken at the perimeter of an occupied lek at sunrise.

### **15.2.3. Fencing**

New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.

### **15.2.4. Water Supply Structures**

Wildlife escape ramps in new and existing open-water storage tanks will be developed to facilitate the use of and escape by wildlife.

### **15.2.5. Constructed Improvements**

- a. Construction methods will be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- b. Infrastructure will be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, will be located along roads already in existence or required to be newly constructed for access to facilities.
- c. Surface disturbances may be clustered in order to limit surface occupancy.
- d. New utility developments and transportation routes will be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- e. Use best available science in concurrence with IDFG to address concerns of transmission towers as perches for predatory or corvid birds.
- f. New structures with a height over five feet will not be constructed by authorized parties within 1km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within 3 km of breeding period habitats. If these structures must be built, or presently exist, the lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- g. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- h. Permanent structures that create movement will be minimized within Core and Important Habitat Zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**15.2.6. Site Reclamation for Leases**

- a. Site reclamation will be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- b. Reclamation activities and plans will consider the ecological site potential. The goal of the reclamation will be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- c. Sites will be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

**16. Range Management/Livestock Grazing on Endowment Land**

IDL recognizes that healthy rangelands provide a basic foundation for productive sage-grouse habitat. Conservation and improvement of sage-grouse habitat is consistent with long-term grazing management systems that support conditions or trends toward healthy rangelands. Within the 2006 Conservation Plan for the Greater Sage-grouse in Idaho (“2006 Idaho Plan”), IDL agreed to take measures that protect or improve important and critical wildlife habitat, subject to the fundamental mission of IDL to support endowment beneficiaries. Though the impact of livestock grazing to rangelands is recognized as a secondary threat to sage-grouse habitat in Idaho, roughly 619,571 surface acres or 44 percent of endowment rangelands are within Core and Important habitat zones. IDL identifies proper livestock grazing as a tool that could benefit sage-grouse habitats by taking into consideration flexibility and site-specific management opportunities.

Identified within the 2006 Idaho Plan, livestock management practices are not stand-alone actions. Management activities should be considered in combinations best characterized by a complete and effective grazing program and that also considers key sage-grouse conservation needs. IDL further recognizes that opportunities exist for state and federal agencies, grazing lessees and university researchers to collaborate on efforts to modify current conditions and needed management actions in terms of livestock grazing in sage-grouse habitats throughout southern Idaho. IDL will administer endowment rangelands and livestock grazing leases in core and important habitat zones with lease stipulations that are drawn from, in part, the CMs specified within the 2006 Idaho Plan as well as more recent IDFG recommendations.

Issue Addressed	Conservation Measure(s)
Livestock management and leks.	1. Use lek route or other relevant information to identify leks where the placement of sheep camps, bed grounds, herding or related activities is repeatedly disturbing displaying birds on active leks. Dates of concern are from March 15 through May 1 in lower elevation with habitats and March 25 through May 15 in higher elevation habitats. Once such leks are identified, IDL will work closely with sheep ranchers, Local Working Groups and/or IDFG to identify mutually agreed upon alternative sites or herding routes that eliminate or reduce disturbance. In selecting such

Issue Addressed	Conservation Measure(s)
	<p>alternative sites/routes, focus on areas away from leks and that do not provide breeding habitat characteristics, where feasible. If such lek-specific CMs cannot be developed (due to time or logistical constraints), domestic sheep grazing activities described above will be avoided within the lesser of 1 km (0.62 mi) or direct line of sight of any such lek during the lekking periods.</p> <ol style="list-style-type: none"> <li>2. IDL will provide maps to lessees to ensure that sheep operators and herders are aware of the location of possible or occupied leks.</li> </ol>
Livestock management and late brood rearing habitat.	<ol style="list-style-type: none"> <li>1. Due to the preference of forbs by domestic sheep, manage sheep allotments using grazing management techniques that promote and maintain a diversity of desirable annual and perennial forbs. Suggestions include: <ol style="list-style-type: none"> <li>A. Alternate or rotate areas for spring turnout.</li> <li>B. Promote light, once-over use of vegetation, as opposed to repeated use during the same season by the same band or successive bands of sheep.</li> <li>C. Ensure that permittees, foremen, herders and sheep camp tenders are informed of management and movement requirements, such as related to the avoidance of recent burns, burned area rehabilitation seedings or other restoration sites.</li> <li>D. Employ open (loose) herding of sheep as opposed to tightly bunched sheep.</li> </ol> </li> <li>2. Manage grazing of riparian areas, meadows, springs, and seeps in a manner that promotes vegetation structure and composition appropriate to the site. In some cases enclosure fencing may be a viable option. However, in some cases, (e.g., enclosed meadows) the availability and quality of herbaceous species may be improved by periodic grazing use of enclosure and should be considered in the grazing management program.</li> <li>3. In agricultural fields where sage-grouse use has been documented or is likely, willing lessees may wish to avoid or limit use of alfalfa by livestock after the last cutting, to provide residual alfalfa for use by sage-grouse broods.</li> </ol>
Livestock management during periods of drought.	<ol style="list-style-type: none"> <li>1. In sage-grouse nesting and brood-rearing habitats, adjust livestock use (season, utilization, stocking, intensity, and/or duration) during drought to minimize the additional stress placed on herbaceous species. This is anticipated to reduce impacts on perennial herbaceous cover, plant species diversity and plant vigor. IDL will cooperate with lessees and federal partners as needed.</li> <li>2. IDL will continue to foster the coordination of drought management activities and outreach through the Idaho</li> </ol>

Issue Addressed	Conservation Measure(s)
Placement of salt and mineral supplements.	<p>Rangeland Drought Task Force committee.</p> <ol style="list-style-type: none"> <li>1. When using salt or mineral supplements: a) place them in existing disturbed sites, areas with reduced sagebrush cover, seedings, or cheatgrass sites (for example) to reduce impacts to sage-grouse breeding habitat, b) where feasible, use salts or mineral supplements to improve management of livestock for the benefit of sage-grouse habitat.</li> </ol>
Placement of fences and other structures.	<ol style="list-style-type: none"> <li>1. Findings from Stevens et al. 2012 show that sage-grouse collisions are highly variable spatially, and targeting efforts for fence marking is more strategic and cost-effective. Analysis revealed that terrain ruggedness and distance from the lek were primary factors associated with fence collision risk across the landscape. Use Natural Resource Conservation Service (NRCS) fence collision data and local knowledge to determine low, medium or high risk level around occupied leks. Fence segments within Key Areas will be the first priority.</li> <li>2. New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.</li> <li>3. Where feasible, IDL will recommend placement of new fences and structures with consideration of their impact on sage-grouse. In general, avoid constructing new fences within 1 km (0.62 mi) of occupied leks (adopted from Connelly et al. 2000b). Where feasible, place new, taller structures such as corrals, loading facilities, water storage tanks, windmills etc., as far as possible from occupied leks to reduce opportunities for perching raptors. Careful consideration, based on local conditions, will also be given to the placement of new fences or structures near other important seasonal habitats (winter-use areas, movement corridors etc.). In order to reduce potential impacts, fence markers will be used to mitigate mortality within areas identified by IDL, lessees or cooperative partners.</li> </ol>
Design and placement of water developments.	<ol style="list-style-type: none"> <li>1. IDL and lessees will cooperate on site-specific new spring developments in sage-grouse habitat. Spring developments will be designed to maintain or enhance the free-flowing characteristics of springs and wet meadows by the use of float valves on troughs or other features where feasible. Retrofit existing water developments during normal maintenance activities to maintain or enhance lentic, riparian properties and</li> </ol>

Issue Addressed	Conservation Measure(s)
	<p>minimize annual maintenance.</p> <p>2. IDL and lessees will cooperate to ensure that new and existing livestock troughs and open water storage tanks are fitted with wildlife escape ramps/ladders to facilitate the use of and escape from troughs by sage-grouse and other wildlife. Floating boards or similar objects will not be used as these are too unstable and are ineffective. IDL and lessees will cooperate to ensure that USDA-NRCS design requirements for wildlife escape ramps are followed when installed.</p>

## 17. Wild Horses and Burros

No direct measures, this item included to maintain sequential numbering system utilized for the BLM *Administrative Draft Proposed Plan*.

## 18. Travel Management

18.1. On site traffic should be reduced by use of telemetry and other remote sensing tools.

18.2. During operations, existing roads or trails should be employed and activities should be contained as close to existing roads and trails as feasible.

18.3. Roads should be designed by authorized parties to an appropriate minimum standard necessary to accommodate their intended purpose.

18.4. Road crossings should be constructed by authorized parties at right angles to ephemeral drainages and stream crossings.

## 19. Recreation

Recreation has been determined to not be a primary threat to sage-grouse in Idaho, but the measures listed above in 13. and 14. will also apply to recreation leases.

## 20. Implementation and Monitoring

Implementation of the CMs through lease/permit/easement stipulation will be incorporated into existing lease/permit/easement issuance procedures. A copy of the applicable CMs will be provided to all interested applicants for a lease, permit or easement on endowment lands located in Core or Important habitat zones, so the applicant is informed of the expected requirements when entering the application process. The CMs will be incorporated into the authorizing

document either directly or by separate addendum. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs required through lease/permit/easement stipulation will be incorporated into existing lease/permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for land transactions will be amended to include an analysis of the impacts on sage-grouse when the transaction includes transition lands within Core or Important habitat zones. The results of this analysis will be included in the information provided to the Land Board for their review of the proposed transaction.

## **PART II. CONSERVATION MEASURES FOR IDL ACTIVITIES IN THE FIRE PROGRAM AND FOR REGULATED ACTIVITIES IN THE OIL & GAS AND MINERALS PROGRAMS**

For regulatory and assistance activities on private land, CMs will be voluntary BMPs because IDL does not have the statutory authority within its regulatory programs or assistance activities to require adoption by authorized parties. Regulatory and assistance activities include: abandoned mine lands projects; dredge and placer mine permitting; mine reclamation plan approvals; and oil and gas permits (e.g. seismic imaging surveys, well drilling). Where appropriate, IDL will include recommended BMPs within its authorizing documents to encourage compliance.

In addition, IDL has roles and responsibilities in its fire program where CMs will be implemented to address conservation of sage-grouse habitat in Core and Important habitat zones.

### **8. Wildfire Preparedness/Prevention**

IDL is committed to conserving habitat for the greater sage-grouse in Idaho, which is under threat from the invasion of annual grasses and the loss of habitat from fire. IDL has developed the following wildfire preparedness and prevention conservation measures that are complementary with the January 5, 2015 U.S. Department of Interior, Secretary of Interior Order Number 3336. The Order from Secretary Jewell sets forth enhanced policies and strategies for preventing and suppressing rangeland fire and for restoring sagebrush landscapes impacted by fire across the West.

**8.1.** IDL will continue to support the ongoing operations of taxing and non-taxing fire districts in Idaho, when requested and as available, through equipment acquired through the Federal Excess Personal Property (FEPP) program and Firefighter Property (FFP) program, and through Volunteer Fire Assistance (VFA) grant fund allocations.

**8.2.** IDL will continue to support the formation and ongoing operations of Rangeland Fire Protection Associations (RFPAs) through the South Idaho Fire Liaison Program. This position is the point of contact for any needs or issues raised by RFPAs and their cooperators. The position coordinates information needs on an annual cycle as well as facilitating an annual meeting for all RFPA Board of Directors and their cooperators, held following fire season.

**8.3.** IDL will continue to support, as funding is available, the formation and operation of RFPAs through start-up funding that provides personal protective equipment, radios, firefighting equipment, and training materials.

**8.4.** IDL will continue to utilize burning permits (per Idaho Code 38-115, Rule IDAPA 20.04.01.060) during the designated closed fire season as a fire prevention and control tool. Burning permits acquaint the permit holder with the laws and requirements for safe burning. During times of critical fire hazard, all burning may be stopped by the suspension

of burning permits. Closed fire season provides for public safety and the protection of land resources by ensuring that all burning operations which may occur during periods of high fire danger are conducted under safe conditions and in such manner that the danger of uncontrolled fire spread is minimized.

**8.5.** IDL will continue to participate in the Idaho Fire Restrictions Plan (per Idaho Code 38-115, Rule IDAPA 20.04.01.060; IDAPA 20.04.01.070; IDAPA 20.04.01.090; and IDAPA 20.04.01.120), which is an interagency document that outlines coordination efforts regarding fire restrictions and closures. The purpose of fire restrictions is to reduce the risk of human-caused fires during unusually high fire danger and/or burning conditions. An interagency approach for initiating restrictions or closures helps provide consistency among the land management partners, while defining the restriction boundaries so they are easily distinguishable to the public.

## **9. Wildfire Suppression**

Appendix C outlines how wildfire protection responsibilities are organized in Idaho, and how Idaho funds its fire program, particularly suppression costs for fires that burn on lands protected by the State of Idaho (IDL and two timber protective associations).

None of the IDL forest protective districts have suppression responsibilities within any currently identified Core or Important habitat zones. Likewise, as of December 2014, none of the IDL forest protective districts have suppression responsibilities within any currently identified General habitat zone.

When IDL fire suppression resources are dispatched as a cooperating agency to another agency's incident within sage-grouse habitat, the resources will utilize that agency's BMPs as applicable for sage-grouse habitat and as instructed in the dispatched resource's briefing. Interagency cooperation suppression activities are assumed to follow the prioritization associated with the BLM/U.S. Forest Service Fire and Invasives Assessment Team (BLM/FS FIAT) plans.

## **10. Fuels Management**

IDL does not have general regulatory authority over fuels management on non-state rangelands.

## **11. Wildfire Restoration and Rehabilitation**

IDL does not have general regulatory authority over wildfire restoration and rehabilitation on non-state rangelands.



## **12. Habitat Restoration and Vegetation Management**

IDL has limited authority to regulate habitat restoration and vegetation management, but will address vegetation management through voluntary BMPs and permit stipulations. See section 15.

## **13. Invasive Plant Species**

IDL has limited authority to regulate invasive species, but will address invasive species management through voluntary BMPs and permit stipulations. See Section 15.

## **14. Infrastructure Development**

The *Idaho Alternative* defines “infrastructure”:

*... as discrete, large-scale anthropogenic features, including highways, high voltage transmission lines, commercial wind projects, energy development (e.g., oil and gas development, geothermal wells, airports, mines, cell phone towers, landfills, residential and commercial subdivisions, etc.*

*Infrastructure related to small –scale ranch, home and farm businesses (e.g., stock ponds, fences, range improvements) do not fall within this definition. These issues are not included within this definition, and are addressed in other sections of the Alternative or through local resource management plans.*

Because of the diversity of terrain and vegetation types within the sage-grouse region of Idaho, it is difficult to design a “one-size fits all” set of CMs. Science and technology also change over time, and new options or alternatives may be proposed as part of a site-specific management plan. Site-specific management plans submitted by authorized parties should provide equal or better results than the CMs described below. Site specific management plans will be reviewed by appropriate IDL staff and the IDFG prior to a final recommendation from IDL.

IDL has limited authority to regulate infrastructure development, but will address infrastructure development through voluntary BMPs and permit stipulations. See Section 15.

## **15. Minerals**

### **15.1. Fluid Minerals**

Fluid minerals are resources of oil, natural gas (gas), and natural gas condensate. The first commercially-viable resources of gas were discovered in Payette County in 2010. Exploration activity is also located in adjacent counties to Payette County. Recent leasing in south central and southeast Idaho suggests exploration interests in these areas.

Additional resource discoveries are possible in all of these areas. Presently, IDL has no exploration activities to regulate for fluid minerals located in Core or Important sage-grouse habitat zones.

The resources in Payette County were discovered with conventional drilling operations, which utilized vertical well bores that penetrated permeable gas accumulations within site-specific gas traps. These types of deposits are termed conventional gas (or oil) resources. In contrast, unconventional resources are continuously-distributed oil or gas accumulations in fine-grained rocks, which generally cannot be exploited through conventional methods and techniques. Unconventional resources have not been identified in Idaho, but the potential for their discovery does exist.

### **15.1.2. Oil and Gas Activities – Regulatory Compliance**

The IDL is the administrative arm of the Idaho Oil and Gas Conservation Commission (Commission) pursuant to § 47-319(2) which states that the commission is authorized to; "...regulate the exploration for and production of oil and gas, prevent waste of oil and gas and to protect correlative rights, and otherwise to administer and enforce this act. It has jurisdiction over all persons and property necessary for such purposes. In the event of a conflict, the duty to prevent waste is paramount." Under this authority, § 47-321 provides for the commission to establish spacing units which are legally described boundaries overlaying the resource and set a fixed acreage per well, with the well located in the center of the boundary. § 47-321(b) states that these spacing units are established by the Commission in order to; "...result in the efficient and economical development of the pool as a whole..."

At this time for conventional drilling techniques, the default spacing, set by the Commission, is 640 acres for gas and 40 acres for oil. As surface use restrictions grow, the Commission could see requests to modify the default spacing unit in order to limit surface disturbance. As the Commission receives these requests, IDL will provide sage-grouse habitat data so that the Commission, if it chooses, can incorporate such information into its decision establishing a new spacing unit.

The BMPs listed below will be provided to all applicants seeking permit issuance for operations in Core or Important sage-grouse habitat zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a stipulation in the permit.

#### **15.1.2.1. Oil and Gas Activities**

The following BMPs will be provided to all operators making application to drill a well, treat a well, or conduct seismic explorations in Core or Important habitat zones.

##### **a. Wildfire Prevention**

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with

local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.

- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. All vehicles and equipment that should travel off approved/designated transportation routes or will be utilized during operations will be cleaned before entry to prevent the spread of seeds and propagules. The equipment will also be cleaned at the conclusion of all field activities.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate Federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant

species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

**c. Surface Use and Timing**

- i. Conventional well activity and exploration will not be conducted within 0.62 miles of an occupied lek.
- ii. All pipelines and collector lines will be emplaced utilizing horizontal boring methods with a minimum setback of 0.62 miles of an occupied lek.
- iii. Construction of pipelines will be in accordance with seasonal stipulations regarding no operations or construction from March to July.
- iv. Planned pipeline maintenance will not be conducted between 6 p.m. to 8 a.m., except in an emergency situation, within 0.62 miles of an occupied lek during the breeding season.
- v. Compressor stations and other vital operations shall be placed a minimum of 0.62 miles from an occupied lek, unless screening or other mitigation is determined to be as protective.

**d. Noise**

- i. Noise from permitted well sites will not exceed a 65db daily average threshold during the lekking season, within 0.62 miles of an occupied lek.
- ii. Noise levels may be exceeded for emergency situations including well control, threats to freshwater resources, and other environmental safety concerns.

**e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland

areas facilitates management objectives for Core and Important habitat zones.

**f. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built, or presently exist, the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- viii. Permanent structures that create movement will be minimized within Core and Important habitat zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

**g. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.

- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

## **15.2. Abandoned Mine Lands Program**

The Abandoned Mine Lands Program operates on private, federal, and state lands. IDL works with landowners to address safety closures of dangerous mine openings and reclaim areas to protect human health. Reclamation is also performed to improve water quality and wildlife habitat, but public safety projects take precedence. IDL develops and controls these projects, and can incorporate sage-grouse CMs into the projects. Abandoned mine land projects will implement the following BMPs within Core and Important sage-grouse habitat zones.

### **a. Wildfire Prevention**

- i. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- ii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.
- iii. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

### **b. Invasive Species**

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.

- ii. Weeds should be inventoried and monitored pre-disturbance by IDL, and throughout the life of the project.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

#### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important habitat zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **d. Noise**

Limit noise levels from discretionary activities within Core and Important habitat zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.

#### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks will be allowed to conserve water resources and efforts will be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.
- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be developed to facilitate the use of and escape by wildlife.

#### **g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located



along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations.

- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- vi. New structures with a height over five feet will not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- viii. Permanent structures that create movement will be minimized within Core and Important habitat zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

### 15.3. Mining Regulatory Program

The Mining Regulatory program operates on private, federal, and state lands and covers all dredge and placer mining and surface mining operations. Activities classified as exploration, such as drilling or trenching, only require a notification to IDL. Dredge and placer mining operations over ½ acre require a permit and bond. Surface mining operations that produce materials for immediate or ultimate sale require a reclamation plan and bond. Coordinated reviews with Idaho Department of Environmental Quality, Idaho Department of Water Resources, and IDFG are required for operations that may impact water quality.

The BMPs listed below will be provided to all applicants seeking reclamation plan approval or permit issuance for mining operations in Core or Important sage-grouse habitat zones. If they agree to voluntarily comply with some or all of the practices, those practices will be incorporated as a condition of reclamation plan or permit approval.

To further contribute to conservation of sage-grouse habitat, IDL will also coordinate with IDFG to evaluate existing mines and their potential impact on sage-grouse habitat. The following best management practices will be suggested to these mine operators. IDL will also work with IDFG to develop an informational brochure for new mine operators so they may consider adopting these BMPs into their proposed operations.

#### a. Wildfire Prevention

- i. Authorized parties will be required to develop and be prepared to implement a fire prevention and an emergency response plan that covers all aspects of operations, which will include: coordination with local jurisdictions, such as the cities, counties, landowners, IDL, rangeland fire protection associations, and federal land agencies; emergency contact numbers and information, including 911 and local fire dispatch centers; and fire prevention and safety procedures that will include evacuation routes and procedures, the designated safety meeting place, and emergency shutdown procedures.
- ii. Field personnel for authorized parties will carry an emergency response plan; a shovel; a fire extinguisher; and an adequate radio, cell phone, or special communications equipment within their vehicles and construction equipment (or, if on extended foot-based exploration activities, on their person). All fires will be reported immediately.
- iii. Authorized parties will ensure that field personnel are aware of:
  - a. fire prevention and emergency response plan,
  - b. evacuation routes and procedures,
  - c. designated safety meeting places, and
  - d. emergency shutdown procedures.

- iv. Authorized parties will park vehicles on bare ground that has been cleared of all vegetation. Vehicles will be inspected immediately after parking to verify vegetation is not touching catalytic converter, manifold, muffler, or exhaust.

#### **b. Invasive Species**

- i. Vehicles and equipment operated by IDL or authorized parties that will travel off approved /designated transportation routes will be inspected and cleaned of seeds and propagules to prevent the spread of invasive and noxious plant species.
- ii. Through a cooperative effort, invasive and noxious plant species will be inventoried and monitored pre-disturbance and throughout the life of the project by IDL and the authorized party.
- iii. Reclamation activities should include certified weed-free seed mixes, approved by the IDL or surface owner. All materials used for reclamation (mulch, straw, etc.) should be certified weed free by the appropriate federal or State of Idaho agency.
- iv. Authorized parties will use BMPs and appropriate treatments including chemical, mechanical and biological to treat invasive and state listed noxious plant species. When regulated chemicals are determined to be the best treatment, authorized parties will use Idaho licensed professional applicators to treat noxious plant species with the approved and properly documented herbicide. Weeds will be treated promptly when located on a project site.

#### **c. Surface Use and Timing**

- i. Controlled surface use and timing limitations should be applied within Core and Important habitat zones, unless species occupancy and distribution determined by IDFG recommends otherwise.
- ii. During lekking periods, as determined locally (approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations), project activities will be avoided to the extent possible within 1 km (0.62 mile) of occupied leks between 6 p.m. and 9 a.m. to avoid disturbance to lekking and roosting sage-grouse. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000-foot elevation may be used as a general distinction.
- iii. Major construction and maintenance activity should be avoided by authorized parties in sage-grouse winter range (winter concentration areas) from December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology.

#### **d. Noise**

- i. Limit noise levels from discretionary activities within Core and Important habitat zones to no more than 10 decibels above ambient sound levels (typically 20-24 dBA) at occupied leks from two hours before sunset to two hours after sunrise during breeding season. Ambient noise levels should be determined by measurements taken at the perimeter of an occupied lek at sunrise.
- ii. Authorized party will keep noise levels on existing infrastructure within the 0.62 mile buffer to 65 decibels or less.

#### **e. Fencing**

- i. New and existing wire fence segments constructed by authorized parties that are located in high risk areas will be marked according to the NRCS Fence Collision Risk Tool which is based on (Stevens et al. 2012) using collision diverter fence markers as defined by NRCS design practices (Stevens, 2011). Examples of high risk areas include fencing with characteristics such as evidence of grouse fence strikes, gentle topography near a lek, or fences that bisect winter concentration area.
- ii. As necessary and feasible, fence springs, seeps, and riparian areas in order to maintain, restore, and foster progress toward Proper Functioning Condition (PFC) of riparian wetland areas. PFC assessment is a qualitative method for considering the attributes and processes of hydrology, vegetation, and erosion/deposition of soils (TR1737-16, 2003 USDA-NRCS). PFC of riparian wetland areas facilitates management objectives for Core and Important habitat zones.

#### **f. Water Supply Structures**

- i. New or modified spring developments (including pipelines) should be designed by authorized parties to maintain or enhance the free-flowing characteristics of springs and wet meadows, which will help maintain continuity of the pre-developed riparian areas.
- ii. The construction of new ponds or reservoirs by authorized parties should be minimized, except as needed to meet important resource management or restoration objectives, to reduce the potential impact from West Nile Virus on sage-grouse. On projects requiring water to be pumped such as solar, hydro or fossil fuel operation, floated tanks should be allowed to conserve water resources and efforts should be made by the authorized parties to treat these tanks for mosquito species that carry West Nile Virus.

- iii. Wildlife escape ramps in new and existing water troughs and open-water storage tanks should be developed to facilitate the use of and escape by wildlife.

**g. Constructed Improvements**

- i. Construction methods should be implemented by authorized parties that minimize surface disturbance. This could include utility placement through borings instead of trenches.
- ii. Infrastructure should be placed by authorized parties in already-disturbed locations, as feasible, where the habitat has not been established. Infrastructure, such as pipelines, should be located along roads already in existence or required to be newly constructed for access to facilities. Requirements from public utilities will be followed for all installations.
- iii. Surface disturbances should be clustered in order to limit surface occupancy.
- iv. New utility developments and transportation routes should be located by authorized parties in existing utility or transportation corridors, as allowable by any existing right-of-way restrictions.
- v. Transmission towers should be outfitted by authorized parties with anti-perch devices in occupied sage-grouse habitat.
- vi. New structures with a height over five feet should not be constructed by authorized parties within one km of occupied leks. To the extent practicable, power lines, towers, and other tall structures that provide perch sites for raptors will not be constructed within three km of breeding period habitats. If these structures must be built the power lines should be buried or the structures modified to prevent their use as raptor perch sites. Screening or other mitigation may also be used.
- vii. Construction plans developed by authorized parties should include options that deter raptor perching and raven nesting on elevated structures.
- viii. Permanent structures that create movement will be minimized within Core and Important habitat zones. Painting, shielding, or other measures can be implemented to mitigate potential impact from these structures.

#### **h. Site Reclamation**

- i. Site reclamation should be completed by authorized parties as soon as phases of operations or construction are completed. Site accessibility and timing conditions for successful germination will be taken into consideration.
- ii. Reclamation activities and plans should consider the ecological site potential. The goal of the reclamation should be: (a) to stabilize the site with plant species that are suitable to the site and include sage brush and native forb species; (b) provide the opportunity for sage-grouse habitat to develop over time; and (c) prevent non-native invasive species from occupying the site.
- iii. Sites should be irrigated or mulched appropriately by authorized parties if necessary for establishing seedlings more quickly.

#### **16. Range Management/Livestock Grazing**

IDL does not have general regulatory authority over livestock grazing on non-state lands.

#### **17. Wild Horses and Burros**

IDL does not have regulatory authority over wild horses and burros.

#### **18. Travel Management**

IDL does not have general regulatory authority over travel management on non-state lands.

#### **19. Recreation**

IDL does not have general regulatory authority over recreation on non-state lands.

#### **20. Implementation and Monitoring**

Implementation of the CMs through voluntary agreement will be incorporated into existing permit procedures. A copy of the applicable CMs will be provided to all applicants for a permit on lands located in Core or Important habitat zones. As part of the application, applicants will acknowledge which, if any, CMs they are willing to voluntarily comply with. Those CMs will then be incorporated into the permit as an enforceable stipulation of the permit. See Appendix B for IDL's DRAFT Implementation Plan.

Monitoring of CMs stipulated in the permit will be incorporated into existing permit inspection procedures. Inspection forms will be amended to include a section for documenting that CMs were implemented and an assessment of their effectiveness. See Appendix E for IDL's DRAFT Monitoring Plan (not yet completed).

Procedures for Abandoned Mine Lands projects will be amended to include an assessment of the impact on sage-grouse when the project includes lands within Core or Important habitat zones. The results of this assessment will be used to determine the appropriate CMs to be implemented as part of the project.

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## Appendix A

### Glossary

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## Habitat Classifications

**Core Sage-Grouse habitat:** State of Idaho delineation of strongholds for Sage-Grouse populations in Idaho. This habitat is the highest priority for conservation efforts and for policies to address primary threats. It includes approximately 65 percent of known active leks and occupied by approximately 73 percent of male Sage-Grouse counted at leks throughout the Idaho Sage-Grouse management area.

**Important Sage-Grouse habitat:** State of Idaho delineation defined as the 75 percent breeding bird density areas. This habitat includes areas of value for migration corridors, connectivity among breeding areas, and long term persistence of each of the two key metapopulations of Sage-Grouse in Idaho. It includes approximately 25 percent of the known active leks. This habitat is occupied by an estimated 22 percent of Sage-Grouse males. Captures high quality habitat and populations necessary for providing a management buffer for the core habitat.

**Key Habitat:** State of Idaho delineation of areas of generally intact sagebrush that provide sage-grouse habitat during some portion of the year including winter, spring, summer, late brood-rearing, fall, transition sites from winter to spring, spring to summer, and summer/fall to winter. Key habitat may or may not provide adequate nesting, early brood-rearing, and winter cover due to elevation, snow depth, lack of early season forbs, limited herbaceous cover, or small sagebrush patch size.

**Priority Sage-Grouse habitat:** Areas that have been identified as having the highest conservation value to maintaining sustainable Sage-Grouse populations. These areas would include breeding, late brood-rearing, and winter concentration areas. The BLM has identified these areas in coordination with respective state wildlife agencies.

**General Sage-Grouse habitat:** Occupied (seasonal or year-round) habitat outside of priority habitat. It includes a few active leks and fragmented or marginal habitat, such as two isolated populations of Sage-Grouse in the East Idaho Uplands and West Central Idaho. These areas have been identified by the BLM in coordination with respective state wildlife agencies.

## Lek Classification

**Lek:** A traditional courtship display area attended by male Sage-Grouse in or next to sagebrush-dominated habitat. A lek is designated based on observations of two or more male Sage-Grouse engaged in courtship displays. Subdominant males may display on itinerant courtship display areas during population peaks. Such areas usually fail to become established leks. Therefore, a site where less than five males are observed strutting should be confirmed active for two years before meeting the definition of a lek (Connelly et al. 2000; Connelly et al. 2003, 2004). Each state may have a slightly different definition of lek, active lek, inactive lek, occupied lek, and unoccupied leks. Regional planning will use the appropriate definition provided by the state of interest.

**Lek buffer:** Buffers are calculated from the center (IDFG GPS coordinate) of the lek. Exact lek edges are difficult to define because leks shift and birds move on any given day.

**Lek complex:** A lek or group of leks within 2.5 kilometers (1.5 miles) of each other between which male Sage-Grouse may interchange from one day to the next. Fidelity to

leks has been well documented. Visits to multiple leks are most common among yearlings and less frequent for adult males, suggesting an age-related period of establishment (Connelly et al. 2004).

**Lek, abandoned:** A lek in otherwise suitable habitat that has not been active for 10 consecutive years. To be designated abandoned, a lek must be inactive (see above criteria) in at least four nonconsecutive courtship display seasons spanning the 10 years. The site of an abandoned lek should be surveyed at least once every 10 years to determine whether it has been reoccupied by Sage-Grouse.

**Lek, active:** Any lek that has been attended by male Sage-Grouse during the courtship display season.

**Lek, destroyed:** A formerly active lek site and surrounding sagebrush habitat that has been destroyed and is no longer suitable for Sage-Grouse breeding.

**Lek, inactive:** Any lek where sufficient data suggests that there was no courtship display activity throughout a lekking season. Absence of strutting grouse during a single visit is insufficient documentation to establish that a lek is inactive. This designation requires documentation of one of the following scenarios:

- An absence of Sage-Grouse on the lek during at least two ground surveys separated by at least seven days. These surveys must be conducted under ideal conditions (April 1-May 7 or other appropriate date based on local conditions), no precipitation, light or no wind, half-hour before sunrise to one hour after sunrise).
- A ground check of the exact known lek site late in the courtship display season (after April 15) that fails to find any sign (tracks, droppings, feathers) of strutting activity. Data collected by aerial surveys should not be used to designate inactive status as the aerial survey may actually disrupt activities.

**Lek, occupied:** A lek that has been active during at least one strutting season within the prior 10 years. This is the status IDFG recommends for long term decision making.

**Lek, undetermined:** A lek that has not been surveyed to determine status.

**Lek, unoccupied:** A lek that has either been destroyed or abandoned.

## **Habitat Use and Periods**

**Breeding period:** Includes lekking, nesting and early brood-rearing periods, generally March 1 through June 30 (Connelly et al. 2000b).

- *Early brood rearing habitat:* Generally upland sagebrush habitats relatively close to sage-grouse nest sites. These areas are important to broods during the first few weeks after hatching. Forb and insect abundance and diversity are important factors. (See Connelly et al. 2000b)

**Late brood rearing:** This occurs in a variety of habitats used by sage-grouse from late June to early November.

- *Late Brood-rearing habitat:* Includes mesic sagebrush and mixed shrub communities, wet meadows, and riparian habitats, as well as some agricultural lands (e.g., alfalfa fields).

**Lekking period:** This should be determined locally, but approximately March 15-May 1 in lower elevations and March 25-May 15 in higher elevations. The terms *low* and *high* elevation are used generally. IDFG biologists with knowledge of the timeline for local lek routes usually advise when a lek should be checked. For planning purposes a 5,000 foot elevation may be used as a general distinction.

**Nesting period:** Generally April 1 through June 15.

**Winter concentration periods:** For the purpose of this plan, generally December 1 to February 15. Specific dates may be earlier or later, depending on local breeding chronology. IDL shall confer with IDFG biologists for local variations.

- *Sage-Grouse winter habitats:* Occupied annually by Sage-Grouse and provide sufficient sagebrush cover and food to support birds throughout the entire winter (especially periods with above average snow cover).

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Appendix B  
Implementation Plans

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# IDL Sage-Grouse Conservation Plan- Implementation

## Part I. Implementation Plan for Endowment Land Activities

The following Implementation Plan (IP) will apply to activities on state endowment trust lands within Core and Important sage-grouse habitat zones in response to the IDL Greater Sage-Grouse Conservation Plan. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- alternative energy development (solar, wind, and geothermal leases and land use permits);
- oil and gas exploration and development (leases and land use permits);
- mining (minerals leases, land use permits and construction permits);
- grazing (grazing leases, land use permits and construction permits);
- miscellaneous commercial activities (commercial leases, land use permits and construction permits); and
- granting of access through rights-of-way, including easements.

This document also addresses the implementation of fire prevention and mitigation measures and wildfire suppression efforts to minimize the impact to sage-grouse and their habitat.

### I. Previous Authorizations Granted by IDL

IDL recognizes that written authorization through leases, permits and easements has been granted to third parties for activities on state endowment trust lands within Core and Important habitat zones prior to the approval of the IDL Greater Sage-Grouse Conservation Plan. These authorizing documents logically do not contain the conservations measures identified in the IDL Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important habitat zones.
- Within 6 months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within **Core habitat zones**. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.

- Within 18 months of the date of the ROD, IDL will develop instrument modifications for each authorizing document identified in the GIS analysis within **Important habitat zones**. The instrument modifications will identify the appropriate stipulations for the activity and allow the instrument holder the opportunity to agree to these instrument terms.
- Once developed, IDL will mail the instrument modifications to the instrument holders with a cover letter explaining the purpose of the instrument modification and encourage their execution of the document due to the benefits to the Greater Sage-grouse and their habitat. The letter will identify a 30-day timeframe for their response.
- IDL will follow-up in writing with those instrument holders that do not respond within 30 days, offering them a second opportunity to accept the instrument modification.
- If an instrument holder does not agree to the instrument modification, IDL will attempt to make direct contract with the party to discuss the conservation measures and provide educational and supporting documents that would encourage their participation. In addition, IDL will identify which conservation measures are sticking points and give consideration, on a case-by-case basis, to negotiating conservation measure stipulations and come to an agreement on those measures that are acceptable to the instrument holder. As a fallback measure, IDL would include conservation measures as stipulations in any new authorization following the expiration of the existing authorization.

## II. **Future Authorizations to be Granted by IDL**

For new activities proposed by third parties on state endowment trust lands in Core and Important habitat zones and for new instruments generated following the expiration of an instrument that expires after the date of the ROD, IDL will implement conservation measures as enforceable stipulations in authorizing documents such as leases, land use permits, construction permits and rights-of-way.

IDL will develop and implement specific instrument templates that include the appropriate conservation measures as mandatory and enforceable stipulations. As a result, all new authorizations granted by IDL within Core and Important habitat zones will contain conservations measures in alignment with the IDL Greater Sage-Grouse Conservation Plan. IDL will provide these instrument templates to third parties inquiring about or making application for a proposed activity within a Core and Important habitat zone and explain the significance of these stipulations.

## III. **Fire Prevention and Mitigation Measures and Wildfire Suppression Efforts**

IDL does not have direct wildfire suppression responsibilities within any Greater Sage-Grouse core or important habitats in Idaho. However, IDL does have jurisdictional authority for state lands within Greater Sage-Grouse habitat.

Wildland fire protection for federal, state and private lands within Greater Sage-Grouse habitat in southern Idaho is provided by federal agencies through the **Cooperative Fire**

**Protection and Stafford Act Agreement** and by the cooperative efforts of volunteer Rangeland Fire Protection Associations (RFPA's) and fire service organizations (city, county and rural fire departments).

In the interest of promoting conservation efforts of the Greater Sage-Grouse and its habitat under this plan, IDL will:

1. Provide maps to all Rangeland Fire Protection Associations (RFPA's) that include the location of any designated core or important Greater Sage-Grouse habitat within their RFPA boundaries by May 10, 2015 (Beginning date of closed fire season in Idaho as designated in Idaho Code Title 38 Section 115.).
2. On any fire affecting or threatening important or core habitat on state or private lands requiring an Incident Management Team (IMT), IDL will assign an IDL line officer to jointly work with the federal protecting agency to develop Greater Sage-Grouse conservation objectives for fire suppression activities that will be incorporated into:
  - a. the Wildland Fire Decision Support System (WFDSS);
  - b. the Leader's Letter of Intent to the team;
  - c. the joint Delegation of Authority; and
  - d. ensure the objectives are fully implemented in daily Incident Action Plans.
3. Conservation objectives will include:
  - a. Incident priorities:
    - i. Firefighter safety
    - ii. Public Safety
    - iii. Improvements
    - iv. Resource Values
      - Sage Grouse core and important habitat
      - Other resource and property values (historical, archeological, recreational, aesthetics, livestock, etc.).
  - b. Utilize direct attack as the primary tactic to minimize burned acres in Greater Sage-Grouse core and important habitat.
  - c. Accept relatively small acreage, short-term ground disturbance due to heavy equipment use to meet higher objectives.
  - d. Rehabilitation for burned acres will promote reestablishment of Greater Sage-Grouse habitat within or adjacent to core and important habitat.
4. IDL will consider and promote fire prevention and mitigation measures including but not limited to:
  - a. Master fuelbreak systems across all ownerships.
  - b. Proposals to adjust fire restriction boundaries and associated use restrictions in the Idaho Fire Restrictions Plan based on protection of core and important Greater Sage-Grouse habitat.
  - c. Develop annual grazing plans or targeted grazing practices to reduce fuel loading in locations that would be advantageous as a wildfire control location.

## Part II. Implementation Plan for IDL's Regulatory and Assistance Activities

The following Implementation Plan (IP) will apply to regulatory and assistance activities administered by IDL within Core and Important sage-grouse habitat zones. The IP was developed in response to the IDL Greater Sage-Grouse Conservation Plan. Conservation measures will be voluntary best management practices on private land because IDL does not have the statutory authority within its regulatory or assistance programs to require adoption by authorized parties. The following IP addresses authorizations previously granted by IDL and authorizations that may be granted by IDL in the future. These activities include:

- Dredge and placer mining (exploration notices and permits);
- Surface mining (exploration notices and reclamation plans);
- Oil and gas exploration and development (seismic and drilling permits, spacing requests);
- Abandoned mine land reclamation.

### I. Previous Authorizations Granted by IDL

IDL recognizes that written authorizations through permit and plan approvals and contracts have been granted to third parties for activities within Core and Important habitat zones prior to the approval of the IDL Greater Sage-Grouse Conservation Plan. These authorizing documents do not contain the conservation measures identified in the IDL Greater Sage-Grouse Conservation Plan that would be included with authorizations granted today or in the future by IDL. To resolve this matter IDL will accomplish the following:

- Within 60 days of the date of the Record of Decision (ROD) for the Final Idaho and Southwest Montana Sub-regional Sage-grouse LUPA and EIS, IDL will complete a comprehensive GIS analysis to determine the type, number and location of all IDL authorizing documents within Core and Important habitat zones.
- No outstanding abandoned mine lands contracts are present in Core and Important sage grouse habitat zones.
- Within 6 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within **Core habitat zones**. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.
- Within 18 months of the date of the ROD, IDL will develop appropriate conservation measures for each authorizing document identified in the GIS analysis within **Important habitat zones**. IDL will also notify each operator that their activity falls within this zone, and provide the conservation measures to the operators.
- If impacts to GRSG habitat are irreversible, IDL will suggest working within the Idaho Mitigation Framework and utilizing the compensatory mitigation process the State Sage-grouse Advisory Committee develops.

- Ongoing inspections of these operations will include recommendations that give guidance on how the operators can follow the conservation measures

## **II. Future Authorizations to be Granted by IDL**

IDL will develop an information brochure for oil and gas and mining operators who want to explore or develop minerals in Core and Important habitats.

For new activities proposed in Core and Important habitat zones and for amendments to existing approved activities, IDL will forward the applications to IDFG for comments and recommendations.

During the review process, IDL will suggest GRSG conservation measures to those mine operators based on:

- Feedback from IDFG
- GRSG conservation measures in the IDL plan
- The specific details of the proposed mine

New abandoned mine land projects in Core and Important habitat will be implemented by IDL in conformance with the IDL Greater Sage-Grouse Conservation Plan. This includes inspections and work performed by IDL staff, as well as those performed by contractors and subcontractors.

As a result, all new authorizations granted by IDL within Core and Important habitat zones will include recommendations for conservation measures in alignment with the IDL Greater Sage-Grouse Conservation Plan. IDL will work with the operators as needed to implement the conservation measures or to implement voluntary mitigation measures, if needed.

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Appendix C  
Wildfire Protection in Idaho  
Responsibilities and Funding

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## **Wildfire Protection in Idaho Responsibilities and Funding Model**

### **How is fire response organized in Idaho?**

There are approximately 53.5 million acres of land in Idaho, which is divided into 16 forest protective districts. Two of these districts cover lands protected by the Forest Service and the Bureau of Land Management (BLM), and two are tribal districts. The State of Idaho – the Idaho Department of Lands (IDL) and two timber protective associations – provide direct wildfire protection on approximately 6.3 million acres of private, state and some federal forest lands.

The BLM provides primary wildfire protection on most of the lands that have sage-grouse habitat in Idaho.

Due to the scattered nature of ownership in Idaho, some state and private lands are located within federal protection areas, while some federal lands are located within state protection areas. These are known as “offset acres.” Fire managers assign a relative value to each acre to characterize how easily fires can be ignited and how difficult those fires likely will be to control. Through an “offset agreement” the federal agencies protect approximately 900,000 acres of private and state endowment land around Idaho in exchange for the State of Idaho protecting approximately 800,000 acres of federal land. Generally speaking, forested lands in Idaho are included in the offset agreement and rangelands in Idaho are not included the offset agreement.

More than 200 local and rural fire districts provide structure protection in generally non-urban parts of the state that would otherwise not have structural fire protection.

Five rangeland fire protection associations (RFPAs) assist the BLM in providing initial attack on rangelands in southern Idaho. IDL works closely with the BLM and ranchers to establish RFPAs to enable quick initial attack of range fires. Approximately 230 ranchers in southern Idaho are members of five different RFPAs, and there are six additional areas where ranchers have begun to have conversations about starting new associations. IDL expects at least one more RFPA to be formed before the start of the 2015 fire season. Continued support of RFPAs is a key part of the IDL Sage Grouse Conservation Plan. The RFPAs are volunteer initial attack organizations and are not intended to participate in extended attack situations.

Page 4 of Appendix C shows a 2014 map of forest protection district boundaries and current RFPA boundaries in Idaho.

### **Funding Fire Suppression in Idaho**

Fire protection funding is grouped into two categories – preparedness and suppression.

- ***Preparedness:*** The first is preparedness, providing resources to be ready in advance of an actual fire. This includes hiring firefighters, ensuring they have the necessary training, tools, and supplies, and purchasing or leasing equipment such as fire engines. In FY14 IDL spent approximately \$11 million in preparedness costs.

Preparedness on state-protected lands is funded by a combination of assessments levied on parties who own forested land, federal funds, and the State General Fund.

The forest land assessment is 60 cents per acre with a surcharge for forested parcels with structures. The IDL, in its role as the owner of endowment lands, contributes to preparedness expenses, just like private forest landowners. In FY14 IDL contributed 60 cents per acre on 974,312 endowment acres that receive protection from the fire management function of IDL, for a total of \$584,587.

In recognition that the value Idahoans place on forests is not limited to harvestable timber, Idaho Code spreads the costs of protection beyond timber. While still requiring forest landowners to provide protection, the law limits the potential liability accruing to the landowner by establishing maximum protection assessments and committing general fund tax revenue to cover expenses over that amount.

- **Suppression:** The second component of wildfire protection is suppression. There is a stable source of funding to pay wildfire suppression costs on lands protected by the State of Idaho. When personnel and equipment are dispatched to a fire managed by the State of Idaho, payment for resources assigned to the fire is made from the General Fund through deficiency warrant authority granted by the Idaho Legislature to the State Board of Land Commissioners. Contracts for aircraft also are charged to deficiency warrants. Deficiency warrant authority allows IDL to spend money to promptly suppress wildfires. Deficiency warrants have been used since at least the early 1970s. When the Idaho Legislature convenes in January it reviews the suppression bills incurred during the previous and current fiscal years, and appropriates funds to pay for the expenditures.

The 10-year average of suppression costs on lands protected by the State of Idaho, including the 2014 fire season, is approximately \$10.5 million. The 10-year average fire size on lands protected by the State of Idaho, including the 2014 fire season, is approximately 19,000 acres. In FY14, IDL employed 261 permanent employees and 202 seasonal employees. Fifty-five percent of IDL FY14 permanent employees worked in a forestry and fire capacity, and during fire season the total percentage of permanent employees contributing to IDL fire duties expands because many members of staff who are not categorized as “fire” help in fire efforts. These staff members are part of fiscal, GIS, operational leadership, administrative staff, and executive staff. Sixty percent of the IDL FY14 seasonal workforce worked in forestry and fire (38 percent in fire).

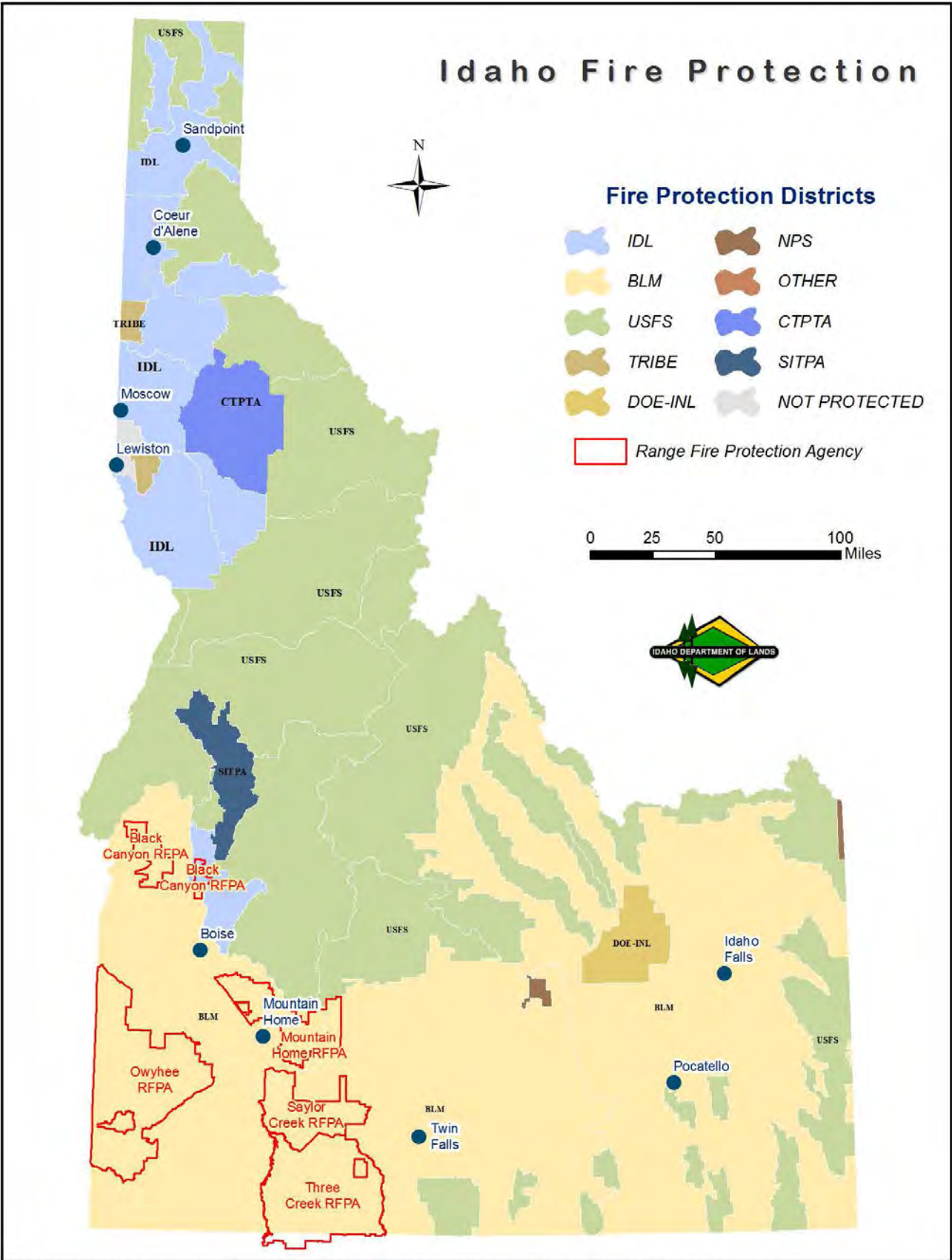
***If a fire starts on forest land in Idaho***, regardless of ownership (federal, state, or private), the protection agency (Forest Service, BLM or IDL) is responsible for paying the suppression bill, not the owner of the land where the fire starts or burns. However, if a fire investigator determines negligence is a factor in igniting a human-caused fire, the responsible party is responsible for paying the suppression costs.

***If a fire starts on privately owned rangeland***, then the responding agency (BLM, rangeland fire protection association, rural fire district, or sometimes the Forest Service) bears the cost of its own suppression action. In cases involving declared emergencies, the Federal Emergency Management Agency (FEMA) may cover a portion of the costs if communities or infrastructure are threatened. The State of Idaho does not have direct wildfire protection responsibility on rangelands.

**Currently by agreement, if a fire starts on rangeland owned by the State of Idaho,** does not spread to another ownership and is suppressed by the BLM, then the IDL will pay the suppression costs. If a fire starts on rangeland owned by the State of Idaho and spreads to another ownership, then IDL will pay a pro-rata share of the BLM's suppression costs. The IDL does not share in suppression costs when a fire starts on another ownership and spreads onto or across rangeland owned by the State of Idaho.

While IDL does incur fire suppression costs when the State of Idaho assists federal fire managers on fires they manage, the federal agencies reimburse IDL for use of State personnel and resources.

# Idaho Fire Protection



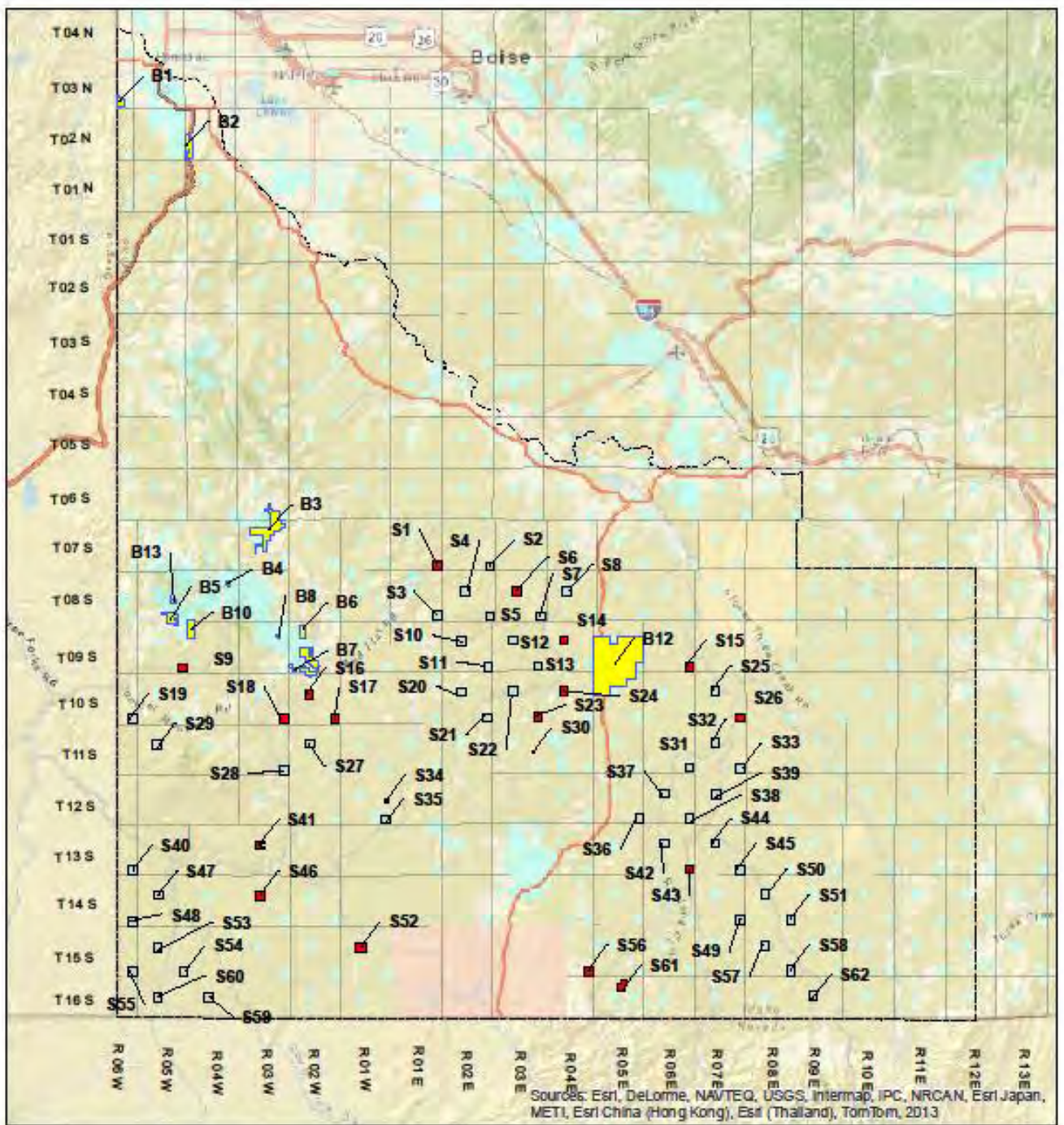
X:\Projects\mis\Map\_requests\Emily\FireProtectionLocations\_IndexMapApril2015.mxd EDY 2 April 2015

Appendix D

Owyhee Land Exchange Map

DRAFT

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### Legend

- BLM Exchange Parcel
- IDL Exchange Parcel
- IDL Removed from Exchange
- Other State Lands
- Private
- Bureau of Land Management
- US Forest Service
- Other Federal Ownership/Control
- Tribal Lands
- Owyhee County Boundary

## Owyhee Land Exchange

### Parcel Index Map

2/18/2015  
Scale: 1:1,350,000  
0 5 10 Miles

### Map Notes

Projection: Idaho Transverse Mercator, NAD 27  
Map Note and Data Sources:  
BLM Exchange Data as of Feb. 2014  
IDL Ownership Data current as of map date

**Disclaimer:**  
This map has been compiled using the best information available to the Idaho Department of Lands at the time and may be updated and/or revised without notice. In situations where known accuracy and completeness is required, the user has the responsibility to verify the accuracy of the map and the underlying data sources.

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Appendix E  
Monitoring Plan  
(To be completed)

DRAFT

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## Brent Ralston

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**From:** Tripp, Kim  
**Sent:** Wednesday, April 01, 2015 7:46 AM  
**To:** Arlene Kosic; Erin Jones; Glenn Frederick; Joan Suther; Jonathan Beck; Pamela Murdock; Quincy Bahr; Brent Ralston; Ronald Bolander; Hal Hallett; Johanna Munson; Lisa Belmonte; Scott Hoefer; Jake Chaffin; John Carlson; Lauren Mermejo; Mark Snyder; Matthew Magaletti; Christopher Keefe  
**Subject:** Re: GRSB BA Coordination

Hi again.

To ensure that I can see all edits that you have added on the table, please send me a quick email indicating when you have completed your entries. As of Wed am. I only see an entry from Oregon.

Thanks,  
Kim

Kim Tripp  
National Threatened and Endangered Species Program Lead  
Bureau of Land Management  
Division of Fish and Wildlife  
20 M Street SE  
Washington, D.C. 20003  
Office: 202-912-7237  
Cell: 202-573-4140  
Fax: 202-245-0028

On Tue, Mar 31, 2015 at 2:49 PM, Tripp, Kim <[ktripp@blm.gov](mailto:ktripp@blm.gov)> wrote:  
thanks for updating me on BA progress.

Please fill out table no later than COB Friday April 3, 2015

remember to open doc in "google docs" for editing option.

<https://drive.google.com/a/doi.gov/file/d/0B0yVXjjwuEFecE1VdXptTENZTTQ/view?usp=sharing>

**Direction for BLM/FS BA transmittal (except for WY 9 plan)**

**transmit by April 24 when BA is final and EIS is complete (including CEA) and shared with FWS**  
**send transmittal from respective BLM state office**  
**use template provided by Chris Colt and I (provided week of 4/13)**

Kim Tripp  
National Threatened and Endangered Species Program Lead  
Bureau of Land Management

Division of Fish and Wildlife  
20 M Street SE  
Washington, D.C. 20003  
Office: 202-912-7237  
Cell: 202-573-4140  
Fax: 202-245-0028

**Brent Ralston**

---

**From:** Tripp, Kim  
**Sent:** Wednesday, April 29, 2015 9:40 AM  
**To:** Arlene Kosic; Erin Jones; Glenn Frederick; Joan Suther; Jonathan Beck; Pamela Murdock; Quincy Bahr; Brent Ralston; Ronald Bolander; Hal Hallett; Johanna Munson; Lisa Belmonte; Scott Hoefer; Jake Chaffin; John Carlson; Lauren Mermejo; Mark Snyder; Matthew Magaletti; Christopher Keefe; Doug Laye; Colt, Chris J -FS  
**Cc:** Stephen Small; Stephanie Carman; Glen Stein; Vicki Herren  
**Subject:** GRSG BA TRANSMITTAL LETTER for use  
**Attachments:** GRSG BA ConcurLtrKT4-24.docx

Hello

As discussed, I have worked with FWS and FS to put together a template transmittal letter for you to use in submitting your final BA to the FWS.

Hopefully the format is self-explanatory, but here a few points of clarification.

Letter will be transmitted from BLM but will also be on behalf of FS as well. You can anticipate that the FWS will address both agencies in their single response.

Letter is in Memo format because it's being submitted from a DOI agency to a DOI agency.

My recommendation is that the BA's be submitted from the respective state office and if there are more than one BA (more than one LUP amendment) is being submitted within that state, they should fall under one cover letter. The one distinction I would make is to create a separate determination table for each LUP, but contain them in one letter.

Please populate the table with ALL species being addressed in the BA. Such a format offers a much more efficient review process for the FWS.

If you have a need to adjust the transmittal letter based on the nature of your particular request to the FWS, you have that latitude.

All final BA's are expected to be transmitted to the FWS within the first week of May (no later than May 8).

Please re-read your entries in the GRSG EIS BA Table (attached) to ensure that your process is moving forward as reported. If there are changes, then please update asap.

As indicated in the cc line. please ensure that copies are sent to the specified individuals (an email copy to me is sufficient).

Thanks for all your hard work.

Best,  
Kim

Kim Tripp  
National Threatened and Endangered Species Program Lead  
Bureau of Land Management  
Division of Fish and Wildlife  
20 M Street SE  
Washington, D.C. 20003  
Office: 202-912-7237  
Cell: 202-573-4140  
Fax: 202-245-0028



**GRSG EIS BA updates 3-31-2015**

To: Field Supervisor, Ecological Services Office

From: BLM XXXX State Director

Subject: The Bureau of Land Management (BLM) and U.S. Forest Service (USFS) request consultation on the effects to listed species and critical habitat from the proposed Greater Sage-grouse Land Use Plan Amendment REPLACE with NAME/S of PLAN AMENDMENT/S (Amendment/s).

Date: April 24, 2015

CC: USFS Regional Forester, Chris Colt, Glen Stein, Kim Tripp, Doug Laye

Through this memorandum the BLM and the USFS are requesting consultation under Section 7 of the Endangered Species Act of 1973, as amended. The BLM and USFS have coordinated informally with the U.S. Fish and Wildlife Service (USFWS) to develop this biological assessment (BA) which describes and analyzes the potential effects of the proposed Amendment/s on federally listed and proposed species and their respective designated and proposed critical habitat.

The purpose of the Amendment is to conserve areas that have been identified as having the highest value to maintaining the Greater Sage-grouse (GRSG) and its habitat. These Priority Habitat Management Areas will be protected by a suite of tools and mechanisms, such as excluded activities, disturbance limits, restrictions, mitigation measures, and applying required design features. These overlapping and reinforcing mechanisms will work in concert to conserve sage-grouse throughout its lifecycle. Taken together, the actions we are taking in priority habitat will limit potential development on these lands.

In general, the conservation measures applied on behalf of the GRSG will also provide conservation value to other species including federally listed plants and animals. In instances where there may be some possible conflicts with federally protected species, conservation measures specific to individual species are incorporated into the Amendment and/or BA as part of the federal action to avoid or greatly reduce any discernable effects. Within this context of conservation benefits, avoidance measures and effect reduction efforts, the BLM and USFS have made the following effects determinations for the federally listed and proposed species and critical habitat analyzed in the BA:

Species Name	Federal Status	Effects Determination
(e.g. Southwest Willow Flycatcher)	proposed, threatened, endangered	no effect, may affect not likely to adversely affect, may affect likely to adversely affect
(e.g. Southwest Willow Flycatcher Critical Habitat)	proposed, designated	no effect, may affect not likely to adversely affect, may affect likely to adversely affect

The BLM and USFS request the USFWS's concurrence on our may affect and not likely to adversely affect determinations for the listed species and designated critical habitat. We also request your concurrence on our jeopardy determinations for proposed species and proposed critical habitat.

Although this memorandum is transmitted under BLM letterhead and signature, our request is also on behalf of the USFS. Thank you for your agency's cooperation throughout this planning process. We look forward to your reply.



# IDL SAGE-GROUSE CONSERVATION

## *OVERVIEW*

IDMT\_PUB\_9759  
4.1



- HOW DID WE GET HERE?
- SUMMARY OF ACRES OF HABITAT
- CONSERVATION MEASURES by PROGRAM
- NEXT STEPS
- QUESTIONS

# IDL SAGE-GROUSE CONSERVATION

## ***HOW DID WE GET HERE?***

2010 –USFWS 12 month finding of

WARRANTED BUT PRECLUDED status

Primary Threat =

FRAGMENTATION OF SAGE-GROUSE HABITAT by:

- CONVERSION of HABITAT for AG or URBAN
- INADEQUATE REGULATORY MECHANISMS
- INFRASTRUCTURE (ROADS, ENERGY)
- INVASIVE SPECIES
- WILDFIRE



# SAGE GROUSE TIMELINE

2011- US DISTRICT COURT OF D.C. Multi-district  
Litigation Settlement Agreement

2012 - US DISTRICT COURT, IDAHO  
USFWS Must Reevaluate Status by Sep 30, '15

SEC. OF INTERIOR INVITED 11 WEST STATES to  
DEVELOP STATE-SPECIFIC REGULATORY  
MECHANISMS to PRECLUDE A LISTING UNDER the  
ENDANGERED SPECIES ACT

March 2012 - GOV OTTER FORMS TASK FORCE

## *TIMELINE, CONT'D*

Sep '12 - Gov Plan (Alternative) for Fed Land

Nov '13 - BLM Draft Idaho + SW Montana Sub-Regional GSG LUPA/EIS

Oct '14 –Director Schultz Forms Work Group to Develop Conservation Measures for State Endowment Trust Land + IDL Regulatory Authority to Complement the Gov Plan For Fed Land

Dec '14 - CRomnibus Conservation riders

Western Gov Assoc. letter to DOI

Gunnison's Sage-grouse lawsuit filed

# Endowment Ownership in Sage-grouse Habitat

Habitat Zone	All Owners (acres)	IDL Surface Owner (acres)	IDL Surface Owner (%)	IDL Minerals Only (acres)	IDL Minerals Only (%)
Core	6,018,364	363,291	6.04	26,121	.66
Important	4,502,658	256,280	5.69	43,307	.96
total	10,521,022	619,571	<b>5.89</b>	69,428	.66

# Surface Owner w/in 0.6 Mile Lek Buffer

Habitat Zone	Total Acres All Owners	Acres of IDL Surface Owner	IDL % of All Owner
Core	431,096	40,309	9.35
Important	166,059	6,652	4.01
Total	597,155	46,961	7.86

# IDL SAGE-GROUSE CONSERVATION MEASURES

FOCUSED ON 3 PRIMARY THREATS FOR IDAHO

- WILDFIRE
- INFRASTRUCTURE

» *REGULATORY AUTHORITY*

- INVASIVE SPECIES

LEASE STIPULATIONS for STATE TRUST LAND

NON-REGULATORY BMPS for

REGULATORY PROGRAMS

# IDL “CM’s” for WILDFIRE THREAT

- WILDLAND FIRE PREVENTION & PROTECTION
  - Continued support for Rangeland Fire Protection Associations (RFPA’s)
- WILDLAND FIRE SUPPRESSION
- FUELS MANAGEMENT
  - Strategic fuel breaks
  - Interagency cooperation
  - Targeted grazing
- POST-FIRE RESTORATION
  - Emphasis on Interagency Partnership Projects



# WILDFIRE PREPAREDNESS & PREVENTION

- Rangeland Fire Protection Associations (RFPAs)
- Rural fire districts
- Burn Permits
- Idaho Fire Restrictions Plan

Draft Plan Pages 19-20

# Rangeland Fire Protection Associations

- Brief History
- Liability Insurance, Training, Radios, Personal Protective Equipment, additional Firefighting Equipment
- 2012 – Mountain Home RFPA
- 2013 – 4 RFPAs participated in 32 fires
- 2014 – 5 RFPAs participated in 20 fires
- 2015 – 6 RFPAs
- 2016 – projected 8 RFPAs



# WILDFIRE SUPPRESSION

None of IDL's fire districts  
have suppression  
responsibilities within  
identified Core or  
Important Habitat Zones

Extended attack fires  
involving state endowment  
trust rangelands, IDL may  
assign a Resource Advisor

Draft Plan Pages 7-8



Photo Credit: USFS, 2013 Pony/Elk Complex

# FUEL MANAGEMENT

## DESIGN

- Strategically protect existing CHZ and IHZ
- Modify fire behavior across landscapes
- Use proper livestock management & targeted grazing to reduce fuels and annual grass densities

## TREATMENTS

- Prescribed fire
- Mechanical
- Chemical
- Biological
- Targeted grazing

Draft Plan Pages 8-9

# INTERAGENCY COOPERATIVE PROJECTS

## Strategic Fuel Breaks

Tri-State Interagency Fuel Break Project

Paradigm Fuel Break Project

## Juniper Removal

Bruneau-Owyhee Sage-grouse Habitat Project

Burley Landscape SG Habitat  
Restoration Project

## Post Fire Restoration

BLM/IDFG/IDL Rangeland Rehabilitation MOU

# Trust Land Conservation Measures Endowment Leasing Programs

- Mineral Leases
- Oil & Gas Leases
- Alternative Energy – Geothermal & Solar Leases
- Surface Leases
- Grazing Leases
- Recreation Leases
- Rights-of-Way / Easements

Draft Plan Pages 11-17

# Trust Land Conservation Measures as Endowment Land Lease Stipulations Categories:

- General Surface Use and Timing
- Water Supply Structures
- Constructed Improvements
- Site Reclamation
- Weed Management
- Fire Prevention
- Noise
- Fencing
- Roads + Traffic

Draft Plan Pages 7,11-17

# Mining Non-Regulatory BMPs

- Voluntary measures incorporated into approvals
- Uses Other Applicable Measures: Fire, Invasive Species, Fencing, Infrastructure
- 0.6 mile Lek Buffers
- No Entry in Buffers March 15 to May 1
- Native Shrubs and Forbs in Reveg
- Mitigation for unavoidable impacts

Draft Plan Pages 19-20, 28-32



# Abandoned Mine Lands Service Program BMPs

- Voluntary participation by landowners
- IDL controls projects and contracts
- BMPs related to Fire, Invasive Species, Fencing, Infrastructure easily incorporated into projects
- 0.6 mile Lek Buffers
- Seasonal Restrictions
- Native Shrubs and Forbs in Revegetation

Draft Plan Pages 25-28

# Fluid Minerals

## Oil and Natural Gas Non-Regulatory BMPs

- Noise on permitted well sites will be at or below 65db
- 0.6 mile Lek Buffers for all operations including drilling, seismic and permanent pumping /compression stations



Draft Plan Pages 19-25

# Fluid Minerals

## Oil and Natural Gas Non-Regulatory BMPs



- Uses Other Applicable Measures: Fire, Invasive Species, Fencing, Infrastructure
- Seasonal construction stipulations from March to July
- Restricted pipeline maintenance from 6 a.m. to 8 a.m.

Draft Plan Pages 21-25

# Funding

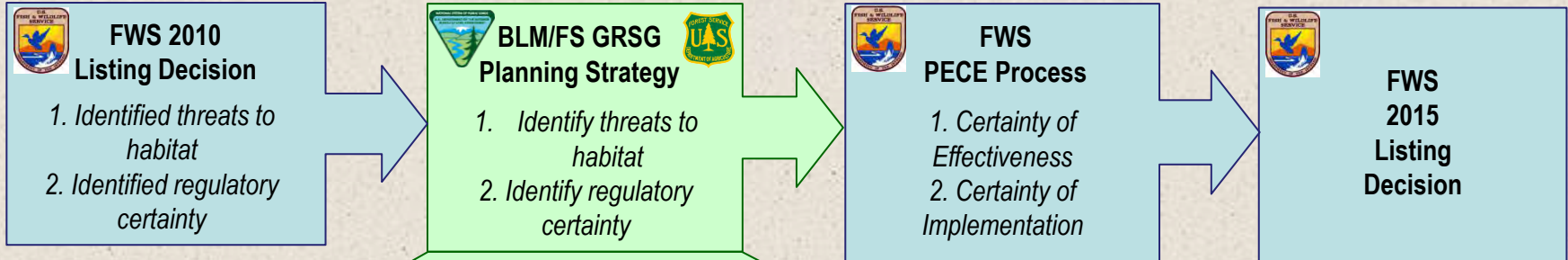
- Governor's FY 2016 Budget Recommendation- \$750,000
- \$250,000 to IDL
  - \$55K for RFPA equipment refurbish
  - \$195K for coop fuel break implementation
- \$500,000 for OSC
  - Spring lek surveys
  - RFPA funding
  - Private Lands Coordination/Cooperative Proj.

# Next Steps

- Stakeholder outreach
- News Release Tuesday Feb. 17
- Comments due Monday March 2
- Land Board approval March 17
- Oil and Gas Conservation Comm. approval  
March 19

QUESTIONS ?

# From Threats & Uncertainty...to Amelioration of Threats & Certainty



IDMT\_PUB\_0068  
5.1  
03/06/2013

## Consistency Framework

*Common Indicators & Metrics (GRSG 8)*

**Cumulative Effects Analysis (7-1)**

**Habitat Disturbance Measures (7-2)**

**Monitoring Framework (7-3)**

**Mitigation Framework (7-4)**

**Adaptive Management Framework (7-4)**

*All of these will contribute to:*

**Certainty of Implementation & Certainty of Effectiveness**

*at a biologically meaningful scale*



## BLM Greater Sage-Grouse Planning Proposed Alternatives Summary Table

Plan Name and Location (if blue click on title for website link)	BLM Field Offices/ Forest Service Forest Addressed	Describe the range of alternatives considered with a brief summary of what they address.					
		How were these alternatives developed (e.g., NTT alternative, citizen's proposed conservation alternative, Governor's Task Force alternative)? What is the geographic extent of each alternative (e.g., does the alternative consider measures in PPH only, PPH and PGH, or all occupied habitat?)					
		No Action Alternative	Alternative B	Alternative C	Alternative D	Alternative E	Alternative F
<a href="#">California and Nevada:</a>  <a href="#">Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Planning Strategy EIS</a>	<i>BLM Nevada:</i> Tonopah FO; Mt. Lewis FO; Black Rock Desert NCA; Sierra Front FO; Stillwater FO; Tuscarora FO, Wells FO; Egan FO; Schell FO, Caliente FO; Black Rock FO; Humboldt FO	Compilation of all existing plans in occupied habitat.  0 acres PPH 0 acres PGH	NTT Report applied to Categories 1 and 2 (PPH) and Category 3 (PGH) Habitat from NDOW.  <u>PPH</u> 10,471,270 acres BLM; 1,171,625 acres USFS	Environmental Citizen Group 1 (WWP).  Resource Use restrictions applied to all Occupied Habitat and potential ACECs.  Includes No Grazing in greater sage grouse occupied habitat	Sub-Regional adjustments to PPH and PGH based on management uses and biology.  <u>PPH</u> 10,607,435 acres BLM; 1,171,625 acres USFS  <u>PGH</u> 4,008,476 acres BLM; 533,394 acres USFS	Governor's Alternative  Nevada only. Does not apply to lands within State of California. California does not propose a Governor's Alternative  Manage 4 categories of habitat through Sage Grouse Management Areas (SGMAs): Occupied Habitat; Suitable Habitat; Potential Habitat; Non-habitat. Acres of each category TBD by the State.  SGMAs: Total acres TBD.	Environmental Citizen Group 2 (WEG).  NTT Report 'Plus' applied to all PPH, PGH and Restoration habitat (PRH).  Includes a proposed reduced grazing approach.
	<i>BLM California:</i> Alturas FO; Eagle Lake FO; Surprise FO  <i>Forest Service (all in Nevada):</i> Humboldt National Forest; Toiyabe National Forest	BLM and FS	<u>PGH</u> 4,144,641 acres BLM; 533,394 acres USFS  Total: <u>PPH</u> 11,642,895 acres <u>PGH</u> 4,678,035 acres  BLM and USFS	Occupied Habitat (OH = PPH + PGH): 16,330,920 acres  17 proposed "Super PMU" ACECs (PPH only per GRSG-5)  <u>PPH</u> 11,351,480 acres BLM <u>PPH</u> 1,180,548 acres USFS Total 12,532,028 acres  Potential RNAs not yet evaluated.  BLM and USFS	Net change is +232,480 acres PGH to Proposed PH. Net change is +96,315 acres PPH to Proposed GH.  11 Agency-nominated ACECs, totaling 936,045 acres of public lands in CA and NV.  In addition, six (6) Agency-nominated ACECs were received through scoping for	+232,480 acres PGH to Proposed PH. Net change is +96,315 acres PPH to Proposed GH.  11 Agency-nominated ACECs, totaling 936,045 acres of public lands in CA and NV.  In addition, six (6) Agency-nominated ACECs were received through scoping for	SGMA: Total acres TBD.  <u>PPH</u> : 9,593,972 acres BLM; 1,066,590 acres FS  <u>PGH</u> : 1,994,806 acres BLM; 303,946 acres FS



					<p>BMDO RMP Revision, totaling 1,014,810 acres. [Note: These nominations were received prior to the GRSG effort and are currently being addressed in the BMDO RMP revision].</p> <p>BLM and USFS</p>		<p>System of ACECs consists of 34 Proposed ACECs (as currently configured by PMU boundaries.) 9,442,904 acres BLM; 552,196 acres USFS</p> <p><u>Total</u> 10,319,185 acres BLM and USFS</p>
<p><b>Idaho:</b></p> <p><a href="#">Idaho and Southwestern Montana Sub-Regional Greater Sage-Grouse Planning Strategy EIS</a></p>	<p><i>BLM Idaho:</i> Birds of Prey NCA; Bruneau FO; Challis FO; Craters of the Moon NM; Four Rivers FO; Jarbidge FO; Salmon FO; Owyhee FO; Pocatello FO; Shoshone FO; Burley FO; Upper Snake FO</p> <p><i>BLM Montana:</i> Dillon FO</p> <p><i>Forest Service Idaho:</i> Boise National Forest; Salman-Challis National Forest; Targhee, Curlew National Grasslands; Caribou National Forest; Sawtooth (including a small portion in Utah)</p> <p><i>Forest Service Montana:</i> Beaverhead-Deerlodge National Forest</p>	<p>Compilation of all existing plans in occupied habitat. No PPH or PGH identified. Includes 53 existing ACECs containing 325 thousand acres of PPH.</p> <p>BLM and FS</p>	<p>NTT Report applied to BLM identified and refined PPH and PGH as of April 2012 (Version 2 Map). Does not designate new ACECs.</p> <p>BLM and FS</p>	<p>Environmental Citizen Groups (C-1 – primarily Western Watersheds Project) based alternative + NTT Report ‘Plus’ applied to all occupied habitat and potentially other areas. This is all PPH and PGH as displayed on the April 2012 Map. (PPH + PGH = All occupied habitats in Idaho and southwestern Montana). Includes ‘no grazing’ approach. Designates 39 new ACECs encompassing approximately 4.2 million acres of PPH.</p> <p>BLM and FS</p>	<p>Sub-Regional adjustments alternative (PPH and PGH) ID/swMT Team is developing a somewhat refined PPH/PGH map for use in this alternative. Dillon Field Office will continue current management direction as described in the Dillon RMP with additional management actions responding to issues and NTT consistency. Includes a targeted grazing approach. Does not designate new ACECs.</p> <p>BLM and FS</p>	<p>Governor’s Alternative Based on April 2012 PPH and PGH and further refined to reflect state delineations of Core, Important and General areas. No Governor’s Alternative in Montana; however, existing management in the Dillon RMP was developed through coordination between BLM/FS and Montana Fish Wildlife and Parks. Does not designate new ACECs.</p> <p>BLM and FS</p>	<p>Environmental Citizen Group (C-2 – primarily Wild Earth Guardians) based alternative + NTT Report ‘Plus’ split into PPH and PGH and potentially other areas. Includes a reduced grazing approach. Designates up to 17 new ACECs totaling up to 11.5 million acres of PPH.</p> <p>BLM and FS</p>
<p><b>Oregon:</b></p>	<p><i>BLM Oregon:</i> Deschutes FO; Central</p>	<p>Compilation of all existing plans in</p>	<p>NTT Report applied to Governor’s</p>	<p>Environmental Citizen Groups</p>	<p>Sub-Regional adjustments</p>	<p>Governor’s (ODFW) Alternative</p>	

<p><a href="#">Oregon Sub-Regional Greater Sage-Grouse Planning Strategy EIS</a></p>	<p>Oregon FO; Steens Mtn. NCA; Andrews FO; Three Rivers FO; Lakeview FO; Malheur FO; Jordan FO; Baker FO <i>Forest Service:</i> None</p>	<p>occupied habitat. No PPH or PGH identified. Includes 95 existing ACECs encompassing ~205,600 acres of PPH and ~258,500 acres of PGH.</p>	<p>identified CORE habitat (PPH) Does not designate new ACECs.</p>	<p>based alternative + NTT Report 'Plus' applied to all occupied habitat.</p> <p><b><u>C1</u></b> Based primarily on Western Watersheds Project No livestock grazing within occupied habitat. All PPH as ACECs encompassing approximately 4.5 million acres.</p> <p><b><u>C2</u></b> Based primarily on Wild Earth Guardians Includes a reduced grazing approach. Designates 19 new ACECs totaling approximately ___ million acres of PPH.</p>	<p>alternative (includes actions addressing both PPH and PGH). Draws from the NTT and Governor's (ODFW) alternative while also making adjustments to best meet OR BLM's challenges and opportunities for conserving GRSG habitat. Includes a targeted grazing approach. Does not designate new ACECs.</p>	<p>CORE Habitat plus Low Density Habitat (PPH/PGH in part) Based on the 2011 Greater Sage-Grouse Conservation Assessment and Strategy for Oregon.</p> <p>Does not designate new ACECs.</p>	
<p><b>Utah:</b></p> <p><a href="#">Utah Sub-Regional Greater Sage-Grouse Planning Strategy EIS</a></p>	<p><i>BLM Utah:</i> Vernal FO; Price FO; Richfield FO; Kanab FO; GSENM; Cedar City FO; Fillmore FO; Salt Lake FO <i>Forest Service:</i> Ashley National Forest; Manti-LaSal National Forest; Fishlake National Forest; Dixie National Forest; Uintah National Forest; Wasatch-Cache National Forest (A small portion of the Ashley and Wasatch-</p>	<p>Compilation of all existing plans in occupied habitat. No PH or GH identified.</p> <p>BLM and FS</p>	<p>NTT Report applied to alignment of Proposed PH/GH, with several areas proposed as GH for analytical purposes.</p> <p>BLM and FS</p> <p>Does not designate new ACECs</p>	<p>Environmental Citizen Groups based alternative + NTT Report 'Plus' applied to all occupied habitat.</p> <p>12 new sage-grouse ACECs (1,845,800 acres) would be designated encompassing nearly 74% of BLM-administered occupied habitat.</p> <p>BLM and FS</p>	<p>Sub-Regional adjustments alternative (PPH and PGH) ID Team is developing a somewhat refined PPH/PGH map for use in this alternative.</p> <p>Does not designate new ACECs.</p> <p>BLM and FS</p>	<p><b><u>E1</u></b> Utah Governor's Alternative; Integration of State of Utah Strategic Sage-Grouse Plan.</p> <p>Uses State's Sage-Grouse Management Areas as an equivalent for priority habitat. Occupied habitat beyond these areas would receive no specific management.</p> <p>BLM and FS</p>	

	<p>Cache NF fall in Wyoming, but will be planned for in the Utah Sub-regional plan.)</p>			<p><b><u>C1</u></b> No livestock grazing within occupied habitat.</p> <p><b><u>C2</u></b> Reduction in livestock grazing AUMs.</p>		<p><b><u>E2</u></b> Wyoming Governor's Alternative. FS lands in WY only.</p> <p>Includes elements from WY Governors EO 2010-4 and NTT measures in specific program areas not addressed in earlier directives.</p> <p>The focus is to consider the Governor's EO.</p> <p>WGF Core and occupied habitat maps.</p>	
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Chartered Great Basin Regional Management Team Members

Idaho/SW Montana

BLM: Steve Ellis  
Jamie Connell  
(Brent Ralston – Project Lead)  
State: Jeff Gould (ID)  
Dustin Miller (ID)  
Dave Risley (MT)

Oregon

BLM: Jerry Perez  
(Lauren Pidot for Joan Suther – Project Lead)  
State: Roy Elicker

Nevada/NE California

BLM: Amy Lueders  
Jim Kenna (Nancy Haug)  
Raul Morales  
Lauren Mermejo  
(Brian Amme – Project Lead)  
State: Dr. Erik Loft (CA)  
Ken Mayer (NV)  
Leo Drozdoff (NV)  
NRCS: Bruce Petersen

Utah

BLM: Juan Palma  
(Quincy Bahr – Project Lead)  
State: John Harja  
Alan Clark

USFWS

Pat Deibert; Jessie Delia; Ren Lohofener; Robyn Thorson

Forest Service

Glen Stein; Marlene Finley

WO Solicitor's Office

Sarah Shattuck

WO BLM

Ed Roberson; Jessica Rubado

Rocky Mtn. Region

Johanna Munson

NIFC

Tim Murphy

NOC

Roxanne Falise



### ***ROW - Relevant Regulations***

For ROW grants issued under the authority of the Mineral Leasing Act (MLA), the regulations found at 43 CFR 2887.12 address renewals. Regulations found at 43 CFR 2887.12(a) state that “...BLM will renew your grant if the pipeline is being operated and maintained in accordance with the grant, these regulations, and the Act.” (underline added)

For ROW grants issued under the authority of Title V of the Federal Land Policy and Management Act (FLPMA), the regulations found at 43 CFR 2807.22 address renewals. Regulations found at 43 CFR 2807.22(a) state that “If your grant specifies that it is renewable,...BLM will renew the grant if you are complying with the terms, conditions, and stipulations of the grant and applicable laws and regulations.” (underline added)

Regulations found at 43 CFR 2807.22(b) state that, “if your grant does not address whether it is renewable, you may apply to the BLM to renew your grant...In your application you must show that you are complying with the terms, conditions, and stipulations of the grant and applicable laws and regulations. BLM has the discretion to renew the grant if doing so is in the public interest.” (underline added)

### ***Conclusions***

So, assuming that the ROW is being operated in accordance with the grant (including stipulations and terms and conditions), the regulations, and applicable laws:

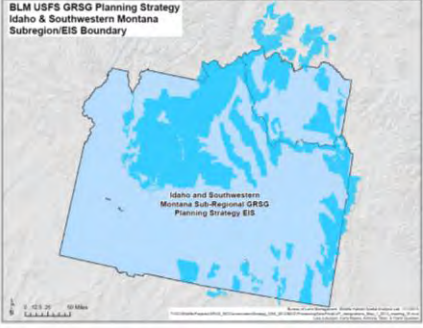
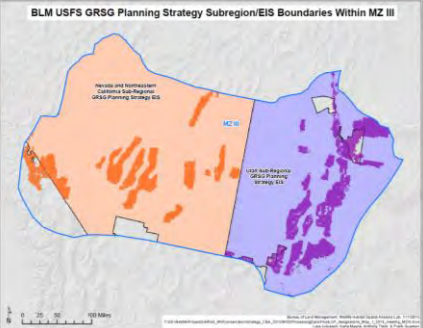
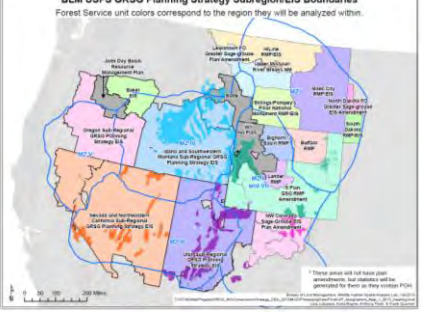
- BLM must renew ROW grants issued under the authority of MLA (always) and those issued under the authority of FLPMA (if the ROW grant indicates it is renewable), even if the planning designation has changed to a ROW exclusion or avoidance area.
- For ROW grants issued under the authority of the FLPMA that do not address whether they are renewable, the BLM has discretion to renew the authorization, if doing so is in the public interest.

I would recommend that the ROW exclusion/avoidance area may be a factor considered when weighing the public interest, but that it does not preclude the renewal since the ROW is a valid existing right. I recommend that when considering the public interest, the Authorized Officer should also consider the investment in the facility (the dollar value and how that investment was funded – public/private) and the population being served by the facility (public benefit), in addition to other relevant factors. It is often not in the public interest to deny the renewal and require removal of the associated infrastructure.

ROW grants issued under authorities other than MLA and FLPMA, should be renewed (which may involve issuing a new authorization under the authority of the FLPMA) as long as the ROW is being operated in accordance with the grant (including terms and conditions and stipulations), the regulations and applicable laws, and if doing so would not be inconsistent with the enabling authority. Since the specific authority that the ROW was granted under will affect the rights that were granted to the Holder, if an Authorized Officer is considering not renewing one of these grants they should consult the Solicitor’s Office for advice/assistance to ensure that the BLM is not diminishing the rights that were originally granted.

Note that in all cases, the BLM has the discretion to modify the terms, conditions, and/or stipulations of the ROW grant as a condition of the renewal (43 CFR 2807.22(c) & 2887.12(b)). So the Authorized Officer may determine that additional measures are needed to protect the resources that triggered the exclusion or avoidance designation and generally these measures will be related to minimizing impacts that result from the operation and maintenance of the authorized facility (ex. speed limits along ROWs, weed control within ROW, etc.).

# Three-tiered approach to a Cumulative Effects Analysis under the GRSG Consistency Framework

Scale	Who is responsible?	What data are needed?	What is included?	What will it be called?	When will this be done?	Why?
<p>Subregion/EIS (n = 17)</p>  <p>BLM USFS GRSG Planning Strategy Idaho &amp; Southwestern Montana Subregion/EIS Boundary</p> <p>Idaho and Southwestern Montana Sub-Regional GRSG Planning Strategy EIS</p>	<p>Subregion/EIS Planning Lead, ID Teams, BLM SO GIS Lead &amp; FS GIS Lead, and potential contractor support</p>	<p>Planning unit-level data using Baseline Environmental Report and indicators that were included in Ch 3, including GIS data depicting management decisions in plans.</p>	<p>All BLM/FS Programs will need to complete a CEA as you typically would for an RMP that addresses the effects for all programs</p>	<p>Subregion/EIS Cumulative Effects Analysis</p>	<p>Draft EIS</p>	<p>Each individual plan will need to complete a CEA to show the effects of the management decisions under the alternatives to all of the affected programs within the planning unit, <i>including biological CEA for GRSG within the Subregional boundary.</i></p>
<p>GRSG WAFWA Management Zone (n = 5)</p>  <p>BLM USFS GRSG Planning Strategy Subregion/EIS Boundaries Within MZ III</p>	<p>Subregion/EIS Planning Lead, Regional Planning Coordinators, CEA Team, Data Management Team, NOC, and potential contractor support</p>	<p>Common data (e.g. from Baseline Environmental Report), depicting management decisions in plan and including known information from non BLM/FS lands.</p>	<p>Cumulative Effects to GRSG in the Proposed Plan alternative only at the WAFWA Management Zone.</p>	<p>WAFWA Management Zone Cumulative Effects Analysis (CEA)</p>	<p>Initiated after comments have been received for the drafts; finalized prior to release of Proposed RMP (for all plans within a WAFWA MZ)</p>	<p>To report the biological cumulative effects to GRSG at a biologically meaningful scale (WAFWA GRSG Management Zones). It will be done at this scale so that the data can be rolled up for the Landscape Report.</p>
<p>Range-wide(all MZs; n = 1)</p>  <p>BLM USFS GRSG Planning Strategy Subregion/EIS Boundaries Forest Service unit colors correspond to the region they will be analyzed within.</p>	<p>CEA Team, Data Management Team, Regional Planning Coordinators, NOC, and potential contractor support</p>	<p>Common data (e.g. from Baseline Environmental Report), depicting management decisions in BLM/FS plans.</p>	<p>Effects to GRSG only based on decisions in the RODs.</p>	<p>GRSG Landscape Report</p>	<p>Initiated after the Final EISs; finalized after all of the RODs are released</p>	<p>To give FWS one document that describes how all of our plans will affect GRSG. BLM/FS will provide a Landscape Report CEA across the entire range of the species.</p>



**Jonathan Hayden**

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**From:** Mermejo, Lauren <lmermejo@blm.gov>  
**Sent:** Thursday, August 13, 2015 5:48 PM  
**To:** nvca sagegrouse  
**Subject:** Fwd: MZ 4 CEA  
**Attachments:** Excerpts from the RFD Scenario of Oil and Gas\_NV\_CEA review for MZ IV.docx;  
CEA\_IDMT\_all merge.docx

----- Forwarded message -----

**From:** Beck, Jonathan <jmbeck@blm.gov>  
**Date:** Thu, Apr 2, 2015 at 2:23 PM  
**Subject:** MZ 4 CEA  
**To:** Drew V <drew.vankat@empssi.com>  
**Cc:** Meredith Zaccherio <meredith.zaccherio@empssi.com>, Lauren Mermejo <lmermejo@blm.gov>

Drew attached is the MZ 4 CEA merged comments document. This includes comments from me, Lauren, Jenny, and Randall Sharp. Randal also included information from the NV RFD. Also, here is a link to the Four Rivers oil and gas leasing EA that discusses future gas development In Idaho: <https://www.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=39064&detmId=0b0003e8806d22d8>

I will send the FS comments when I receive them. Jon

--  
Jonathan Beck  
Bureau of Land Management  
Idaho State Office  
208-373-4070

--  
Lauren L. Mermejo  
Great Basin Greater Sage-Grouse Project Mgr.  
BLM, Nevada State Office  
775 861-6580

**Excerpts from the RFD Scenario of Oil and Gas  
NV subregion  
Elko Area**

**Table R-8 Oil and Gas Wells (Exploration & Production) Projections for the Decision Area (DA) and Elko-Noble Area (Elko)**

Alternative	Oil Wells Expected to be Drilled					Oil Wells Expected to be Producing				
	On Existing Leases		On New Leases		Total	On Existing Leases		On New Leases		Total
	DA	Elko	DA	Elko		DA	Elko	DA	Elko	
A	15	60	25	0	100	3	33	5	0	41
B	12	40	20	0	72	2	22	4	0	28
C	10	20	18	0	48	2	11	3	0	16
D	11	24	19	0	54	2	13	4	0	19
E	13	51	21	0	85	2	28	4	0	34
F	10	20	18	0	48	2	11	3	0	16
PP	14	45	19	0	78	3	9	4	0	16

**Table L-4 Reasonably Foreseeable Disturbance from Oil & Gas Exploration within the Decision Area (DA) and Elko-Noble**

	Alt A		Alt B		Alt C		Alt D		Alt E		Alt F		Proposed Plan	
Activity:	Disturbances													
RFD Areas	Elko	DA	Elko	DA	Elko	DA	Elko	DA	Elko	DA	Elko	DA	Elko	DA
# of new wells	60	40	40	32	20	28	24	30	51	34	20	28	45	33
Seismic Surveys (ac)	-	606	-	485	-	436	-	455	-	515	-	436	-	497
Roads (acres)	180	480	120	384	60	346	72	360	153	408	59	346	135	394
Well Pads (ac)	60	160	48	128	20	115	24	120	51	136	20	115	45	131
<b>Total Acres:</b>	<b>240</b>	<b>1246</b>	<b>168</b>	<b>997</b>	<b>80</b>	<b>897</b>	<b>96</b>	<b>935</b>	<b>204</b>	<b>1059</b>	<b>79</b>	<b>897</b>	<b>180</b>	<b>1022</b>
Reduction By %	0%	0%	33%	20%	67%	28%	60%	25%	15%	15%	67%	28%	25%	18%

(DA = Decision Area minus Elko-Noble Areas)



5.1 **GREATER SAGE-GROUSE CUMULATIVE EFFECTS ANALYSIS: [BUFFALO FIELD OFFICE](#)  
[IDAHO SOUTHWEST MONTANA](#)**

Commented [JMM1]: Copy and paste error?

This cumulative effects analysis (CEA) discloses the long-term effects on Greater Sage-Grouse (GRSG) from implementing each RMP/EIS alternative, in conjunction with other past, present, and reasonably foreseeable future actions.

The cumulative effects analysis study area extends beyond the Idaho and southwestern Montana sub-region boundary and consists of Western Association of Fish and Wildlife Agencies (WAFWA) Management Zones (MZ) IV and II/VII. MZ II and VII are combined for the purpose of characterizing GRSG habitat conditions and impacts, as was done in the Summary of Science, Activities, Programs, and Policies That Influence the Range-Wide Conservation of Greater Sage-Grouse (Manier et al. 2013). However, the Idaho and southwestern Montana sub-region contains a portion of MZ II and does not overlap with MZ VII. The analysis of BLM and Forest Service actions in MZs IV and II/VII is primarily based on MZ-wide datasets developed by the BLM National Operations Center (NOC).

The analysis of nonfederal actions is more qualitative and includes a review and analysis of the following:

- State plans
- Coordination with states and agencies during consistency reviews
- Additional data from non-BLM-administered lands.

**Figure 5-1** shows the boundaries of the WAFWA Management Zones and the BLM and Forest Service planning areas. The Idaho and southwestern Montana sub-region contains a large proportion of MZ IV, with 11,827,900 acres of PHMA out of 22,105,600 total acres in MZ IV; and 5,635,700 acres of GHMA out of 10,128,500 total acres in MZ IV. In contrast, the Idaho and southwestern Montana sub-region has a relatively small influence in the context of MZ II/VII, because it contains relatively few priority habitat management areas (PHMA) or general habitat management areas (GHMA; 147,100 acres of PHMA out of 14,105,000 total acres in MZs II/VII; and 23,600 acres of GHMA out of 17,771,500 total acres in MZs II/VII). As a result, actions in the Idaho and southwestern Montana LUPA/EIS may have less impact on GRSG than those in larger planning areas in MZs II/VII.

In addition, the MZ IV contains 4,198,900 acres of the Southern Idaho/Northern Nevada Sagebrush Focal Area (SFAs), and MZs II/VII contain 563,300 acres of the Bear River Watershed Area SFA. SFAs are a subset of PHMA and represent recognized "strongholds" for the species that have been noted and referenced by the conservation community as having the highest densities of the species and other criteria important for the persistence of the species. Those portions of SFAs on BLM-administered and National Forest System lands would be petitioned for withdrawal from mineral entry; subject to an NSO stipulation

with no exceptions, modifications, or waivers; and are prioritized for management and conservation actions, including but not limited to, review of livestock grazing permits/leases. Management of SFAs would enhance protection of GRSG in these areas, providing a net conservation gain to the species in light of other past, present, and reasonably foreseeable future actions considered in this CEA.

**Section 5.1.1**, Methods, provides a description of the methodology used for this cumulative effects analysis. **Section 5.1.2** lists assumptions used in the analysis. **Section 5.1.3** describes existing conditions in WAFWA MZ IV and in the Idaho and southwestern Montana sub-region. **Section 5.1.4**, provides a broad-scale description regional efforts to manage GRSG in MZ IV. **Section 5.1.5** discusses the relevant cumulative actions in MZ IV that will be analyzed in this CEA. **Section 5.1.6** analyzes threats to GRSG in MZ IV and discusses the potential cumulative effects resulting from each threat for each alternative. **Section 5.1.7** describes existing conditions in WAFWA MZs II/VII. **Section 5.1.8**, provides a broad-scale description regional efforts to manage GRSG in MZs II/VII. **Section 5.1.9** discusses the relevant cumulative actions in MZs II/VII that will be analyzed in this CEA. **Section 5.1.10** analyzes threats to GRSG in MZs II/VII and discusses the potential cumulative effects resulting from each threat for each alternative. **Section 5.1.11**, Conclusions, determines the cumulative effects on GRSG as a result of implementing each alternative in combination with other private, local, regional, state, and federal past, present, and reasonably foreseeable future actions in MZs IV and II/VII.

#### **5.1.1 Methods**

The CEA uses the following methods:

- Data from the USGS publication Summary of Science, Activities, Programs, and Policies That Influence the Range-Wide Conservation of Greater Sage-Grouse (Manier et al. 2013) establishes the reference condition against which the alternatives and other past, present, and reasonably foreseeable future actions are compared.
- The USFWS's 12-Month Findings for Petitions to List the Greater Sage-Grouse (*Centrocercus urophasianus*) as Threatened or Endangered" (USFWS 2010) and the USFWS publication Conservation Objectives: Final Report (i.e., the COT report; USFWS 2013) were reviewed to identify the primary threats facing GRSG in each WAFWA MZ. Table 2 of the COT report lists threats to GRSG that are present and widespread in each population in the MZ.
- For MZ IV the list of present and widespread threats that are directly or indirectly affected by BLM and Forest Service actions are fire, spread of weeds, conifers, infrastructure, grazing/free-roaming equids, conversion to agriculture, energy development/mining, and recreation (USFWS 2013, pp. 22-24). For MZ II/VII, these threats include: energy

development/mining, infrastructure, grazing, conversion to agriculture, fire, spread of weeds, recreation, and conifers (USFWS 2013, pp. 17-19, 27-28). Two other threats listed in the COT report, sagebrush eradication and isolation/small population size, affect GRSG populations in MZs IV and II/VII. While they are not addressed separately in this analysis, they are discussed as elements of other threats.

- Predation was not included as a threat in the final COT report and was not identified by USFWS as a significant threat to GRSG populations (USFWS 2010). Predation is a natural occurrence that may be enhanced by human habitat modifications such as construction of infrastructure that may increase opportunities for nesting and perching or increase exposure of GRSG nests. In such altered habitats, predators may exert an undue influence on GRSG populations. Predation is discussed in this CEA in the context of these other threats.
- Sagebrush eradication is a component of many threats, while isolation/small population size is not analyzed separately because no management actions directly address this threat. These two threats are discussed as a component of other threats and in the conclusions. Not all the threats discussed in this section represent major threats to GRSG in each planning area in the MZs, but each poses a present and widespread threat to at least one population.
- Each threat is analyzed (quantitatively when possible), and a brief conclusion for each threat is provided.
  - The BLM NOC compiled MZ-wide datasets for quantifiable actions in all LUPA/EISs in MZs IV and II/VII. These datasets provide a means by which to quantify direct impacts of the threats identified in the COT report.
  - Data and information were gathered from other federal, state, and local agencies and tribal governments, where available, and were used to inform the analysis of cumulative impacts on GRSG from each of the threats in MZs IV and II/VII. Because of the lack of consistent non-BLM and non-Forest Service data across the MZ, this portion of the analysis is qualitative.
- A conclusion is provided for each alternative in **Section 5.1.11**. Each alternative considers the cumulative impacts on GRSG from each of the threats. It also considers whether those threats can be ameliorated by implementing that particular alternative in conjunction with non-BLM and non-Forest Service actions in MZs IV and II/VII.
- The list of relevant cumulative actions in **Sections 5.1.5** and **5.1.9** was derived from each LUPA in MZs IV and II/VII to provide an overview of the ongoing and proposed land uses there.

**Commented [jmbeck2]:** This is a confusing sentence. I think there are two thoughts that should be explained a little better.

- Baseline data that are consistent across planning areas and that analyze cumulative effects for each alternative, including the no action alternative and Proposed Plan, are used in this analysis.
- The Idaho and southwestern Montana sub-region is located within two MZs. In this instance, the CEA analyzes threats and impacts for each MZ separately.
- This analysis uses the most recent information available. It assumes that the Proposed Plan will be implemented in the other BLM and Forest Service sub-regions in MZs IV and II/VII.

### 5.1.2 Assumptions

This cumulative analysis uses the same assumptions and indicators as those established for the analysis of direct and indirect effects on GRSG in **Section 4.4.9**. In addition, the following assumptions have been made:

- The timeframe for this analysis is 10 years.
- The CEA area extends beyond the sub-region boundary and encompasses all of WAFWA MZ IV and II/VII; the quantitative impact analysis focuses on impacts across the MZs.
- The magnitude of each threat would vary geographically and may have more or less impact on GRSG in some parts of the MZs, depending on such factors as climate, land use patterns, and topography.
- A management action or alternative would contribute a net conservation gain to GRSG if there is an actual benefit or gain above baseline conditions. Baseline conditions are defined as the pre-existing condition of a defined area and/or resource that can be quantified by an appropriate metric(s). During environmental reviews, the baseline is considered the affected environment that exists at the time of the review's initiation, and is used to compare predictions of the effects of the proposed action or a reasonable range of alternatives.
- The CEA quantitatively analyzes GRSG habitat. Impacts on habitat are likely to correspond to impacts on populations within the MZs, since reductions or alterations in habitat could affect reproductive success through reductions in available forage or nest sites. Human activity could cause disturbance to the birds, preventing them from mating or successfully rearing offspring. Human activities also could increase opportunities for predation, disease, or other stressors (Connelly et al. 2004; USFWS 2010; Manier et al. 2013).
- The governor of Idaho is expected to issue an executive order providing direction for GRSG conservation in Idaho on state lands. This executive order is expected to be largely consistent with BLM and

Forest Service direction, though exact details are not known at the time this FEIS is published.

- Acres presented for GHMA also include acres within IHMA.

**Commented [JMM3]:** This is not previously defined. Is this a typo for GHMA or is the I for Idaho?

**5.1.3 Existing Conditions in WAFWA MZ IV and the Idaho and Southwestern Montana Sub-region**

This section summarizes existing conditions and past and present actions for the Idaho and southwestern Montana sub-region (provided in more detail in Chapter 3) and for MZ IV as a whole.

*GRSG Habitat and Populations*

MZ IV consists of nine GRSG populations: Baker, East-Central, Southwest Montana, Snake-Salmon-Beaverhead, Belt Mountains, Weiser, Northern Great Basin, Box Elder, and Sawtooth (Garton et al. 2011). The sub-region includes six of these populations: East-Central, Southwest Montana, Snake-Salmon-Beaverhead, Weiser, Northern Great Basin, and Sawtooth. This MZ represents one of the largest areas of connected GRSG habitat, as demonstrated by Knick et al. (2011), and supports the largest population of GRSG outside of the Wyoming Basin (Garton et al. 2011). MZ IV includes GRSG populations in Oregon, Idaho, Nevada, Utah and Montana.

In MZ IV, BLM-administered and other federal lands account for approximately 22,522,300 million acres of GRSG habitat (approximately 68 percent of habitat), with state and private lands accounting for over 10 million acres of GRSG habitat (approximately 31 percent of habitat) (Manier et al. 2013, p. 118). The BLM also has some management authority over split estate lands, with privately held surface and federal subsurface mineral rights. Approximately 21 percent of PHMA and 44 percent of GHMA within MZ IV are located on BLM-administered and National Forest System lands in the Idaho and southwest Montana sub-region.

Table 5-1 provides a breakdown of landownership and acres of GRSG habitat in MZ IV. As the table shows, approximately 52 percent of PPH-PHMA and 19 percent of PGHGHMA is on BLM-administered lands. Approximately 7 percent of PPHMAPPH and 5 percent of PGHMAPGH is on National Forest System lands.

**Table 5-1**  
**Management Jurisdiction in MZ IV by Acres of Priority and General Habitats**  
**(PPHMAPPH and PGHMAPGH)**

	Total Surface Area (Acres)	PPHMAPPH (Acres)	PGHMAPGH (Acres)	Non-habitat (Acres)
<b>MZ IV</b>	78,259,200 (100%)	21,930,600	10,958,500	45,370,100



**Table 5-1**  
**Management Jurisdiction in MZ IV by Acres of Priority and General Habitats**  
**(PPHMAPPH and PGHMAPGH)**

	<b>Total Surface Area (Acres)</b>	<b>PPHMAPPH (Acres)</b>	<b>PGHMAPGH (Acres)</b>	<b>Non-habitat (Acres)</b>
		(28%)	(14%)	(58%)
BLM	26,220,300 (34%)	13,710,700 (52%)	4,928,200 (19%)	7,581,400 (29%)
Forest Service	22,291,600 (28%)	1,613,800 (7%)	1,113,500 (5%)	9,564,300 (43%)
Tribal and other federal	2,431,000 (3%)	633,600 (26%)	522,500 (21%)	1,274,900 (52%)
Private	23,150,400 (30%)	4,890,200 (21%)	3,516,700 (15%)	14,743,500 (64%)
State	3,681,000 (5%)	1,019,400 (28%)	846,200 (23%)	1,815,400 (49%)
Other	484,800 (<1%)	62,900 (13%)	31,400 (6%)	390,500 (81%)

Source: Manier et al. 2013, p. 118

*Sub-region Habitat Conditions*

Sub-regional habitat conditions and trends are presented by population area in **Table 3-4**.

**Commented [jmbeck4]:** There is no Table 3-4 in this document. Is this referring to the EIS?

*Idaho and Southwestern Montana LUPA/EIS Alternatives*

The Idaho and Southwestern Montana LUPA and EIS evaluated the following seven alternatives:

- Alternative A, current management (the no action alternative)
- Alternative B, which was developed using GRSG conservation measures in A Report on National Greater Sage-Grouse Conservation Measures (Sage-Grouse National Technical Team 2011)
- Alternative C, which was developed based on recommendations from individuals and conservation groups for protecting and conserving GRSG and habitat rangewide
- Alternative D, which incorporates conservation measures to conserve, enhance, and restore GRSG habitat on BLM-administered and National Forest System lands, while balancing resources and resource use among competing human interests, land uses, and the conservation of natural and cultural resource values, and sustaining and enhancing ecological integrity across the landscape, including plant, wildlife, and fish habitat.
- Alternative E, which was developed from recommendations by the State of Idaho's GRSG Task Force
- Alternative F, which was derived from individual and conservation group comments. This alternative contains a mixture of management actions from A Report on National Greater Sage-Grouse Conservation Measures as well as additional restrictions on resource uses and increased resource protection; and
- Proposed Plan, which was developed through a coordinated partnership of BLM, Forest Service, the States of Idaho and Montana and the USFWS and is consistent with the objectives described in the COT report

*Population Trends in Management Zone IV*

Historic conversion of habitat to agriculture has resulted in a residual sagebrush landscape that is less productive than those prior to European colonization. As a result, more known GRSG populations in the region are relatively small and/or separated from adjacent populations. Notable exceptions are the Snake-Salmon-Beaverhead and Northern Great Basin populations (Manier et al. 2013, p. 132). Garton et al. (2011) predicted a 10.5 percent chance this MZ will fall below 200 males by 2037, and a 39.7 percent chance it would fall below 200 males by 2107 (USFWS 2013, p. 75).

While population estimates and trends for the sub-region are not available, GRSG populations are described in **Section 3.2**. The Snake-Salmon-Beaverhead and Northern Great Basin populations encompass the largest number of occupied leks in the sub-region. The Northern Great Basin population is especially important to long-term conservation of GRSG in MZ IV. This is because it comprises a substantial portion of the Great Basin core population (Connelly et al. 2004); shared with Nevada, Utah, and Oregon, this is one of the

**Commented [jmbeck5]:** Are we really talking about productivity or productivity and fragmentation. If we are including fragmentation, we should add in other factors such as fire, urbanization, weeds, invasive, etc.

**Commented [jmbeck6]:** 5.2?

two remaining major population strongholds in the range of the species. The Snake-Salmon-Beaverhead population provides additional and substantial population contributions within Idaho. It also provides known connectivity with the Southwest Montana population area.

In Montana, the GRSG population changes cyclically. The GRSG population declined sharply from 1991 to 1996, before increasing through 2000 (Montana Sage Grouse Work Group 2005). The population is thought to be down 33 percent from historic levels. Between 2004 and 2013, the average number of displaying males per lek in a given year in Montana ranged from 7 to 19 (Greater Sage-Grouse Habitat Conservation Strategy 2014).

#### 5.1.4 Regional Efforts to Manage Threats to GRSG in MZ IV

There are several regional efforts to manage threats to GRSG in MZ IV. Because state and private lands account for approximately 10 million acres (approximately 31 percent) of GRSG habitat in MZ IV (Manier et al. 2013, p. 118) these efforts play an important role in alleviating threats to GRSG.

##### Idaho Statewide Efforts

Similar to efforts in nearby states, the governor of Idaho is expected to issue an executive order providing direction for GRSG conservation in Idaho on state lands. This executive order is expected to be largely consistent with BLM and Forest Service direction, though exact details are not known at the time this FEIS is published.

##### Montana Statewide Efforts

The Montana Department of Fish, Wildlife and Parks (MFWP) is tasked with implementing the range-wide WAFWA Sage-Grouse Strategy (Stiver et al. 2006) in Montana. The WAFWA Sage-Grouse Strategy monitors, researches, provides outreach, and funds conservation projects for GRSG. A basic premise of the WAFWA Sage-Grouse Strategy is that additional conservation capacity must be developed at all local, state, federal, and range-wide levels for both the short term (3 to 5 years) and for the long term (10 years or more) to ensure GRSG conservation.

In addition, the MFWP's Montana Management Plan and Conservation Strategy for Sage-Grouse was initiated in 2005 to protect, maintain, and restore GRSG habitat. The plan ranks threats to the species across the state and provides an overall strategy for public and private cooperation in conservation actions. In 2013, the Greater Sage-Grouse Habitat Conservation Advisory Council provided a plan to the governor to update and advance the conservation agenda for GRSG in Montana. The governor issued an executive order on September 9, 2014 (State of Montana 2014), based on the council recommendations that provided the direction for GRSG conservation in Montana.

Montana Executive Order. The plan calls for the following:

**Commented [jimbeck7]:** Idaho is doing more than just an executive order. Idaho Department of Lands has just released a GRSG management plan. I'm not sure of the status. Paul Makela would know.

I also think IDFG has some management plans too.

What about the Idaho State Alternative? We discuss the NV alternative below but seem to be missing some Idaho efforts (IDL Plan, executive order, local working groups, IDFG plans, the gov.'s alternative). Makela could give you more.

**Commented [JMM8]:** Who is this group? Maybe there should be a clarifying sentence describing their mission / purpose?

- A 0.6-mile NSO buffer around active leks in Core Areas (0.25 mile in GHMA) for oil and gas development,
- A 0.6-mile avoidance zone around leks for power lines and towers, and
- A 5 percent limit on surface disturbance.

**Commented [JMM9]:** This should be PHMA as the parents includes GHMA

The approach of the Montana plan is similar to the Wyoming ~~Executive Order~~ ~~executive order~~. Montana's plan will apply a 5% disturbance cap in core habitat and will limit well density to one location per 640 acres and apply timing limitations to seasonal habitats. The 0.6-mile buffer around lekking grounds would protect males in the vicinity of leks during the breeding season; the density limits and disturbance cap would protect GRSG during nesting, brood-rearing, and winter concentration activities.

**Commented [JMM10]:** The Wyoming Executive Order has not yet been discussed in this document, therefore the reader has no context for comparison. Either include a brief description of the WY EO or delete this sentence.

#### *Oregon Statewide Efforts*

The Oregon Department of Fish and Wildlife (ODFW) has developed a strategy to promote conservation of GRSG and intact, functioning GRSG habitats in Oregon. The Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat (Oregon State Plan, Hagen 2011) describes the ODFW's proposed management of GRSG. It also provides guidance to public land management agencies and land managers for GRSG conservation. GRSG conservation guidelines in the State Plan are designed to maintain (at a minimum) or enhance the quality (the optimum) of current habitats. They will also assist resource managers in achieving the population and habitat objectives of the State Plan.

The Oregon State Plan provides biological recommendations for long-term conservation of GRSG in Oregon based on the best available science; however implementing recommendations is the responsibility of the respective land manager. Thus, the intent of the Oregon State Plan is plan is to inform decision-maker regarding the biological consequences of various actions on GRSG, but not to dictate land management decisions. Similarly, GRSG conservation proposed in the plan is voluntary on private lands (Hagen 2011, p. viii).

The Oregon State Plan establishes "Core Areas" to help delineate landscape planning units by distinguishing areas of high biological value to GRSG. These areas are based on the locations of breeding areas and are intended to help balance GRSG habitat requirements with development, which would be subject to stipulations and regulations (Hagen 2011, p. 80). ODFW developed Core Areas necessary to conserve 90 percent of Oregon's GRSG population with emphasis on highest density and important use areas which provide for breeding, wintering and connectivity corridors.

While the plan is comprised of voluntary management guidelines, the guidelines may be utilized by state regulatory agencies including the Energy Facility Siting Council as conditions of approval on a case-by-case basis for certain energy projects. For example, the council has jurisdiction on wind energy projects

greater than 105 MW (Dave Budeau, phone conversation with author, March 26, 2015).

Further, The Oregon Governor's natural resources department is currently in the process of developing regulations for GRSG conservation. The forthcoming Sage Grouse Conservation Action Plan will supplement the state plan and provide land use regulations and mitigations for Oregon core habitat areas (Dave Budeau, phone conversation with author, March 26, 2015).

The Oregon Department of State Lands (DSL) is working with the FWS to develop a Candidate Conservation Agreement with Assurances (CCAA) for State Common School Fund Rangelands to implement conservation measures on over 633,000 acres of DSL lands, including approximately 380,700 acres of low-density habitat, and 153,100 acres of core area habitat (80 FR 9475). The required Environmental Assessment under NEPA was made available for public comment on February 23, 2015.

Under the CCAA and associated Enhancement of Survival permit under the ESA, the DSL would voluntarily undertake management activities on their properties to enhance, restore, or maintain habitat benefiting GRSG, in exchange for assurances that DSL would not be subject to increased land use restrictions should GRSG become listed under the ESA in the future. The term of the CCAA and associated permit would be 30 years.

Under the CCAA, the DSL would prepare a Sage Grouse Habitat Assessment (SGHA), which would serve as a site-specific plan, for each land parcel under DSL administration. The SGHA would include conservation measures from the draft CCAA that would address all threats occurring on that parcel of land. The Service would review submitted SGHAs and approve them through a letter of concurrence if the SGHAs are consistent with the CCAA and permit terms and conditions.

*Nevada/California State Efforts*

Nevada State Plan. The state of Nevada submitted a state alternative for inclusion in the Nevada and Northeast California Sub-Regional Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement (EIS). The Nevada Greater Sage-Grouse Conservation Plan (Sagebrush Ecosystem Technical Team 2014) includes regulatory mechanisms to avoid, minimize (with the use of design features) and/or mitigate impacts through the Conservation Credit System (described in additional detail below) to protect and restore GRSG habitat. The plan defines Core Management Areas, and aims to reach a conservation objective of ~~no net unmitigated loss due to new anthropogenic disturbance~~.

**Commented [LLM11]:** The State of Nevada has now changed this to "Net Conservation Gain"

Under the plan, project proponents must seek to avoid GRSG habitat disturbance. If a project proponent wishes to demonstrate that avoidance cannot be reasonably accomplished, exemptions will be granted to this

restriction as part of the SETT Consultation. The project proponent must demonstrate that specific criteria are met; criteria are summarized in Table 3-1 of the plan. Criteria are more stringent in Core Management Areas, and become less so as habitat quality decreases. If a project cannot avoid adverse effects (direct or indirect) to GRSG habitat, the project proponent will be required to implement design features that minimize the project's adverse effects to GRSG habitat to the extent practicable. Mitigation will be required for all anthropogenic disturbances to GRSG habitat, including those that have minimized disturbances through the process above. Mitigation requirements will be determined by the Conservation Credit System, a market-based mechanism that quantifies conservation outcomes (credits) and impacts from new anthropogenic disturbances (debits), defines standards for market transactions, and tracks conservation action implementation progress in the state.

GRSG habitat is determined based on the Nevada Habitat Suitability Map (described below) for GRSG habitat prepared by the state and USGS. The habitat map incorporates GRSG telemetry data along with environmental data at multiple scales, such as land cover, vegetation communities, physiographic indices and anthropogenic attributes. The habitat suitability model will be used to inform management decisions on protecting the most critical habitat and to provide strategic decision tools to identify where conservation activities will have the greatest beneficial impact on the habitat.

The Nevada state plan only applies to the state; it does not apply to portions of the Nevada and Northeastern California Sub-region within California.

Nevada State Regulations/Programs. Nevada has several state regulations and programs pertaining to GRSG. Assembly Bill 461 formally created and gave regulatory authorization for the Sagebrush Ecosystem Program. Governor Sandoval signed the bill into law in July, 2013. Nevada also has a pesticide registration fee; portions of the revenue from the fee will provide funding to the state noxious weed program and GRSG habitat conservation (WGA 2014). The state also has a Nevada Cheatgrass Action Team (WGA 2014), a voluntary multi-disciplinary group of individuals to assist the SETT with planning and managing projects to address cheatgrass and other invasive or noxious weeds that impact GRSG habitat.

*Natural Resource Conservation Service Sage Grouse Initiative*

The Natural Resource Conservation Service's (NRCS) Sage Grouse Initiative (SGI) is working with private landowners in 11 western states to improve habitat for GRSG (Manier et al. 2013, p. 117). With approximately 31 percent of all sagebrush habitats across the range in private ownership (Stiver 2011, p. 39), and over 25 percent in MZ IV and nearly 38 percent in MZ II/VII (Manier et al. 2013, p. 118), a unique opportunity exists for the NRCS to benefit GRSG and ensure the persistence of large and intact rangelands by implementing the SGI (USFWS 2010, p.5).

**Commented [LLM12]:** Need to discuss California State Regulations/Program

Participation in the SGI program is voluntary, but willing participants enter into binding contracts or easements to ensure that conservation practices that enhance GRSG habitat are implemented. Participating landowners are bound by a contract (usually 3 to 5 years) to implement, in consultation with NRCS staff, conservation practices if they wish to receive the financial incentives offered by the SGI. These financial incentives generally take the form of payments to offset costs of implementing conservation practices and easements or rental payments for long-term conservation.

While potentially effective at conserving GRSG populations and habitat on private lands, incentive-based conservation programs that fund the SGI generally require reauthorization from Congress under subsequent farm bills. These funding streams are potentially variable as they are subject to the political process.

As of 2014, the most recent year for which data are available, SGI has secured conservation easements on 98,167 acres within MZ IV (NRCS 2015). On these and additional private lands, SGI has completed other GRSG conservation actions within MZ IV, including implementation of grazing systems, conifer removal, vegetation seeding, and fence marking. These conservation actions are targeted at the critical threats in each MZ, consistent with those outlined in the COT report. SGI clusters implementation to achieve landscape benefits.

#### *Other Regional Efforts*

Tribes, counties, and local working groups are playing a critical role in promoting GRSG conservation at the local level. Individual conservation plans have been prepared by most local working groups to develop and implement strategies to improve or maintain GRSG habitat and reduce or mitigate threats on the local level. The proposed conservation actions and recommendations in these plans are voluntary actions for private landowners.

Local working group projects have included monitoring, research, and mapping habitat areas, as well as public outreach efforts, such as landowner education and collaboration with federal, state, and other local entities.

Some local working group conservation plans recommend restricting resource uses as well. For example, the Big Desert Sage-Grouse Conservation Plan (Big Desert Sage-grouse Local Working Group 2010) limiting recreational OHV use to existing designated roads and trails. Local working group GRSG conservation plans in MZ IV include the following:

- North Magic Valley Conservation Plan (2011)
- West Central Conservation Plan (2010)
- East Idaho Uplands Conservation Plan (2011)
- Big Desert Conservation Plan (2010)
- Shoshone Basin Conservation Plan (2008)
- Jarbidge Conservation Plan (2007)

- Curlew Valley Conservation Plan (2004)
- Owyhee County Conservation Plan (2013)
- Upper Snake Conservation Plan (2009)
- Challis Conservation Plan (2010)

**Commented [LLM13]:** Need to discuss ongoing regional efforts in California as well

#### **5.1.5 Relevant Cumulative Actions**

This cumulative effects analysis considers past, present, and reasonably foreseeable future actions on other federal, state, tribal, local, and private lands in MZ IV. Where these actions interface with GRSG habitat, they would cumulatively add to the impacts of BLM- and Forest Service-authorized activities.

The following list includes past, present, and future actions in MZ IV that could cumulatively affect GRSG (more detail is included in the table in Appendix A):

- Gateway West 230/500 Transmission Line Project, Wyoming and Idaho
- Boardman to Hemingway Transmission Line Project, Oregon and Idaho
- Fuels and vegetation treatments throughout the MZ
- Grazing permit renewals and allotment management plan updates throughout the MZ
- China Mountain Wind Project, Nevada and Idaho
- Small mining projects throughout the MZ

Several Native American tribal members have expressed concern about military overflights causing mortality of GRSG chicks as they incubate within their eggs. Further investigation into these impacts is needed, as effects seem to be anecdotal.

#### **5.1.6 Threats to GRSG in Management Zone IV**

In its COT report, the USFWS identifies fire, spread of weeds, conifer encroachment, infrastructure, grazing/free-roaming equids, conversion to agriculture, energy development, and recreation as the present and widespread threats facing GRSG populations in MZ IV (USFWS 2013, pp. 22-24). These threats impact GRSG mainly by fragmenting and degrading their habitat. The loss of sagebrush steppe across the West approaches or exceeds 50 percent in some areas. It is a primary factor in long-term declines in GRSG abundance across its historical range (USFWS 2010).

Habitat fragmentation reduces connectivity of populations and increases the likelihood of extirpation from random events, such as drought or outbreak of West Nile virus. Furthermore, climate change is predicted to affect the distribution of species through changes in annual average precipitation, greater early season plant growth, and increased frequency and severity of wildfires (BLM 2013a). Sensitive species such as GRSG, which are already stressed by declining habitat, increased development, and other factors, could experience additional pressures as a result of climate change.



Each COT report threat considered present and widespread in at least one population in MZ IV is discussed below. The quantitative impact analysis focuses on impacts in the MZ (sub-region percentages are provided for context).

**Fire**

Nature and Type of Effects. Sagebrush killed by wildfire often requires many years to recover, especially after large fires. Contiguous old-growth sagebrush sites are at high fire risk, as are large blocks of contiguous dead sagebrush and sagebrush sites with a substantial cheatgrass understory. Before recovering, these sites are of limited use to GRSG, except along the edges and in unburned islands.

Because of its widespread impact on habitat, fire has been identified as a primary factor associated with GRSG population declines. Depending on the species of sagebrush and the size of a burn, a return to a full pre-burn community cover can take from 25 to 120 years (Baker 2011). In addition, fires can reduce invertebrate food sources and may facilitate the spread of invasive weeds.

While most sagebrush subspecies are killed by fire and slow to reestablish, cheatgrass recovers within one to two years of a fire from seed in the soil. This annual recovery leads to a reoccurring fire cycle that prevents sagebrush reestablishment (USFWS 2010, p. 13932).

BLM management to prevent or control wildfires can also affect GRSG and habitat. Increased human activity and noise associated with fire suppression, fuels treatments, and prescribed fire in areas occupied by GRSG could affect nesting, breeding, and foraging behavior. Important habitats could be altered because of the use of heavy equipment, hand tools, and noise.

In addition, suppression may initially result in higher rates of conifer encroachment in some areas. In the initial stages of encroachment, fuel loadings remain consistent with the sagebrush understory. As conifer encroachment advances, fire return intervals are altered by decreasing understory abundance. The depleted understory causes the stands to become resistant to low intensity wildfires; over years, the accumulating conifer loads contribute to larger-scale wildfires and confound control efforts due to extreme fire behavior.

Conditions in the Sub-region and in MZ IV. Wildfire has been a primary threat to GRSG habitats and populations occurring across MZ IV, with 81 percent of PPHMAPPH and PGHMAPGH having high risk for fire, including the Snake-Salmon-Beaverhead and Northern Great Basin population areas (Manier et al. 2013, p. 133). Since 2000, more than 4.9 million acres (14 percent of PPHMAPPH and 17 percent of PGHMAPGH) of GRSG habitats have burned in this MZ, with an average of more than 239,000 acres of priority habitats burned annually; more than 1 million acres burned in some years (Manier et al. 2013, p. 133). The Murphy Fire in Idaho and Nevada affected over 650,000 acres of habitat in this MZ in 2007 (USFWS 2013, p. 78). An additional factor in the

**Commented [jmbek14]:** There have been some large fires in SE Oregon in the last few years that could be mentioned here.

analysis of cumulative effects of fire on GRSG is the trend of increasing fire size and frequency and severity, due to factors including exotic annual grasses, and climate change.

The use of chaff and flares by the military may increase wildfire risk, but this risk is generally mitigated by release altitudes about 2,000 feet above ground level and only above 5,000 feet above ground level during fire risk categories 4 and 5 (Mountain Home Air Force Base 2012).

Impact Analysis. Management actions in the Idaho and southwestern Montana sub-region that emphasize wildfire suppression in GRSG habitat would benefit the species by limiting habitat loss in the event of wildfire. Under current management (Alternative A), prescribed burning may be used to achieve habitat objectives. Alternatives B through F and the Proposed Plan provide for similar protection and maintenance of sagebrush habitat in implementing prescribed burning. The action alternatives all prioritize sagebrush protection in fuels treatment programs and would provide superior protection for sagebrush in prescribed burning, fuels treatment and fire suppression. The Proposed Plan would further reduce impacts from wildland fire by conducting the wildland fire and invasive species assessments and subsequent prioritization of the landscape. This is in accordance with the COT report objective to retain and restore healthy native sagebrush plant communities within the range of GRSG.

Recognition of the importance of sagebrush habitat during interagency wildfire response would benefit GRSG in the event of an unplanned fire. The Montana ~~eExecutive eOrder~~ executive order emphasizes fire suppression in ~~eCore pPopulation eAreas~~ core population areas, while recognizing other suppression priorities may take precedent. This would benefit GRSG during wildfire planning and response, particularly on lands not administered by the BLM or Forest Service.

On the local level, the Owyhee County Sage-Grouse Conservation Plan (2013) recommends reseeding burned areas with sagebrush and implementing sagebrush restoration projects in historical GRSG habitat where historical fires have removed sagebrush cover. However, the conservation plan does not identify a funding source for this action.

The Interagency Standards for Fire and Fire Aviation Operations “Red Book” includes a BMP for GRSG habitat conservation for wildlife and fuels management (BLM 2013b). This document is a supplemental policy or guidance for the BLM, the Forest Service, and the USFWS. This BMP would benefit the GRSG during interagency wildland fire operations by using spatial habitat data and predictive services to prioritize and preposition firefighting resources in critical habitat areas. The coordination of federal, state, and local fire prevention past, present, and reasonably foreseeable future actions and changes in fire management under the Idaho and southwestern Montana LUPA as well as under the other BLM and

Forest Service LUPAs in MZ IV, would provide a net conservation gain to GRSG habitats and populations in MZ IV.

**Spread of Weeds**

Nature and Type of Effects. As discussed in **Section 3.3**, invasive weeds alter plant community structure and composition, productivity, nutrient cycling, and hydrology. Invasive weeds also may cause declines in native plant populations, including sagebrush habitat, through such factors as competitive exclusion and niche displacement. Invasive plants reduce and may eliminate vegetation that GRSG use for food and cover. Invasive weeds fragment existing GRSG habitat and reduce habitat quality by competitively excluding vegetation essential to GRSG. Invasive weeds can also create long-term changes in ecosystem processes, such as fire cycles and other disturbance regimes that persist even after an invasive plant is removed (Connelly et al. 2004).

Commented [jmbeck15]: 5.3?

Roads and recreation can promote the spread of invasive weeds through vehicular traffic. Weed infestations can further exacerbate the fragmentation effects of roadways. Irrigation water has also supported the conversion of native plant communities to hayfields, pasture, and cropland, thus fragmenting sagebrush habitats. Excessive grazing in these habitats can lead to the demise of the most common perennial grasses in this system and an abundance of invasive species, such as cheatgrass or Japanese brome (Reisner et al. 2013).

Conditions in the Sub-region and in MZ IV. Via seeds carried by wind, humans, machinery, and animals, invasive and noxious weeds have invaded and will continue to invade many locations in MZ IV, including the sub-region. Some species, including annual bromes and Canada thistle, have become so ubiquitous throughout the sub-region that it is considered economically unfeasible to attempt to control them. They are considered part of the vegetative landscape despite their adverse impacts on other vegetation. Canada thistle, although common throughout the sub-region, is not treated on a plant-by-plant basis; rather, it is treated when plant populations reach densities high enough to make it the majority species. Examples are when it is growing in the bottom of dry reservoirs, on recreation sites, and along established roads and undeveloped vehicle trails.

Commented [JMM16]: Typo?

Commented [jmbeck17]: Is this counter to FIAT and the recent secretary order? If so, we may want to reword here.

The BLM currently manages weed infestations through integrated weed management: biological, chemical, mechanical, manual, and educational methods. It is guided by the 1991 and 2007 RODs for Vegetation Treatment on BLM Lands in Thirteen Western States (BLM 1991) and by the 2007 Programmatic Environmental Report (BLM 2007). Weeds are managed in cooperation with county governments and represents a landscape-level approach across management jurisdictions.

Impact Analysis. Increased activity, such as surface disturbance, motorized transportation, and animal and human activity, would increase the chance for the establishment and spread of invasive plants.

Management under Alternative A would allow for the most acres of surface disturbance; therefore, the potential for invasive weed spread and establishment would be greatest under this alternative, and effects to GRSG (e.g. reduction in quality of habitat) would be more pronounced. All of the action alternatives would reduce surface disturbance and would include weed-prevention measures to some degree. Of all alternatives, the Proposed Plan would likely have the lowest potential for invasive weed spread and establishment, given the three percent anthropogenic disturbance threshold which would limit surface disturbance; extensive mitigation and monitoring plans; wildfire and invasive species assessments and subsequent prioritization; application of RDFs and BMPs; and requirement for no net loss of key GRSG habitat. The COT report objective for invasive species is to maintain and restore healthy native sagebrush plant communities.

Invasive species on BLM-administered and National Forest System lands would be controlled under all alternatives. This would provide a net conservation gain to GRSG by restoring degraded sagebrush habitat.

Relevant cumulative actions that result in surface-disturbing activities, such as ROWs and energy and mining projects, would increase the potential for the spread of invasive weeds on both federal and non-federal lands. Projects subject to the general stipulations outlined in the Montana ~~eExecutive eOrder~~ ~~eOrder~~ are required to control noxious and invasive weed species and to use native seed mixes during reclamation processes. These stipulations would benefit GRSG ~~eCore eCore habitat eAreas~~ ~~eAreas~~—by limiting the spread or establishment of invasive species, particularly on lands that lack BLM and Forest Service protective regulatory mechanisms. Further, the *Greater Sage-Grouse Habitat Conservation Strategy for NRCS in Idaho* has identified GRSG conservation measures related to invasive weeds, such as reducing the risk and rate of fire spread, restoration and rehabilitation, and weed control. A number of projects are ongoing or in the planning phase to treat nonnative, invasive species (Appendix A). These impacts would be the same under all alternatives.

These stipulations, in combination with other state and county noxious weed regulations, other past, present and reasonably foreseeable future actions, and management under the Proposed Plans for other BLM and Forest Service LUPAs in MZ IV, would provide a net conservation gain to GRSG habitats and populations in MZ IV under the Proposed Plan and the other project alternatives. The Proposed Plan may result in the greatest net conservation gain due to its three percent anthropogenic disturbance cap that should reduce potential for the spread of weeds during the 10-year analysis period.

#### ***Conifer Encroachment***

Nature and Type of Effects. Conifer woodlands, especially juniper (*Juniperus* spp.) and in some regions pinyon pine (*Pinus edulis*), may expand into sagebrush habitat and reduce availability of habitat for GRSG. Conifer expansion may be

encouraged by human activities, including fire suppression and grazing (Miller et al. 2011). If woodland development is sufficient to restrict shrub and herbaceous understory growth, habitat quality for GRSG will be reduced (Connelly et al. 2004). Mature trees offer perch sites for raptors; thus, woodland expansion may also increase the threat of predation, as with powerlines (Manier et al. 2013, p. 91). Locations within approximately 1,000 yards of current pinyon-juniper woodlands are at highest risk of expansion (Bradley 2010). Studies have shown that GRSG incur population-level impacts at very low levels of conifer encroachment (Baruch-Mordo et al. 2013). In MZ IV, conifer encroachment ~~is connected to reduced-reduces~~ habitat quality in important seasonal ranges when woodland development is sufficient to restrict shrub and herbaceous production (Connelly and others, 2004 in Manier et al. 2013, p. 91).

Commented [jimbeck18]: I think I kept the meaning of the sentence.

Conditions in the Sub-region and in MZ IV Approximately 55 percent of conifer encroachment risk in PPHMAPPH (and 34 percent in PGHMAPPH) occur on BLM-administered lands within MZ IV (Manier et al. 2013, p. 93). In comparison, 25 percent of conifer encroachment risk in PPHMAPPH (and 32 percent in PGHMAPPH) occur on private lands and 15 percent in PPHMAPPH occurs on National Forest System lands (25 percent in PGHMAPPH). Therefore, BLM actions are likely to have a greater potential to ameliorate the effects of conifer encroachment on GRSG, particularly in PPHMAPPH, than any other single land management entity.

Impact Analysis The COT objective is to remove pinyon-juniper from areas of sagebrush that are most likely to support GRSG (post-removal) at a rate that is at least equal to the rate of pinyon-juniper incursion (USFWS 2013, p. 47). Management under Alternatives D, E, and the Proposed Plan would target conifers in GRSG habitat for removal. Treatment acres under the Proposed Plan are presented in **Table 2-5**. The Proposed Plan would also incorporate GRSG habitat objectives to guide treatments. Alternatives A, B, C, and F are largely silent on conifer removal and thus would not serve to reduce this threat on BLM-administered and National Forest System lands in the planning area, though the cumulative impact of other past, present, and reasonably foreseeable future actions in the planning area and larger MZ would help reduce the threat across the MZ.

Relevant cumulative actions on federal, private, and state lands within the MZ include several large conifer removal projects (Appendix A). Further, the NRCS carries out conservation measures to remove encroaching conifers near leks and lek seasonal habitats while minimizing disturbance to GRSG (NRCS 2012, p. 13). SGI has helped reduce the threat of early succession conifer encroachment through mechanical removal on 206,099 acres of private lands within MZ IV. The majority of these efforts were located inside PACs (NRCS 2015), helping to preserve historic fire return intervals and important GRSG habitat.

In combination with past, present, and reasonably foreseeable future actions and Proposed Plans for other BLM and Forest Service LUPAs within MZ IV, the Idaho and southwestern Montana Proposed Plan would have the greatest reduction in the threat from conifer encroachment and provide a net conservation gain to GRSG. Alternatives D and E would also reduce the threat, though to a lesser degree than the Proposed Plan.

### **Infrastructure**

#### *Rights-of-Way*

Nature and Type of Effects. As discussed in **Section 4.2**, power lines can directly affect GRSG by posing a collision and electrocution hazard. They also can indirectly decrease lek attendance and recruitment by providing perches and nesting habitat for potential avian predators, such as golden eagles and ravens (Connelly et al. 2004). In addition, power lines and pipelines often extend for many miles. The ground disturbance associated with construction, as well as vehicle and human presence on maintenance roads, may introduce or spread invasive weeds over large areas, degrading habitat. Impacts from roads may include direct habitat loss from road construction and direct mortality from collisions with vehicles. Roads may also present barriers to migration corridors or seasonal habitats, facilitate predator movements, spread invasive plants, and increase human disturbance from noise and traffic (Forman and Alexander 1998).

Conditions in the Sub-region and in MZ IV. Infrastructure, such as ROWs and associated facilities and urbanization, is widespread throughout MZ IV. In some locations, infrastructure development has affected GRSG habitat. Development of roads, fences, and utility corridors has also contributed to habitat loss and fragmentation in portions of MZ IV. The best available estimates suggest about 25 percent of the MZ IV is within approximately 4 miles of urban development (Knick et al. 2011, p. 214). Impacts of infrastructure development in MZ IV are primarily related to highways, roads, power lines, and communication towers, with 90 percent of MZ I within 4 miles of a road, 30 percent within 4 miles of a power line, and 5 percent within 4 miles of a communication tower (Knick et al. 2011, pp. 215-216).

Although not representative of all infrastructure ROWs, transmission lines greater than 115 kilovolts indirectly influence 37 percent of PPHMAPPH and 38 percent of PGHMAPGH across MZ IV. Indirect effects are assumed to occur to a radius of 4 miles (Manier et al. 2013, p. 41). Approximately 62 percent of transmission lines in PPHMAPPH and 43 percent in PGHMAPGH are on BLM-administered lands across GRSG habitats in MZ IV (Manier et al. 2013, p. 41). In contrast, National Forest System lands contain 5 percent of transmission lines in PPHMAPPH and 7 percent in PGHMAPGH. Therefore, BLM actions are likely to have a greater potential to affect transmission line ROWs in GRSG habitat than any other land management entity. Designating ROW exclusion and avoidance areas in PHMA and GHMA on BLM-administered and National Forest System

lands could reduce the threat on these lands. However, in areas with scattered federal landownership, infrastructure may be routed around federal lands, often increasing its length and impact. ROW avoidance and exclusion areas on BLM-administered and National Forest System lands could increase this tendency.

Impact Analysis. **Table 5-2** lists the areas of ROW avoidance and exclusion in GRSG habitat by alternative. **Table 5-3** lists acres of PHMA and GHMA in existing or future utility corridors.

**Table 5-2**  
**Acres of Rights-of-Way Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open to Rights-of-Way <sup>2</sup>				
Alternative A	6,512,000	99%	2,006,000	98%
Alternative B	113,000	40%	1,922,000	98%
Alternative C	153,000	56%	N/A	N/A
Alternative D	116,000	41%	88,000	49%
Alternative E	69,000	0%	2,450,000	98%
Alternative F	113,000	40%	2,450,000	98%
Proposed Plan	98,000	29%	1,672,000	97%
Right-of-Way Exclusion				
Alternative A	922,000	74%	373,000	92%
Alternative B	8,411,000	97%	322,000	91%
Alternative C	11,264,000	98%	N/A	N/A
Alternative D	238,000	0%	30,000	3%
Alternative E	907,000	74%	339,000	91%
Alternative F	8,411,000	97%	361,000	92%
Proposed Plan	787,000	70%	493,000	94%
Right-of-Way Avoidance				

**Table 5-2**  
**Acres of Rights-of-Way Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative A	7,600,000	14%	3,630,000	22%
Alternative B	6,510,000	0%	3,541,000	20%
Alternative C	6,510,000	0%	N/A	N/A
Alternative D	14,682,000	56%	5,897,000	52%
Alternative E	13,478,000	52%	3,619,000	22%
Alternative F	6,510,000	0%	3,558,000	21%
Proposed Plan	6,646,000	58%	11,092,000	41%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations

This table displays the acres of PHMA and GHMA within rights-of-way designations in MZ IV; it also displays the percentage of those acres that are found within the planning area.

**Table 5-3**  
**Acres of Existing and Proposed Utility Corridors in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
	Proposed Utility Corridor			
Alternative A	134,000	31%	104,000	43%
Alternative B	134,000	30%	103,000	44%
Alternative C	174,000	49%	N/A	N/A
Alternative D	134,000	31%	104,000	43%
Alternative E	134,000	31%	103,000	43%



**Table 5-3  
Acres of Existing and Proposed Utility Corridors in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative F	134,000	34%	109,000	41%
Proposed Plan	118,000	24%	123,000	49%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA within existing and proposed utility corridors in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Alternative A (current management) has the most acres open to ROWs in PHMA. Across MZ IV, Alternative B, C, D, and F reduce the number of open acres in PHMA, with even larger reductions under Alternative E and the Proposed Plan. For GHMA, most of the action alternatives have comparable open acreage except for Alternative D, which has over a two-fold reduction. However, impacts would likely also be reduced under the Proposed Plan, which would use anthropogenic disturbance criteria to screen projects in GHMA. Alternatives B, C, and F would increase ROW exclusion areas in PHMA in MZ IV, whereas Alternatives A, E, and the Proposed Plan would have fewer acres managed as ROW exclusion in PHMA. Alternative D would have the fewest acres managed as ROW exclusion in both PHMA and GHMA. The other action alternatives would have a similar acreage managed as ROW exclusion compared to Alternative A.

In PHMA, Alternatives B, C, and F would not contribute acres of ROW avoidance within MZ IV, as PHMA would be managed as ROW exclusion under these alternatives. In contrast, Alternatives D, E, and the Proposed Plan manage PHMA as ROW avoidance, thereby increasing the acreage compared to Alternative A. The Proposed Plan offers additional protections due to the anthropogenic disturbance criteria, buffers, 3 percent disturbance cap, and mitigation requirements. Acres of utility corridors would be largely similar across all alternatives in both PHMA and GHMA.

Because of the additional protections under the Proposed Plan, this alternative provides the greatest net conservation gain to GRSG in the Idaho and southwestern Montana sub-region and is most likely to meet the COT report objective, which is to avoid development of infrastructure in GRSG priority areas for conservation.

**Commented [JMM19]:** Should the USFWS matrix be cited for calls like this throughout these documents?

The numbers of ROW authorizations are anticipated to grow in the sub-region. Increasing populations, continued energy development, and new communication sites drive the need for new ROWs on both federal and non-federal lands. For instance, the Boardman to Hemingway and Gateway West projects would influence GRSG habitat in MZ IV. While these projects would be exempted from the conservation measures in this plan, conservation measures for GRSG will be incorporated via the site-specific NEPA process for these projects. Actual impacts and contribution to cumulative effects from these projects are unknown at this time. Impacts on GRSG habitat on state or private land could be greater due to less restrictive management on those lands.

New ROW authorizations that require state agency review or approval would be subject to the permitting process and stipulations for development in GRSG Core areas under the Montana ~~eExecutive eOrder~~ executive order. These stipulations would benefit the GRSG in Core ~~aAreas~~ areas by encouraging ROW development outside of ~~eCore~~ core habitat ~~aAreas~~ areas, restricting surface occupancy within 0.6 mile of occupied leks, prohibiting power lines greater than 115 kV outside of designated corridors, and locating new roads used to transport products or waste over 1.9 miles from occupied leks.

In combination with the past, present, and reasonably foreseeable future actions and other BLM and Forest Service proposed plans in MZ IV, the Idaho and southwestern Montana Proposed Plan would provide the greatest net conservation gain to GRSG habitats and populations in MZ IV by providing the flexibility to site ROWs with the least impact on GRSG habitat.

#### *Renewable Energy*

Nature and Type of Effects. Impacts on GRSG from renewable energy development, such as that for wind and solar power, are similar to those from nonrenewable energy development. Additional concerns associated with wind energy developments are rotor blade noise, structure avoidance, and mortality caused by collisions with turbines (Connelly et al. 2004).

Conditions in the Sub-region and in MZ IV. Wind energy development is an increasing threat in some populations. Over the last six years, the BLM has authorized and then relinquished a ROW for wind development and has two pending applications. Wind testing sites have been authorized on BLM lands in the sub-region, though no wind developments have been authorized and constructed.

Solar energy potential is low in MZ IV, and the BLM has not received any applications for utility-scale solar production in the sub-region, nor are there solar resources comparable to the areas where utility-scale solar production projects are being proposed or built.

Although not representative of all renewable energy development, wind turbines indirectly influence less than 1 of ~~PPHMAPPH~~ and ~~PGHMAPGH~~

**Commented [jmbeck20]:** Where, is this BLM Idaho or Montana?

combined across MZ IV. Private lands account for 82 percent of wind turbines affecting GRSG in PPHMAPPH (and 62 percent in PGHMAPGH) within MZ IV. Therefore, actions on private land are likely to have a greater potential to ameliorate the effects of wind energy development than any other single land management entity.

Impact Analysis **Table 5-4** lists areas of wind energy ROW by alternative.

**Table 5-4**  
**Acres of Wind Energy Management Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open to Wind Rights-of-Way <sup>2</sup>				
Alternative A	6,104,000	0%	1,876,000	100%
Alternative B	0	0%	1,803,000	100%
Alternative C	85,000	0%	N/A	N/A
Alternative D	47,000	0%	44,000	98%
Alternative E	44,000	0%	2,244,000	100%
Alternative F	0	0%	2,237,000	100%
Proposed Plan	0	0%	1,501,000	100%
Wind Right-of-Way Exclusion				
Alternative A	6,846,000	21%	557,000	95%
Alternative B	13,644,000	60%	493,000	94%
Alternative C	16,452,000	67%	N/A	N/A
Alternative D	12,405,000	56%	412,000	93%
Alternative E	6,726,000	19%	621,000	95%
Alternative F	13,644,000	60%	553,000	95%
Proposed Plan	10,587,000	49%	1,261,000	98%
Wind Right-of-Way Avoidance				

**Table 5-4  
Acres of Wind Energy Management Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative A	3,084,000	33%	3,576,000	20%
Alternative B	1,390,000	0%	3,489,000	18%
Alternative C	1,390,000	0%	N/A	N/A
Alternative D	2,581,000	46%	5,554,000	48%
Alternative E	7,982,000	82%	3,544,000	19%
Alternative F	1,390,000	0%	3,496,000	18%
Proposed Plan	1,390,000	0%	6,050,000	53%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA within wind energy management designations in MZ IV; it also displays the percentage of those acres that are found within the planning area.

In the Idaho and southwestern Montana sub-region, the alternatives do not contribute to the open acres in PHMA in MZ IV, whereas the alternatives contribute most of the open and ROW exclusion acres in GHMA. Alternatives D and E manage the greatest acreage of PHMA as ROW avoidance, while Alternatives B, C, D, F, and the Proposed Plan would have the most acres managed as ROW exclusion for wind energy. The Proposed Plan would offer additional protections for PHMA, including anthropogenic disturbance criteria, a 3 percent disturbance cap, buffers, and mitigation requirements. Across MZ IV, most other sub-regions' proposed plans maintain exclusion areas in PHMA for wind energy, with the exception of Oregon which allows for avoidance in Lake, Harney, and Malheur counties. The Proposed Plan in Idaho would allow wind energy development in GHMA, subject to a screening process, whereas Montana would manage GHMA as avoidance for wind.

Projects that require state agency review or approval would be subject to the Montana ~~eExecutive eOrder~~ ~~executive order~~ permitting process. This would encourage wind energy development outside of ~~eCore~~ ~~core habitat~~ ~~aAreas~~ ~~areas~~. Implementation of the wind energy restrictions in the Idaho and southwestern Montana Proposed Plan, in combination with the disturbance caps under the Montana state plan, ROW exclusion areas in other BLM and Forest Service LUPAs, and other past, present, and reasonably foreseeable future actions,

would provide a net conservation gain to GRSG habitats and populations in MZ IV.

***Grazing/Free-Roaming Equids***

Nature and Type of Effects. In general, livestock can influence habitat by modifying plant biomass, plant height and cover, and plant species composition. As a result, livestock grazing could cause changes in habitat that alter species abundances and composition in GRSG insect prey. Changes in plant composition could occur in varying degrees and could change vegetative structure, affecting cover for nesting birds. Grazing could also alter fire regimes (Davies et al. 2010).

If not managed properly, cattle and sheep grazing can compact soil, enrich soil with nutrients, trample vegetation and nests, directly disturb GRSG and negatively affect GRSG recruitment. Cattle and sheep also can reduce invertebrate prey for GRSG or increase their exposure to predators (Beck and Mitchell 2000, pp. 998-1,000; Knick 2011; Coates 2007, pp. 28-33). Grazing in riparian areas can destabilize streams and riverbanks, cause the loss of riparian shade, and increase sediment and nutrient loads in the aquatic ecosystem (George et al. 2011). Stock watering tanks can contribute to stream and aquifer dewatering and may concentrate livestock movement and congregation in sensitive areas (Vance and Stagliano 2007).

However, grazing can reduce the spread of invasive grasses, if applied annually before the grasses have dried. It also can be used to reduce fuel load (Connelly et al. 2004, p. 7, 28-30). Light to moderate grazing does not appear to affect perennial grasses, which are important to nest cover (Strand and Launchbaugh 2013).

Periodic overgrazing can damage range resources over the long term. It often exacerbates drought effects when stocking levels are not quickly reduced to match the limited forage production. The degree to which grazing affects habitat depends on several factors, such as the number of animals grazing in an area, the time of grazing, and the grazing system used.

A well-developed understory of grass, forbs, and deciduous shrubs is critical for GRSG and other wildlife. Impacts on habitat vary with livestock densities and distribution; the more evenly livestock is distributed, the lower their impact on any given area (Gillen et al. 1984). However, cattle show a strong preference for certain areas, leading to high use in some areas and little to no use in others. Livestock grazing is generally limited by slopes of greater than 30 percent, dense forests and vegetation, poor or little upland forage, and lack of water.

Since the passage of the 1934 Taylor Grazing Act, range conditions on BLM-administered lands have improved due to improved grazing management practices and decreased livestock numbers and annual duration of grazing.

In addition, the BLM has applied Standards for Rangeland Health since 1997. Similarly, the Forest Service has multiple regulations requiring application of rangeland health standards. The purpose of this practice is to enhance sustainable livestock grazing and wildlife habitat, while protecting watersheds and riparian ecosystems.

Although livestock grazing is the most widespread land use across the sagebrush biome, it exerts a more limited influence on soils and vegetation than land uses that remove or fragment habitat (e.g., mineral extraction or infrastructure development). Thus, reducing AUMs or acres open to grazing would not necessarily restore high quality GRSG habitat.

Reducing grass height caused by livestock grazing in GRSG nesting and brood-rearing areas has been shown to negatively impact nesting success. This was the case when residual herbaceous cover was reduced below the approximately 7 inches needed for predator avoidance (Gregg et al. 1994). Livestock grazing could reduce the suitability of breeding and brood-rearing habitat, which would impact GRSG populations (USFWS 2010).

For BLM-administered and National Forest System lands, Standards for Rangeland Health require the agencies to ensure that the environment contains all of the necessary components to support viable populations of sensitive, threatened, and endangered species in a given area relative to site potential. The BLM Washington Office IM 2009-018 requires that land health considerations, such as vegetation cover for GRSG, are primary considerations for prioritizing the processing of grazing authorizations.

Livestock grazing impacts wildlife habitats, including habitats for numerous special status species. Potential impacts from livestock grazing would be minimized by managing BLM-administered and National Forest System lands to meet Standards for Rangeland Health, closing areas that fail to meet these standards, or changing grazing seasons and livestock numbers if grazing were a cause of the area's failure to meet Standards for Rangeland Health.

Range improvements could result in livestock overusing important GRSG areas. For example, developing springs would generally change vegetative composition from a high diversity of grasses and forbs, important to broods, to one dominated by grasses; conversely, in areas where livestock use was not well managed, invasive forbs would rise in prevalence.

Concentrated livestock use would remove standing vegetation and subsequently reduce associated insects and forbs, both of which are important to GRSG broods. Allowing spring developments along ephemeral streams and wetlands and allowing livestock watering tanks would decrease GRSG habitat. Springs, seeps, and wetland areas are vitally important to GRSG broods; therefore, allowing spring developments under this alternative could benefit some resources but not GRSG.

**Commented [JMM21]:** Re-word because This isn't exactly true. Standard #4 of the "Standards for Healthy Rangeland and Guidelines for Livestock Grazing Management for Public Lands Administered by the Bureau of Land Management in the State of Wyoming" is:

Rangelands are capable of sustaining viable populations and a diversity of native plant and animal species appropriate to the habitat. Habitats that support or could support threatened species, endangered species, species of special concern, or sensitive species will be maintained or enhanced.

**Commented [JMM22]:** Also not true. The IM serves as an aid to the field offices in determining priorities for focusing resources when processing permits and leases. The focus is based upon the categorization of an allotment – I, M or C. The IM is based around rangeland health but does consider critical habitats conditions, conflicts with sage grouse, and whether projects have been proposed for implementing the Healthy Lands initiative.

**Commented [jmbeck23]:** Rangeland Health applies to BLM only. The FS has something else; however, I don't know what it is.

**Commented [JMM24]:** The authorized officer shall take appropriate action upon determining that existing management needs to be modified to ensure that standards are met or are making significant progress towards meeting standards. Modifying management could involve a variety of actions including, but not limited to, changing animal kind, changing season of use, adjusting AUMS, adjusting livestock numbers, implementing a grazing prescription or implementing range improvement projects. Recommend deleting this section.

Wild horse and burro grazing has similar impacts as livestock grazing in their effect on soils, vegetation health, species composition, water, and nutrient availability by consuming vegetation, redistributing nutrients and seeds, trampling soils and vegetation, and disrupting microbial systems (Connelly 2004).

Conditions in the Sub-region and in MZ IV. Livestock grazing is present and widespread on many land types, such as federal and private, across MZ IV. Rangeland health assessments have found that over 19 percent of BLM-administered grazing allotments in GRSG habitat in MZs II/VII are not meeting wildlife standards with grazing as a causal factor (Manier et al. 2013, p. 97). Additionally, nearly 2 million acres of GRSG habitat within MZ IV is federally managed wild horse and burro range (Manier et al. 2013, p. 102).

Commented [JMM25]: Later (pg 71) in the document, this is 4.

Perhaps the most pervasive change associated with grazing management in GRSG habitats throughout MZ IV is the construction of fencing and water developments (Knick et al. 2011, p. 224). Barbed wire fences contribute to direct mortality through fence collisions (Stevens et al. 2011); water developments may contribute to the increased occurrence of West Nile virus (Walker and Naugle 2011).

Additional habitat modifications associated with grazing management are mechanical and chemical treatments to increase grass production, often by removing sagebrush (Knick et al. 2011). Standards for Rangeland Health protect habitat from elements detrimental to GRSG, but not all rangelands in MZ IV are in compliance with these standards.

Wild horses also occur within MZ IV and the sub-region; within MZ IV, 5.7 percent of PPH is negatively influenced by free-roaming equids (Manier et al. 2013, p. 102). Six designated herd management areas (HMAs) and nine herd areas occur on BLM-administered lands in the sub-region; no active wild horse and burro territories occur on National Forest System lands in the sub-region (**Section 3.6**). The BLM establishes an appropriate management level (AML) for each HMA, which represents the population objective.

Impact Analysis. On all lands in the sub-region, the BLM manages livestock grazing on 12,129,800 acres, encompassing 2,654 grazing allotments, while the Forest Service manages 9,646,900 acres encompassing 319 grazing allotments. **Table 5-5** lists the acres of PHMA and GHMA available and unavailable for grazing, by alternative.

**Table 5-5  
Acres Available and Unavailable to Livestock Grazing in GRSG Habitat in MZ IV**

Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area

**Table 5-5  
Acres Available and Unavailable to Livestock Grazing in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Available to Livestock Grazing				
Alternative A	14,822,000	55%	5,846,000	51%
Alternative B	14,822,000	55%	5,652,000	50%
Alternative C	6,700,000	0%	N/A	N/A
Alternative D	14,822,000	55%	5,846,000	51%
Alternative E	14,228,000	53%	6,289,000	55%
Alternative F	14,822,000	55%	6,152,000	54%
Proposed Plan	11,691,000	43%	8,681,000	67%
Unavailable to Livestock Grazing				
Alternative A	123,000	25%	66,000	52%
Alternative B	123,000	25%	62,000	50%
Alternative C	11,166,000	99%	32,000	0%
Alternative D	123,000	25%	66,000	52%
Alternative E	135,000	32%	51,000	37%
Alternative F	123,000	25%	62,000	50%
Proposed Plan	262,000	65%	124,000	75%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA available and unavailable to livestock grazing in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Acres available to livestock grazing in PHMA and GHMA are similar across most alternatives. Acres unavailable to livestock grazing would be greatest under Alternative C, which closes all GRSG habitat to grazing, followed by Alternative F, which would reduce grazing by 25 percent in PHMA. Such reductions and closures would benefit GRSG by maintaining nesting cover for protection and



forage; however, the increased need for fencing to exclude grazing animals could also harm nesting GRSG by increasing the likelihood of predation and collision.

However, as discussed, moderate grazing is compatible with GRSG habitat; thus, closing acres to grazing may not itself benefit or harm GRSG. Possibly equally or more beneficial is restricting range improvements in GRSG habitat, limiting fencing, and effectively implementing range health standards on grazing allotments in GRSG habitat. Alternatives B through F and the Proposed Plan include grazing restrictions (to varying degrees) which would help protect GRSG from potential impacts such as habitat changes due to herbivory and collisions with fencing. In terms of impacts on BLM-administered and National Forest System lands, Alternative A would have no GRSG-specific protective grazing restrictions, and would therefore have the greatest impacts on the species. Alternative C would have no areas available for livestock within with designated habitat, and would therefore have the fewest impacts on the species. However, as a result of restricting grazing in GRSG habitat under Alternative C, increased fencing on private lands may occur. This could result in higher cumulative effects though mortality from fencing collisions. Reduced grazing under Alternative F would have similar, but fewer impacts, compared to Alternative C.

The COT report objectives for livestock grazing are to manage grazing in a manner consistent with local ecological conditions. This management would maintain or restore healthy sagebrush shrub and native perennial grass and forb communities and conserve essential habitat components for GRSG. Restoration to meet these standards and adequate monitoring would be required. The COT report also states that land managers should avoid or reduce the impact of range management structures on GRSG habitat.

If BLM-administered and National Forest System lands were made unavailable for livestock grazing, as under Alternative C, this could increase grazing pressure on adjacent private lands. Loss of federal grazing permits would pose a threat of indirect adverse effects, including potential conversion of private grazing lands to agriculture, if the loss of federal grazing rights made ranching less economically viable.

Since 2010, SGI has enhanced rangeland health through rotational grazing systems, re-vegetating former rangeland with sagebrush and perennial grasses and control of invasive weeds. On privately-owned lands, SGI has developed a prescribed grazing approach that balances forage availability with livestock demand. This system allows for adjustments to timing, frequency, and duration of grazing, ensuring rangelands are managed sustainably to provide continued ecological function of sagebrush-steppe. A primary focus of the prescribed grazing approach is maintenance of key plant species, such as deep-rooted perennial grasses that have been shown to be essential for ecological resistance to invasive annual grasses (Reisner et al. 2013, pp. 1047-1048). These actions

help to alleviate the adverse impacts associated with improper grazing practices outlined above under Nature and Type of Effects. Within MZ IV, SGI has implemented 314,930 acres of prescribed grazing systems. This program is likely the largest and most impactful program on private lands within MZ IV. Because of its focus on priority areas for conservation, which often overlap PHMA, the SGI's past, present, and reasonably foreseeable work has had and likely will continue to have a cumulative beneficial impact on GRSG when considered alongside protective BLM management actions in PHMA.

In combination with NRCS actions under the Sage-Grouse Initiative (e.g., fence marking and conservation easements), state efforts to maintain ranchland, other past, present, and reasonably foreseeable future actions, and other BLM and Forest Service Proposed Plan in MZ IV, BLM and Forest Service management actions in the Idaho and southwestern Montana sub-region would provide a net conservation gain to GRSG habitats and populations.

Under all alternatives the BLM has the ability to adjust appropriate management levels of wild horses if resource damage occurs; however, only Alternatives B through F and the Proposed Plan provide management guidelines specific to GRSG habitat (e.g. prioritizing gathers in GRSG habitat), which would benefit the species more than Alternative A. Other past, present, and reasonably foreseeable future actions are unlikely to affect the threat from wild horses and burros, as these animals are federally-managed. Evaluating AMLs with consideration of GRSG habitat objectives for BLM-administered lands within MZ IV would provide a net conservation gain for GRSG habitats and populations.

**Conversion to Agriculture**

Nature and Type of Effects. Converting sagebrush habitat to agricultural use, commonly referred to as sodbusting, causes direct loss of habitat available for GRSG. Habitat loss also decreases the connectivity between seasonal habitats, increasing population isolation and fragmentation. Fragmentation then increases the probability for decline of the population, reduced genetic diversity, and extirpation from stochastic events (Knick and Hanser 2011).

In addition to reducing the land area available to support GRSG, habitat loss and fragmentation also increase the likelihood of other disturbances, such as human traffic, wildfire, and invasive plant spread.

Converting cropland has eliminated or fragmented sagebrush on private lands in areas with deep fertile soils or irrigation potential. Sagebrush remaining in these areas has been limited to the agricultural edge or to relatively unproductive environments.

Conditions in the Sub-region and in MZ IV. Regional assessments estimate that while only 1 percent of [PHMA](#) and [GHMA](#) in MZ IV are directly

influenced by agricultural development, over 85 percent of these habitats are within approximately 4 miles of agricultural land (Manier et al. 2013, p. 27).

Impact Analysis. The BLM and Forest Service do not convert public lands to agriculture. As such, the only direct authority these agencies have over conversion to agriculture is by retaining or disposing of lands in the realty program. Lands retained under BLM and Forest Service management will not be converted to agriculture and disposing of lands could increase the likelihood they will be converted to agriculture, depending on their location and new management authority.

As shown below in **Table 5-6**, acres identified for retention are similar in the sub-region and in MZ IV among the alternatives. Under Alternatives B, C, D, F, and the Proposed Plan, the BLM and Forest Service would generally retain GRSG habitat, thereby eliminating the possibility that GRSG habitat would be converted to agriculture use. Alternatives A and E do not specify retention of GRSG habitat, and thus there is the possibility of these lands being disposed. Most acres within MZ IV that are identified for disposal under Alternatives A and E are within the Idaho and southwestern Montana sub-region. However, land tenure adjustments require site-specific NEPA analysis and land sales must meet the disposal criteria under applicable law. BLM land tenure adjustments are not anticipated to be a significant contributing element to the threat of agriculture conversion.

**Table 5-6**

**Acres Identified for Retention and Disposal in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Acres Identified for Retention				
Alternative A	12,351,000	45%	4,931,000	45%
Alternative B	15,000,000	55%	4,760,000	43%
Alternative C	17,882,000	62%	N/A	N/A
Alternative D	14,999,000	55%	5,804,000	53%
Alternative E	11,787,000	42%	5,352,000	49%
Alternative F	15,000,000	55%	5,210,000	48%

**Table 5-6**  
**Acres Identified for Retention and Disposal in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Proposed Plan	11,976,000	43%	8,628,000	69%
Acres Identified for Disposal				
Alternative A	520,000	99%	432,000	59%
Alternative B	4,000	0%	432,000	59%
Alternative C	4,000	0%	N/A	0%
Alternative D	5,000	10%	183,000	2%
Alternative E	436,000	99%	519,000	66%
Alternative F	4,000	0%	448,000	60%
Proposed Plan	156,000	0%	179,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA identified for retention and disposal in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Cumulative impacts vary relatively little across alternatives because BLM and Forest Service management have little impact on alleviating this threat. Restrictions on grazing on federal land could increase agriculture pressure on adjacent private lands. If the loss of federal grazing rights makes ranching economically unviable, the potential conversion of private grazing lands to agriculture would increase. However, the Proposed Plan does not substantially increase acreage unavailable to grazing.

The COT report objectives for converting land to agriculture are to avoid further loss of sagebrush habitat for agricultural activities (both plant and animal production) and to prioritize restoration. In areas where taking agricultural lands out of production has benefited GRSG, the programs supporting these actions should be targeted and continued (USFWS 2013, p. 48). In accordance

with this objective, the NRCS's SGI program focuses on maintaining rangeland that provides habitat for GRSG. This voluntary program provides private landowners with monetary incentives to protect GRSG habitat, often through conservation easements. As a result, private land containing GRSG habitat is protected from conversion to agriculture or other development for the life of the conservation agreement. The conservation easements and other conservation incentives, such as restoration of water features and fence marking, can enhance the ability of private ranchlands to support GRSG. As of 2014, SGI has secured conservation easements on 98,167 acres within MZ IV and marked or removed 95 miles of fence (NRCS 2015). This has preserved habitat and reduced the risk of direct mortality on these lands. As a result, these efforts, in conjunction with other past, present, and reasonably foreseeable future actions, and other BLM and Forest Service Proposed Plans in MZ IV, BLM and Forest Service management in the Idaho and southwestern Montana sub-region, would provide a net conservation gain to GRSG habitats and populations in MZ IV.

#### ***Energy Development and Mining***

The COT report states that energy development should be designed to ensure that it will not impinge on stable or increasing GRSG population trends. For mining, the objective is to maintain stable to increasing GRSG populations and no net loss of GRSG habitats in areas affected by mining (USFWS 2013, p. 49).

There are approximately 1,137,700 acres of GRSG habitat in MZ IV where energy and mineral development (including geothermal, mineral materials, wind energy, and non-energy leasable minerals) is presently occurring. There are 6,553,300 acres indirectly influenced by energy development (including oil and gas, mineral materials, and wind energy; indirect effects were not quantified for geothermal and nonenergy leasable mineral developments) (Manier et al. 2013, pp. 52-71). No coal or oil and gas development is presently occurring in MZ IV.

#### ***Oil and Gas***

Nature and Type of Effects. As discussed in **Section 4.2**, oil and gas development impacts GRSG and sagebrush habitats through direct disturbance and habitat loss from well pads, access construction, seismic surveys, roads, power lines, and pipeline corridors. Indirect disturbances result from noise, gaseous emissions, changes in water availability and quality, and human presence. These factors could cumulatively or individually lead to habitat fragmentation in the long term (Connelly et al. 2004; Holloran 2005).

Oil and gas development results in direct loss of habitat from well pad and road construction as well as indirect disturbance impacts from increased noise and vehicle traffic. Oil and gas development also directly impacts GRSG through the species' avoidance of infrastructure. This development can also impact GRSG survival or reproductive success. Indirect effects include habitat quality changes, predator communities, and disease dynamics (Naugle et al. 2011).

Conditions in the Sub-region and in MZ IV. There is currently no oil and gas development within MZ IV (Manier et al. 2013, p. 52) and approximately 346,000 acres (1 percent) of GRSG habitat are leased but undeveloped (Manier et al. 2013, p. 55). There are two leases in Bonneville County in the sub-region within MZ IV (**Section 3.12**).

Less than one percent of GRSG habitat in MZ IV is within 1.8 miles of oil and gas wells (Knick et al. 2011, p. 240). Oil and natural gas development-related wells on BLM-administered lands indirectly influence 55 percent of PPHMAPPH and 45 percent of PGHMAPGH across MZ IV, occurring to a distance of 12 miles from the development. Private surface lands account for 45 percent of indirect effects in PPHMAPPH and 55 percent in PGHMAPGH in MZ IV (Manier et al. 2013, p. 52). The Forest Service does not have any direct or indirect effects within this MZ. Thus, actions on BLM-administered and private land have essentially the same potential to ameliorate the effects of oil and gas development within MZ IV.

Although oil and gas activities have a disproportionately greater effect on private lands, regulatory mechanisms on both federal surface and split estate lands in MZ IV are influential. Split estate lands with federal subsurface minerals may provide mitigation for impacts on GRSG habitat on private surface lands that would not be required on lands with both privately held surface and subsurface.

According to the RFD scenario (Appendix X), permanent disturbance associated with oil and gas development is projected to occur on 156 acres within the sub-region over the next 10 years, representing less than one percent of GRSG habitat within either the sub-region or MZ IV. The potential for impacts would be reduced where areas are closed to fluid mineral leasing and where NSO and CSU/TL stipulations are applied. Given the small acreage and implementation of RDFs and BMPs (**Appendix B**), the likelihood for impacts on GRSG habitat on BLM-administered and National Forest System lands is anticipated to be small and localized under all alternatives.

Impact Analysis. **Tables 5-7** and **5-8** provide a quantitative summary of fluid mineral leasing conditions on BLM-administered and National Forest System lands across MZ IV, followed by an analysis of the Idaho and southwestern Montana sub-regional alternatives.

**Table 5-7**

**Acres Open\* and Closed to Fluid Mineral Leasing in GRSG Habitat in MZ IV**

Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open <sup>2</sup> to Fluid Mineral Leasing			

**Commented [jimbeck26]:** I think we need to define oil and gas development because we say there is not in MZ 4 however less than 1% is within 1.8 miles of an oil and gas well. May confuse folks. If there is no development, why are there wells? Also, the Four Rivers FO has oil and gas activity that will probably be producing soon.

**Commented [RMS27]:** In the NV portion of MZ IV, specifically the Elko area, the NV RFD discloses the proposed plan projects 180 acres of disturbance associated with O/G in the Elko area. I have attached an excerpt from the document. Though 156 acres of disturbance is close to the 180, I did not know if additional acres are projected in ID

**Table 5-7**  
**Acres Open\* and Closed to Fluid Mineral Leasing in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative A	8,595,000	100%	6,534,000	58%
Alternative B	4,000	0%	5,837,000	53%
Alternative C	4,000	0%	2,744,000	0%
Alternative D	5,833,000	100%	5,961,000	54%
Alternative E	7,985,000	100%	6,931,000	60%
Alternative F	4,000	0%	6,363,000	57%
Proposed Plan	8,000	59%	8,626,000	68%
<b>Closed to Fluid Mineral Leasing</b>				
Alternative A	7,732,000	7%	677,000	25%
Alternative B	15,922,000	55%	676,000	25%
Alternative C	19,113,000	62%	505,000	0%
Alternative D	10,092,000	29%	806,000	37%
Alternative E	7,798,000	8%	614,000	18%
Alternative F	15,922,000	55%	690,000	27%
Proposed Plan	12,850,000	44%	1,529,000	67%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard lease terms and conditions. This table displays the acres of PHMA and GHMA open and closed to fluid mineral leasing in MZ IV; it also displays the percentage of those acres that are found within the planning area.

**Table 5-8**  
**Acres with NSO and CSU/TL Stipulations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area

**Table 5-8**  
**Acres with NSO and CSU/TL Stipulations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
NSO Stipulations				
Alternative A	7,332,000	12%	685,000	93%
Alternative B	6,485,000	0%	545,000	92%
Alternative C	6,485,000	0%	45,000	0%
Alternative D	6,597,000	2%	718,000	94%
Alternative E	13,543,000	52%	660,000	93%
Alternative F	6,485,000	0%	550,000	92%
Proposed Plan	11,354,000	43%	3,828,000	99%
CSU/TL Stipulations				
Alternative A	1,138,000	100%	617,000	100%
Alternative B	18,000	100%	3,295,000	18%
Alternative C	18,000	100%	2,715,000	0%
Alternative D	142,000	100%	5,309,000	49%
Alternative E	74,000	100%	3,290,000	17%
Alternative F	18,000	100%	3,295,000	18%
Proposed Plan	0	0%	5,042,000	46%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA with NSO Stipulations and CSU/TL Stipulations in MZ IV; it also displays the percentage of those acres that are found within the planning area.

As shown in **Tables 5-2** and **5-3**, fluid mineral closures and stipulations within the Idaho and southwestern Montana sub-region exert a fairly large influence within the broader MZ. Alternatives B, C, and F would provide the greatest protection to GRSG in the MZ by closing PHMA to new leases. This would reduce well density and impacts associated with construction and operation. Acres open and closed in GHMA would be similar across the alternatives,



though the Proposed Plan would have approximately double the acreage closed in GHMA compared to the other alternatives. Acres managed as NSO would be similar across alternatives in PHMA and GHMA, with more acres managed as NSO under Alternative E and the Proposed Plan. The Proposed Plan would provide additional protections to GRSG from fluid mineral development by requiring anthropogenic disturbance criteria, a 3 percent disturbance cap, buffers, mitigation requirements, RDFs and BMPs, and by managing SFAs as NSO with no waivers, exceptions, and modifications.

Restoring disturbed habitats would require the reestablishment of native shrubs and forbs, including big sagebrush, which would benefit GRSG; however, restored habitats may not support GRSG for long periods following restoration (Arkle et al. 2014). For this reason, successful restoration may not be successful without a nearby source population.

Overall, under the Proposed Plan, the combination of past, present, and reasonably foreseeable future actions for oil and gas exploration and development, Montana state actions, planned restoration activities, and other BLM and Forest Service Proposed Plans will provide a net conservation gain to GRSG habitats and populations in MZ IV.

#### *Geothermal*

Nature and Type of Effects. Impacts to GRSG from geothermal development are not well documented since geothermal development has been too recent to identify any immediate or lag effects (Knick et al. 2011 in Manier et al. 2013, p. 70). However, geothermal development is similar to fossil-fuel development and direct impacts to habitats would occur from development of power plants, access roads, pipelines and transmission lines. As a result, impacts of geothermal developments to GRSG from direct habitat loss, habitat fragmentation via roads and transmission lines, noise, and increased human presence (Connelly et al. 2004) may be similar to those discussed for nonrenewable energy development. Comparable effects on local GRSG populations are also anticipated (Manier et al. 2013, p. 70). Other concerns related to geothermal energy development include air and water pollution, disposal of hazardous waste, land subsidence, and release of toxic gases into the environment (Manier et al. 2013, p. 70).

Conditions in the Sub-region and MZ IV. Geothermal energy development potential is particularly high throughout MZ IV and geothermal leases directly affect 75,900 acres (less than 1 percent) of GRSG habitats in the MZ (Manier et al. 2013, p. 71). Geothermal leases in the sub-region cover 60,000 acres (**Section 3.12**).

The RFD scenario for the Idaho and southwestern Montana sub-region (**Appendix X**) predicts up to 410 acres of permanent disturbance associated with geothermal development over the next 10 years. The potential for impacts would be reduced where areas are closed to fluid mineral leasing and where NSO and CSU/TL stipulations are applied. Given the small acreage and

implementation of RDFs and BMPs (**Appendix B**), the likelihood for impacts on GRSG habitat is anticipated to be small and localized under all alternatives.

Impact Analysis. The quantitative analysis of effects from geothermal leasing would be the same as described for oil and gas because allocations and past, present, and reasonably foreseeable future actions would be the same.

*Coal*

Coal potential is low throughout MZ IV (Manier et al. 2013, p. 133) and there are no direct or indirect effects from surface coal leases in the MZ (Manier et al. 2013, p. 74). There is no coal development in the sub-region and lands are determined to be unsuitable for leasing; thus this threat will not be described further in this document.

*Mineral Materials*

Nature and Type of Effects. Development of surface mines (for sand, gravel and other common mineral materials found in MZ IV) may negatively impact GRSG numbers and disrupt the habitat and life-cycle of the species, similar to other types of mining activities (Braun 1998; Manier et al. 2013, pp. 70-71).

Conditions in the Sub-region and in MZ IV. There are 652,000 acres of mining and mineral materials disposal sites (not including minerals mined as energy sources) on BLM-administered surface land on PHMAPPH and GHMAPGH in MZ IV. There are 1,049,600 acres across all landownership types, making BLM-administered land the largest contributor to direct effects from this threat. National Forest System lands contribute to direct effects on 170,200 acres of PHMAPPH and GHMAPGH. Indirect effects are estimated to 1.5 miles out from the direct effects area. (Manier et al. 2013, p. 77).

The mineral materials currently being developed for commercial purposes in the Idaho and southwestern Montana sub-region include stone, sand and gravel, limestone, soil, and pumice.

Across MZ IV, PHMA and GHMA are most affected by mining and mineral materials disposal sites on BLM-administered lands. GRSG may be directly impacted, being in the path of development; however, indirect impacts on habitat affect a much wider population of birds. In total, 61 percent of PHMAPPH and 48 percent of GHMAPGH influenced by the indirect impact of mining and mineral materials disposal sites are on BLM-administered land. This does not include minerals mined as energy sources. Mining and mineral materials disposal sites on private land, by comparison, indirectly affect 26 percent of PHMAPPH and 34 percent of GHMAPGH. National Forest System lands indirectly affect 10 percent of PHMAPPH and 13 percent of GHMAPGH (Manier et al. 2013, p. 77). As a result, management of mining and material disposal sites on BLM-administered land would have the greatest impact on GRSG habitat conditions.

Impact Analysis. **Table 5-9** provides a quantitative summary of acreages of BLM-administered and National Forest System lands open and closed to mineral material disposal across MZ IV.

**Table 5-9**  
**Acres Open and Closed to Mineral Material Disposal in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open to Mineral Material Disposal <sup>2</sup>				
Alternative A	8,595,000	100%	6,534,000	58%
Alternative B	4,000	0%	5,837,000	53%
Alternative C	4,000	0%	2,744,000	0%
Alternative D	5,833,000	100%	5,961,000	54%
Alternative E	7,985,373	100%	6,931,000	60%
Alternative F	4,000	0%	6,363,000	57%
Proposed Plan	8,000	59%	8,626,000	68%
Closed to Mineral Material Disposal				
Alternative A	7,732,000	7%	677,000	25%
Alternative B	15,922,000	55%	676,000	25%
Alternative C	19,113,000	62%	505,000	0%
Alternative D	10,092,000	29%	806,000	37%
Alternative E	7,798,000	8%	614,000	18%
Alternative F	15,922,000	55%	690,000	27%
Proposed Plan	12,850,000	44%	1,529,000	67%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA open and closed to mineral material disposal in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Under Alternatives B, C, F, and the Proposed Plan, all PHMA would be closed to mineral material disposal, which would constitute much of the closed acreage on BLM-administered and National Forest System lands in MZ IV. Restrictions on mineral material development in the sub-region would be applied under Alternative D, and for PHMA and GHMA under the Proposed Plan. Acres closed in GHMA would be similar across most alternatives, though Alternative E and the Proposed Plan would have the greatest acres of GHMA closed. The Proposed Plan would provide additional protections to GRSG from mineral material development by requiring anthropogenic disturbance criteria, a 3 percent disturbance cap, RDFs and BMPs, buffers, and mitigation. These closures and restrictions would reduce the effect on GRSG from mineral material development on BLM-administered and National Forest System lands in MZ IV for most action alternatives, particularly the Proposed Plan and Alternative C. However, these actions may shift development onto non-federal lands, with potentially greater impact on GRSG. This is because similar protective stipulations and permit requirements might not apply on those other lands.

**Commented [JMM28]:** Typo for PHMA or undefined Idaho HMA?

Under the Montana Executive Order, authorizations of new mineral material disposal sites that require state agency review or approval would be subject to the GRSG permitting process. They also would be subject to stipulations for development in GRSG Core Areas. These stipulations would be of particular benefit on privately owned surface and subsurface lands, where BLM and Forest Service protective regulatory mechanisms do not apply.

**Commented [JMM29]:** This is not a likely occurrence with this particular plan. The very large majority of surface ownership is federal. Additionally, the development has likely historically already occurred on the private land, therefore, this assessment seems unlikely as a future outcome.

Overall, under the Proposed Plan, the combination of past, present, and reasonably foreseeable future actions for mineral materials development, Montana state actions, planned restoration activities, and other BLM and Forest Service Proposed Plans will provide a net conservation gain to GRSG habitats and populations in MZ IV.

#### *Locatable Minerals*

Nature and Type of Effects. Locatable minerals include gold, silver, uranium, and bentonite. Activities associated with locatable mineral development, such as stockpiling topsoil and extracting and transporting material, would cause mortality and nest disruption. These actions also would reduce the functionality of the surrounding habitat with noise and light disturbance, resulting in lost and degraded GRSG PHMA and GHMA.

As with fluid mineral development, reclamation practices may help to reduce long-term impacts on GRSG and their habitat. Although disturbed areas have not been restored to near pre-disturbance conditions in the past, recent efforts have been directed toward restoring functional habitat. Future reclamation should be focused on restoring habitats capable of supporting viable GRSG populations. Even with effective restoration, restored areas may not support GRSG populations at the same level as prior to disturbance.

Conditions in the Sub-region and in MZ IV. The primary locatable minerals in commercially viable quantities in the Idaho and southwestern Montana sub-region are zeolite and bentonite. Other locatable minerals are known to exist in the sub-region, but they are currently uneconomical to produce.

Impact Analysis. **Table 5-10** provides a quantitative summary of acreages of BLM-administered and National Forest System lands open and recommended for withdrawal from mineral entry across MZ IV.

**Table 5-10**  
**Acres Open and Recommended for Withdrawal from Mineral Entry**  
**in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open to Mineral Entry <sup>2</sup>				
Alternative A	12,307,684	67%	6,406,131	51%
Alternative B	4,006,145	0%	6,157,016	49%
Alternative C	4,006,145	0%	3,124,841	0%
Alternative D	12,307,684	67%	6,406,131	51%
Alternative E	11,705,505	66%	6,796,383	54%
Alternative F	4,006,145	0%	6,641,503	53%
Proposed Plan	9,977,000	69%	6,108,000	34%
Recommended for Withdrawal from Locatable Mineral Entry				
Alternative A	N/A	N/A	N/A	N/A
Alternative B	8,302,000	100%	0	0%
Alternative C	14,390,000	79%	0	0%
Alternative D	N/A	N/A	N/A	N/A
Alternative E	N/A	N/A	N/A	N/A

**Table 5-10  
Acres Open and Recommended for Withdrawal from Mineral Entry  
in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative F	11,339,000	73%	0	0%
Proposed Plan	5,974,000	49%	9,000	98%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. Open with standard stipulations. This table displays the acres of PHMA and GHMA open to mineral entry and recommended for withdrawal from locatable mineral entry in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Alternatives A and E would have similar acres open in PHMA and would not incorporate special mitigation measures for locatable mineral development in GRSG habitat. Locatable mineral mining would continue to affect GRSG through habitat loss and degradation. As a result, Alternative E would not provide any net conservation gain to GRSG compared to Alternative A.

Under Alternatives B, C and F, PHMA would be recommended for withdrawal and applicable BMPs would be mandatory as COAs within PHMA. The most acreage of all the alternatives would be recommended for withdrawal in PHMA. These alternatives would restrict future locatable mineral operations on GRSG habitat more than other alternatives; thus they would provide more protections and conservation gains to GRSG habitat from locatable mineral development.

Under Alternatives D and the Proposed Plan, the BLM and Forest Service would apply reasonable and appropriate RDFs and BMPs as Conditions of Approval to prevent unnecessary or undue degradation of GRSG habitat. The Proposed Plan would also recommend SFAs for withdrawal. Thus, these alternatives would provide a net conservation gain to GRSG.

Under all alternatives, BMPs and RDFs outlined in **Appendix B** would help minimize impacts on GRSG from locatable mineral development on federal land. For example, locating new compressor stations outside of PHMA would reduce noise disturbance. Clustering operations and facilities as close as possible and placing new infrastructure in already disturbed locations would reduce impacts on sagebrush habitats.

The disturbance cap in the Proposed Plan would not block locatable mineral entry projects, but any locatable mineral entry would be considered as

disturbance under the cap. Overall, the measures in the Proposed Plan would help alleviate the threat, and combined with state plans, other BLM and Forest Service proposed plans in MZ IV, and other past, present, and reasonably foreseeable future actions, would provide a net conservation gain to GRSG habitats and populations throughout MZ IV.

*Nonenergy Leasable Minerals*

Nonenergy leasable minerals are materials such as [phosphate](#), sulfates, silicates, and trona (sodium carbonate). Impacts on GRSG are similar to those from other types of mining.

Conditions in the Sub-region and in MZ IV. Existing leases for nonenergy leasable minerals represent a relatively small threat spatially, as 12,000 acres (less than 1 percent) of GRSG habitats in MZ IV are directly affected by existing prospecting permits (Manier et al. 2013, p. 71). Phosphate development is prevalent in southeastern Idaho, though acres disturbed are not known (**Section 3.12**).

Impact Analysis. **Table 5-11** provides a quantitative summary of acreages of BLM-administered and National Forest System lands open and closed to nonenergy leasable mineral leasing across MZ IV.

**Table 5-11**

**Acres Open and Closed to Nonenergy Leasable Mineral Leasing in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open to Nonenergy Leasing <sup>2</sup>				
Alternative A	7,886,000	100%	6,022,000	54%
Alternative B	0	0%	3,831,000	28%
Alternative C	0	0%	2,771,000	0%
Alternative D	6,000	100%	6,019,000	54%
Alternative E	7,220,000	100%	6,501,000	57%
Alternative F	0	0%	3,837,000	28%
Proposed Plan	0	0%	8,408,000	67%
Closed to Nonenergy Leasing				

**Table 5-11**

**Acres Open and Closed to Nonenergy Leasable Mineral Leasing in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Alternative A	8,039,000	11%	744,000	36%
Alternative B	15,925,000	55%	717,000	33%
Alternative C	19,188,000	63%	478,000	0%
Alternative D	15,919,000	55%	744,000	36%
Alternative E	8,068,000	11%	691,000	31%
Alternative F	15,925,000	55%	746,000	36%
Proposed Plan	12,859,000	44%	1,748,000	73%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA open and closed to nonenergy leasing in MZ IV; it also displays the percentage of those acres that are found within the planning area.

Alternatives B, C, D, F and the Proposed Plan would increase the acreage of PHMA closed to nonenergy leasing compared to current management (Alternative A) and Alternative E. The alternatives would provide fewer protections in GHMA, though the Proposed Plan would increase the acres closed to nonenergy leasing. The Proposed Plan would provide additional protections compared to the other action alternatives by requiring anthropogenic disturbance criteria, a 3 percent disturbance cap, buffers, RDFs and BMPs, and mitigation.

In combination with the disturbance cap applied under the Montana state plan, other BLM and Forest Service proposed plans in MZ IV, and other past, present, and reasonably foreseeable future actions, the Proposed Plan represents an increase in GRSG habitat protections in MZ IV and a net conservation gain to GRSG habitats and populations.

**Recreation**

Nature and Type of Effects. Recreation, such as camping, bicycling, wildlife viewing, horseback riding, fishing, and hunting, can be dispersed; concentrated, such OHV use and developed campsites; and permitted, such as via BLM Special



Recreation Permit and Forest Service Special Use Permit. The BLM also manages Special Recreation Management Areas (SRMAs) where recreation is a primary resource management consideration.

Recreation on federally administered lands that use the extensive network of double-track and single-track routes have an impact on sagebrush and GRSG. Ecological impacts of roads and motorized trails are mortality due to collisions; behavior modifications due to noise, activity, and habitat loss; alteration of physical environment; nutrient leaching; erosion; invasive plants spread; increased use; and alteration by humans due to accessibility (Knick et al. 2011, p. 219). Recreation activities can degrade GRSG habitat through direct impacts on vegetation and soils, introduction or spread of invasive species, and habitat fragmentation. This occurs in areas of concentrated use, trailheads, staging areas, and routes and trails.

Motorized activities, including OHV use, are expected to have a larger footprint on the landscape. They are anticipated to have the greatest level of impact due to noise levels, compared to nonmotorized uses, such as hiking or equestrian use. Cross-country motorized travel, which is permitted in designated areas on BLM-administered lands but not National Forest lands, would increase the potential for soil compaction, perennial grasses and forbs loss, and reduce sagebrush canopy cover. Losses in sagebrush canopy could be the result of repeated, high frequency, cross-country OHV use over long periods. In addition, the chances of wildfire are increased during the summer, when fire dangers are high and recreation is at its highest.

Dispersed uses expand the human footprint. Closing areas to recreation and reclaiming unused, minimally used, or redundant roads in and around sagebrush habitats during seasonal use by GRSG may reduce the footprint and presumably impacts on wildlife. Restricting access to important habitat areas during seasonal use (lekking, nesting, brood-rearing, and wintering) may decrease the impacts associated with humans. However, access restriction will not eliminate other impacts, such as invasive plant spread, predator movements, cover loss, and erosion (Manier et al. 2013, p. 108).

Conditions in the Sub-region and in MZ IV. Human populations have increased and expanded, primarily over the past century and in the western portion of the sagebrush distribution (Knick et al. 2011, p. 212). With these expanding populations come greater human impacts (Leu et al. 2008).

The COT report objectives for recreation are to maintain healthy native sagebrush communities, based on local ecological conditions, and to manage direct and indirect human disturbance (including noise) to avoid interruption of normal GRSG behavior (USFWS 2013, p. 49). Limits on road use under the action alternatives and limits on OHVs would help meet these objectives.

In the Idaho and southwestern Montana sub-region, travel management planning is underway to determine specific routes available for closure.

Impact Analysis. **Table 5-12** shows Acres of Travel Management Designations in GRSG Habitat in MZ IV.

**Table 5-12**  
**Acres of Travel Management Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
Open				
Alternative A	2,236,000	100%	671,000	100%
Alternative B	1,000	100%	671,000	100%
Alternative C	0	0%	0	0%
Alternative D	1,000	100%	1,000	100%
Alternative E	1,833,000	100%	1,083,000	100%
Alternative F	1,000	100%	255,000	100%
Proposed Plan	0	0%	1,000	100%
Limited				
Alternative A	11,943,000	44%	5,123,000	44%
Alternative B	14,179,000	52%	4,921,000	42%
Alternative C	16,906,000	60%	2,866,000	0%
Alternative D	14,179,000	52%	5,793,000	51%
Alternative E	11,804,000	43%	5,092,000	44%
Alternative F	14,179,000	52%	5,824,000	51%
Proposed Plan	11,340,000	41%	8,630,000	67%

**Table 5-12  
Acres of Travel Management Designations in GRSG Habitat in MZ IV**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ IV	Percent Within Planning Area	MZ IV	Percent Within Planning Area
	Closed			
Alternative A	824,000	90%	194,000	89%
Alternative B	824,000	90%	183,000	87%
Alternative C	984,000	91%	23,000	0%
Alternative D	824,000	90%	194,000	89%
Alternative E	785,000	89%	224,000	90%
Alternative F	824,000	90%	196,000	89%
Proposed Plan	640,000	87%	177,000	87%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA within travel management designations of open, limited and closed in MZ IV; it also displays the percentage of those acres that are found within the planning area.

As shown in **Table 5-12**, there are slight variations among alternatives in acres closed and limited to motorized vehicles in both PHMA and GHMA. However, the action alternatives would reduce acres open in PHMA, particularly Alternatives C and the Proposed Plan, under which no acres would be open to motorized vehicles. There would be a similar reduction in GHMA except under Alternative E where more acres would be open compared to current management. As a result of travel management planning, impacts on GRSG from recreational motorized vehicle use would be greatest under Alternatives A and E; impacts would be reduced most under Alternative C and the Proposed Plan.

For recreation, Alternatives B, D, and the Proposed Plan would aim to reduce impacts on GRSG with issuance of SRPs and SUPs. Alternative F would take a similar approach, but with the addition of seasonal restrictions within 4 miles of active leks. Alternatives A, C, and E would not manage recreation to reduce impacts on GRSG.

Implementation of the recreation-related action alternatives described above, in concert with travel management planning on BLM-administered lands within MZ IV, limitations on National Forest System lands the disturbance caps applied

under state plans, and other past, present, and reasonably foreseeable future actions, would help reduce the threats from recreation and travel on GRSG habitats and would provide a net conservation gain to GRSG populations in MZ IV.

**5.1.7 Existing Conditions in WAFWA MZs II/VII**

This section summarizes existing conditions and past and present actions for the Idaho and southwestern Montana sub-region (provided in more detail in **Chapter 3**) and for MZs II/VII as a whole.

*GRSG Habitat and Populations*

MZs II/VII consist of eleven GRSG populations: Eagle-South Routt, Middle Park, Laramie, Jackson Hole, Wyoming Basin, Rich-Morgan-Summit, Uintah, North Park, Northwest Colorado, Parachute-Piceance-Roan Basin, and Meeker-White River (Garton et al. 2011). The sub-region includes the Wyoming Basin population. Leks in the northern portion of MZs II/VII are the most highly connected in the range (Knick and Hanser 2011); populations in southern portions of MZ II/VII (the Colorado Plateau) are less robust, with low lek connectivity and a 96 percent chance of populations declining below 200 males by 2037 (Garton et al. 2011; Knick and Hanser 2011). MZs II/VII include GRSG populations in Idaho, Montana, Wyoming, Utah, and Colorado.

In MZs II/VII, BLM-administered, National Forest System and other federal lands account for over 20 million acres of GRSG habitat (approximately 58 percent of habitat), with state and private lands accounting for approximately 16 million acres of GRSG habitat (approximately 44 percent of habitat) (Manier et al. 2013, p. 118). This indicates the importance of conservation and restoration on both private and public lands.

**Table 5-13** provides a breakdown of landownership and acres of GRSG habitat in MZs II/VII. As the table shows, approximately 52 percent of PPHMAPPH and 47 percent of PGHMAPGH is on BLM-administered lands. Less than one percent of PPHMAPPH and 2 percent of PGHMAPGH is on National Forest System lands. The remaining 18,028,000 million acres (49 percent) of GRSG habitat in the MZs comprise private, local state, and other federal and tribal lands. Acres in these and other tables are rounded to the nearest 1,000 acres. Values of less than 1,000 acres are presented as 0 acres.

**Table 5-13**  
**Management Jurisdiction in MZs II/VII by Acres of Priority and General Habitats**  
**(PPHMAPPH and PGHMAPGH)**

Total Surface Area (Acres)	PPHMAPPH (Acres)	PGHMAPGH (Acres)	Non-habitat (Acres)
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**Table 5-13**  
**Management Jurisdiction in MZs II/VII by Acres of Priority and General Habitats**  
**(PPHMAPPH and PGHMAPGH)**

	<b>Total Surface Area (Acres)</b>	<b>PPHMAPPH (Acres)</b>	<b>PGHMAPGH (Acres)</b>	<b>Non-habitat (Acres)</b>
<b>MZ IV</b>	92,776,100 (100%)	17,476,000 (19%)	19,200,200 (21%)	56,099,900 (60%)
BLM	30,295,000 (33%)	9,021,200 (30%)	9,012,500 (30%)	12,261,300 (40%)
Forest Service	23,558,800 (25%)	162,000 (<1%)	452,500 (2%)	22,944,300 (97%)
Tribal and other federal	7,086,200 (8%)	784,000 (11%)	1,354,600 (19%)	4,947,600 (70%)
Private	27,405,400 (30%)	6,233,900 (23%)	7,394,800 (27%)	13,776,700 (50%)
State	4,053,900 (4%)	1,244,800 (31%)	979,800 (24%)	1,829,300 (45%)
Other	376,700 (<1%)	30,100 (8%)	6,000 (2%)	340,600 (90%)

Source: Manier et al. 2013, p. 118

A very small percentage—approximately one tenth of one percent—of PHMA and GHMA in MZs II/VII are located on BLM-administered and National Forest System lands in the Idaho and southwest Montana sub-region. As a result, BLM and Forest Service management in this sub-region would have very little influence on GRSG across the broader MZs II/VII. BLM and Forest Service management in this sub-region would be most effective at conserving a portion of the Wyoming Basin population; it would have little or no effect on other populations in the MZs. Because past, present, and reasonably foreseeable future actions do not vary by alternative, the incremental effect of implanting any of the Idaho and southwest Montana LUPA alternatives on GRSG in MZs II/VII would vary little across the range of alternatives.

*Population Trends in Management Zones II/VII*

The Wyoming Basin population within MZs II/VII is the largest population in the GRSG range with over 20,000 males attending leks annually. Although recent data suggests a population increase, long-term monitoring is trending downward and population modeling suggests this trend will continue (Garton et al. 2011).

Wyoming data suggest a cyclic pattern with population lows in 1995, 2002 and 2013 and peaks in 2000 and 2006. Actual trends are difficult to discern due to the lower survey effort prior to 2007, meaning the number and proportion of

active/inactive leks is unknown. Since 2007, the number of active leks has remained stable (approximately 1,100 active leks), but the number of males/active lek has declined by more than half (from 42 to 17 males/lek). In northeast Wyoming, the decreasing number of active leks since 2007 suggests a population decline in that area, greater than that indicated by the average lek size. Similar population trends are suggested at both state and local scales (Christiansen 2013).

**Commented [JMM30]:** It is inappropriate to compare the NE Wyoming population to any outside of MZ I. Delete.

The isolation of many other populations on the fringes of MZs II/VII makes them particularly vulnerable to habitat loss and fragmentation. The Wyoming Basin population within Wyoming and extending into the sub-region is at risk due to renewable and non-renewable energy development, long-term drought, and brush eradication programs (USFWS 2013, p. 68).

#### **5.1.8 Regional Efforts to Manage Threats to GRSG in MZs II/VII**

There are several regional efforts to manage threats to GRSG in MZs II/VII. These efforts may have a strong influence in alleviating threats to GRSG than BLM and Forest Service actions alone. This is because state and private lands account for approximately 16 million acres (approximately 44 percent) of GRSG habitat in MZs II/VII (Manier et al. 2013, p. 118).

##### *Idaho Statewide Efforts*

Idaho statewide efforts are as described in **Section 5.1.4**.

##### *Montana Statewide Efforts*

Montana statewide efforts are as described in **Section 5.1.4**.

##### *Natural Resource Conservation Service Sage Grouse Initiative*

The NRCS SGI is as described in **Section 5.1.4**. As of 2014, the most recent year for which data are available, SGI has secured conservation easements on 243,403 acres within MZs II/VII (NRCS 2015).

##### *Wyoming Statewide Efforts*

Wyoming has established Core Population Areas to help delineate landscape planning units by distinguishing areas of high biological value. These areas are based on the locations of breeding areas and are intended to help balance GRSG habitat requirements with demand for energy development (Doherty et al. 2011).

In 2000, the Wyoming Sage-Grouse Working Group (WSGWG) was formed to develop a statewide strategy for GRSG conservation. This group prepared the Wyoming GRSG Conservation Plan (WSGWG 2003) to provide coordinated management and direction across the state. In 2004, local GRSG working groups were formed to develop and implement local conservation plans. Eight local working groups around Wyoming have completed conservation plans, many of which prioritize addressing past, present, and reasonably foreseeable threats at state and local levels, and prescribe management actions for private

landowners to improve GRSG conservation at the local scale, consistent with the overall Wyoming Core [Area Strategy](#).

Wyoming Executive Order. Wyoming Governor Matt Mead issued an executive order on June 2, 2011, that complemented and replaced several executive orders issued by his predecessor. The 2011 Wyoming ~~eExecutive Order~~ articulates Wyoming's Core Population Area Strategy (Core Area Strategy) as an approach to balancing GRSG conservation and development. It also provides an approach to mitigating human disturbances to GRSG. The USFWS believes that Wyoming's Core Area Strategy, if extended to all landowners via regulatory mechanisms, would provide adequate protection for GRSG and its habitat (USFWS 2010); however, universal implementation remains uncertain due to the variety in landownership and management (Manier et al. 2013).

The Wyoming ~~eExecutive Order~~ applies to state trust lands starting in 2008. These trust lands cover almost 23 percent of GRSG habitat and benefit approximately 80 percent of the estimated breeding population in the state (USFWS 2010). All proposed activities are evaluated through a density/disturbance calculation tool to determine if the project would exceed recommended density/disturbance thresholds. Additionally, the order has stipulations to be included in permits, with varying restrictions depending on whether the proposed development activity occurs within or outside delineated Core Population Areas (Wyoming Executive Order, June 2, 2011).

In Core Areas, there is a 0.6-mile no surface occupancy (NSO) buffer around occupied leks, [density restrictions of one location per 640 acres, a disturbance cap of 5%](#), and restrictions on activities in breeding and winter concentration habitat. ~~Wyoming's Industrial Siting Council, which permits large development projects on all lands in the state, is subject to the terms of the executive order.~~ This buffer provides protection for males during lekking season and acts in coordination with the density disturbance cap. The combination of protections could offer GRSG considerable regulatory protection when [large wind energy](#) and other development projects are being considered in Wyoming (USFWS 2010; Manier et al. 2013).

Statewide modeling of trends under the Core Area Strategy suggests that with effective enforcement statewide, the strategy could reduce population losses by 9 to 15 percent across Wyoming. Moreover, the number of Core Areas predicted to maintain 75 percent of their current populations could increase from 20 to 25 under long-term scenarios (Copeland et al. 2013). Combining the Core Area Strategy with \$250 million in target conservation easements (provided willing landowners and funding are available) could reduce population declines by another 9 to 11 percent (Copeland et al. 2013).

**Commented [JMM31]:** At present, the WY EO does not allow wind energy development inside Core Areas unless they can prove no adverse effects to sage-grouse. I think that is more important of a distinction here than the remainder of the limitations outlined in the WY EO.

*Colorado Statewide Efforts*

In 2008, the Colorado Division of Wildlife (now Colorado Parks and Wildlife) developed a state conservation plan, which prioritized threats and identified key issues facing conservation. The plan included issues, objectives, and strategies in detail. The strategies for conservation discussed responsible parties, lead agency, timeline, and cost associated with implementation of the strategy.

**Commented [JMM32]:** Before moving on to other State's efforts, please add additional efforts to Wyoming's write up equivalent to what is being included for the other states: Wyoming Habitat Exchange (also under development, Sweetwater River Conservancy's Greater Sage-grouse Habitat Bank, Wyoming Landscape Conservation Initiative, Powder River Restoration Initiative, etc.

In 2012, a state conservation plan revision process began, and in consultation with stakeholders, a matrix summarizing implementation and effectiveness of the strategies was developed (Colorado Package), along with a subsequent Synthesis Report. The Colorado Package identified a number of conservation efforts within Colorado which have resulted in positive impacts to GRSG including acquisition of conservation easements and habitat improvement projects (Colorado Department of Natural Resources 2013). The Synthesis Report provided additional information on the effectiveness of conservation efforts such as county zoning ordinances which support protection of GRSG habitat, and measures from the Colorado State Board of Land Commissioners which will support adaptive management techniques to improve GRSG habitat (Colorado Department of Natural Resources 2014). Additional statewide conservation measures as described in the Synthesis Report include the Colorado Habitat Exchange (under development), which creates incentives for landowners to reduce impact, as well as conserve, enhance, and restore critical habitat.

**Commented [JMM33]:** This should be deleted or equal discussion should be given to the same effort in Wyoming with the Wyoming Habitat Exchange (also under development)

*Utah Statewide Efforts*

The Conservation Plan for Greater Sage-grouse in Utah (2013) was designed to protect, enhance, and restore GRSG habitat, in an effort to reduce the threats to the species. The plan identifies 11 GRSG management areas throughout the state (including lands within MZs II/VII), which represent areas of high habitat value. The plan calls for state and local efforts to obtain incentive-based negotiated covenants, easements, leases or other legal tools in order to protect habitat. Additionally, the plan identifies a five percent disturbance limitation of habitat on state or federally managed lands, intended to limit the effects of large scale disturbances.

*Other Regional Efforts*

Other regional efforts are as described in **Section 5.1.4**.

**5.1.9 Relevant Cumulative Actions**

This cumulative effects analysis considers past, present, and reasonably foreseeable future actions on other federal, state, tribal, local, and private lands in MZs II/VII. Where these actions interface with GRSG habitat, they would cumulatively add to the impacts of BLM- and Forest Service-authorized activities.



The following list includes past, present, and future actions in MZs II/VII that could cumulatively affect GRSG (more detail is included in the table in Appendix A):

- Pinedale Anticline Project, Wyoming
- Hiawatha Regional Energy Development Project, Wyoming, Colorado
- Oil Shale and Tar Sands Programmatic EIS, Wyoming, Colorado, Utah
- Gateway South Transmission Project, Wyoming, Colorado, Utah
- TransWest Express Transmission Line Project, Wyoming, Colorado, Utah, Nevada
- Gateway West Transmission Line Project, Wyoming, Idaho
- Riley Ridge to Natrona Pipeline Project, Wyoming
- Invasive Plant Management EIS, Wyoming, Colorado

#### 5.1.10 Threats to GRSG in Management Zones II/VII

In its COT report, the USFWS identifies energy development, infrastructure, grazing/free-roaming equids, conversion to agriculture, fire, spread of weeds, recreation, and conifers as the present and widespread threats facing GRSG in MZs II/VII (USFWS 2013, pp. 17-19, 27-28). Each threat is discussed below.

##### ***Energy Development and Mining***

The COT report states that energy development should be designed to ensure that it will not impinge on stable or increasing GRSG population trends. For mining, the objective is to maintain stable to increasing GRSG populations and no net loss of GRSG habitats in areas affected by mining (USFWS 2013, p. 49).

There are approximately 1,144,800 acres of GRSG habitat in MZs II/VII where energy and mineral development is presently occurring. There are over 30 million acres indirectly influenced by energy development (including oil and gas, coal leasing, mineral materials, and renewables) (Manier et al. 2013, pp. 52-71). No geothermal energy development is presently occurring in MZs II/VII. Indirect influences are overwhelmingly due to oil and gas leases. Of the 80 percent of GRSG habitat in MZ II/VII indirectly influenced by oil and gas development, approximately 50 percent occurs on BLM-administered land, with most of the remainder on private lands (Manier et al. 2013, p. 52). Only 1 percent of oil and gas development affects National Forest System lands. Approximately 7 percent of federal lands are closed to oil and gas leasing, but the majority of leased lands are presently undeveloped. BLM and Forest Service regulatory actions would primarily influence unleased areas by way of attaching stipulations, conditions of approval, and other conservation measures on future leases.

##### ***Oil and Gas***

Nature and Type of Effects. The impacts of oil and gas development on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Forty-four percent of the 39-million acre federal mineral estate in MZs I and II is leased and authorized for

**Commented [JMM34]:** The list in the MZ II/VII document is this:

- Hiawatha Regional Energy Development EIS
- LaBarge Platform Exploration & Development Project
- Continental Divide-Creston Natural Gas Project
- Moneta Divide Natural Gas and Oil Development Project
- Pinedale Anticline Project
- Black Fork Project (Formerly Moxa Arch Area Infill)
- Oil Shale and Tar Sands Programmatic EIS
- Atlantic Rim Natural Gas Field Development Project
- Chokecherry Sierra Madre Wind Farm
- Gateway South Transmission Line Project
- TransWest Express Transmission Line Project
- Gateway West Transmission Line Project
- Riley Ridge o Natrona Pipeline Project
- Invasive Plan Management EIS for the Medicine Bow – Routt National Forests, and Thunder Basin National Grassland

Compare and edit to be consistent.

exploration and development (Naugle et al. 2011). The Greater Green River Basin, Uintah-Piceance Basin, and North Park Basin are all important oil and gas reserves in MZs II/VII. In Wyoming, which contains the bulk of the mineral estate, 52 percent is authorized for development (Naugle et al. 2011). There are two leases on the Bear Lake Plateau within the sub-region but there has been no oil and gas development.

Approximately 15 percent of GRSG habitat in MZs II/VII is within 1.8 miles of oil and gas wells (Knick et al. 2011, p. 240). Oil and natural gas development-related wells indirectly influence over 50 percent of PPHMAPPH and PGHMAPGH on BLM-administered lands across MZs II/VII, occurring to a distance of 12 miles from the development. There are virtually no indirect impacts on National Forest System lands. Private surface lands account for 33 percent of the indirect impact in PPHMAPPH and 37 percent in PGHMAPGH in MZs II/VII (Manier et al. 2013, p. 52). Thus, actions on BLM-administered land are likely to have a greater potential to ameliorate the effects of oil and gas development than any other single land management entity.

Though the BLM and Forest Service may restrict future leasing for oil and gas on BLM-administered and National Forest System lands within GRSG habitat, existing leases remain valid with potential for development based on locations of geologic fields for traditional oil and gas distributed extensively across eastern portions of GRSG range (Manier et al. 2013, p. 51). Oil and gas reserves are extensive across the Powder River Basin of northeastern Wyoming and southeastern Montana; the Wyoming Thrust Belt of extreme southwestern Wyoming, and the Southwest Wyoming Basin including portions of southwestern and central Wyoming. The Southwestern Wyoming and the Uinta-Piceance geological basins are both located partly in MZs II/VII, and coincide with high-density areas of GRSG, large numbers of leks, and the highest male attendance at leks compared with any areas in the eastern part of the range (USFWS 2010).

According to the RFD scenario (Appendix X), permanent disturbance associated with oil and gas development is projected to occur on 156 acres within the sub-region over the next 10 years. The potential for impacts would be reduced where areas are closed to fluid mineral leasing and where NSO and CSU/TL stipulations are applied. Given the small acreage and implementation of RFDs and BMPs (Appendix B), the likelihood for impacts on GRSG habitat on BLM-administered and National Forest System lands in the planning area is anticipated to be small and localized under all alternatives.

Impact Analysis. **Tables 5-14** and **5-15** provide a quantitative summary of fluid mineral leasing conditions on BLM-administered and National Forest System lands across MZs II/VII, followed by an analysis of the Idaho and southwestern Montana sub-regional alternatives.

**Table 5-14**  
**Acres Open\* and Closed to Fluid Mineral Leasing in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open <sup>2</sup> to Fluid Mineral Leasing				
Alternative A	30,000	100%	2,401,000	1%
Alternative B	0	0%	2,382,000	0%
Alternative C	0	0%	2,378,000	0%
Alternative D	0	0%	2,378,000	0%
Alternative E	0	0%	2,384,000	0%
Alternative F	0	0%	2,382,000	0%
Proposed Plan	0	0%	2,378,000	0%
Closed to Fluid Mineral Leasing				
Alternative A	1,307,000	1%	1,170,000	1%
Alternative B	1,358,000	5%	1,166,000	0%
Alternative C	1,368,000	6%	1,164,000	0%
Alternative D	1,340,000	4%	1,170,000	1%
Alternative E	1,308,000	1%	1,166,000	0%
Alternative F	1,358,000	1%	1,166,000	0%
Proposed Plan	1,290,000	0%	1,165,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard lease terms and conditions. This table displays the acres of PHMA and GHMA open and closed to fluid mineral leasing in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

**Table 5-15**  
**Acres with NSO and CSU/TL Stipulations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas	General Habitat Management Areas <sup>1</sup>
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**WORKING DRAFT DO NOT CITE OR CIRCULATE** 5. Cumulative Impacts (Greater Sage-Grouse)

	<b>MZ II/VII</b>	<b>Percent Within Planning Area</b>	<b>MZ II/VII</b>	<b>Percent Within Planning Area</b>
<b>NSO Stipulations</b>				
Alternative A	4,415,000	0%	1,254,000	0%
Alternative B	4,393,000	0%	1,254,000	0%
Alternative C	4,393,000	0%	1,251,000	0%
Alternative D	4,397,000	0%	1,256,000	0%
Alternative E	4,442,000	1%	1,256,000	0%
Alternative F	4,393,000	0%	1,254,000	0%
Proposed Plan	4,442,000	1%	1,281,000	1%
<b>CSU/TL Stipulations</b>				
Alternative A	5,407,000	0%	6,955,000	0%
Alternative B	5,407,000	0%	6,955,000	0%
Alternative C	5,407,000	0%	6,955,000	0%
Alternative D	5,421,000	0%	6,977,000	0%
Alternative E	5,407,000	0%	6,955,000	0%
Alternative F	5,407,000	0%	6,955,000	0%
Proposed Plan	5,407,000	0%	6,957,000	<1%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA with NSO Stipulations and CSU/TL Stipulations in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Acres open, closed, and with stipulations for fluid mineral leasing do not vary substantially across alternatives, as the acres in **Tables 5-14 and 5-15** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres open, closed, or with stipulations. As shown in **Tables 5-14 and 5-15**, any action alternative for fluid mineral leasing in the Idaho and southwestern Montana LUPA would affect 6 percent or less of GRSG habitat within MZs II/VII.

Implementing any alternative under the Idaho and southwestern Montana LUPA/EIS would not affect pending or future oil and gas development projects outside of the sub-region. For example, numerous oil and gas development projects are proposed in Wyoming (Appendix A). However, the NSO buffer and the disturbance cap under the Wyoming Executive Order would reduce the threat to GRSG from oil and gas development on non-federal lands in MZs II/VII.

All BLM and Forest Service Proposed Plans within MZs II/VII include BMPs and RDFs to minimize impacts on GRSG from oil and gas development on federal lands. Examples include: locating new compressor stations outside of PHMA to reduce noise disturbance; clustering operations and facilities as closely as possible; placing infrastructure in already disturbed locations where the habitat has not been fully restored; and restoring disturbed areas at final reclamation to the pre-disturbance landforms and desired plant communities. State plans contain similar measures to reduce impacts. Together, these measures would help protect unfragmented habitats, minimize habitat loss and fragmentation, and maintain conditions that meet GRSG life history needs. Recent research indicates that restored habitats lack many of the features sought by GRSG in their habitat areas, and may not support GRSG for long periods following restoration activities. In order to conserve GRSG populations on the landscape, protection of existing habitat through minimizing development, would provide the best hope for GRSG persistence (Arkle et al. 2014).

Overall, the Montana and Wyoming state actions, such as the disturbance cap, planned restoration activities, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from fluid minerals management regardless of management within the Idaho and southwestern Montana sub-region.

#### *Coal*

While coal is the major mining activity in GRSG habitat (Braun 1998), there is no potential for coal within the sub-region. Coal mines are widespread in southern portions of MZs II/VII, and federal leases developed through surface extraction directly influence approximately 52,100 acres of these MZs. There is the potential for additional coal mining in large portions of PPHMAAPP and PGHMAPGH in MZs I, II, and VII. Indirect effects of surface coal mines suggest influence over approximately 8 percent of PPHMAAPP across the range of the species and approximately 5 percent of PPHMAAPP in MZs II/VII. Approximately 36 percent of PPHMAAPP that is indirectly influenced by coal mines across the species' range are managed by BLM. Although coal companies have demonstrated that disturbed lands can be restored to a point that supports a diversity of vegetative species, including big sagebrush, there is little evidence that GRSG populations have reoccupied habitat disturbed by coal mining, at least in terms of lek establishment (Manier et al. 2013, pp. 70-71, 74).

Coal development is also managed at the state level. For example, coal development that requires state agency review or approval would be subject to the permitting process and stipulations for development in GRSG Core areas under the Wyoming ~~eExecutive eOrder, executive order~~. Additionally, new coal leases applications on federal lands would be subject to 43 CFR, Part 3461.5, Criterion 15. This states that a lease may be issued if, after consultation with the state, the surface management agency determines that all or certain stipulated methods of coal mining would not have a significant long-term impact on the GRSG. Special conditions could be required, as identified during the leasing process, to protect GRSG habitat. The requirements of 43 CFR, Part 3461.5, Criterion 15, in combination with BLM and Forest Service planning efforts and state plans, would help reduce the threat from coal extraction and would provide a net conservation gain to GRSG habitats and populations in MZs II/VII.

*Mineral Materials*

Nature and Type of Effects. The impacts of mineral material development on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. There are 846,600 acres of mining and mineral materials disposal sites (not including minerals mined as energy sources) on BLM-administered surface land on **PPHMAPPH** and **PGHMPPGH** in MZs II/VII. There are 1,027,500 acres across all landownership types, making BLM-administered land the largest contributor to direct effects from this threat. National Forest System lands contribute to direct effects on 3,100 acres of **PPHMAPPH** and **PGHMPPGH** (Manier et al. 2013, p. 77).

Indirect effects are estimated to 1.5 miles out from the direct effects area. In total, 65 percent of **PPHMAPPH** and 60 percent of **PGHMPPGH** influenced by the indirect impact of mining and mineral materials disposal sites are on BLM-administered land. This does not include minerals mined as energy sources. Mining and mineral materials disposal sites on private land, by comparison, indirectly affect 26 percent of **PPHMAPPH** and 32 percent of **PGHMPPGH**. National Forest System lands have virtually no indirectly effects on **PPHMAPPH** and **PGHMPPGH** (Manier et al. 2013, p. 77). As a result, management of mining and material disposal sites on BLM-administered land would have the greatest impact on GRSG habitat conditions.

Impact Analysis. Acres open and closed to mineral material disposal do not vary substantially across alternatives, as the acres in **Table 5-16** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres open or closed. As shown in **Table 5-16**, any alternative for mineral

materials management in the Idaho and southwestern Montana LUPA would affect 2 percent or less of GRSG habitat within MZs II/VII.

**Table 5-16**  
**Acres Open and Closed to Mineral Material Disposal in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open to Mineral Material Disposal <sup>2</sup>				
Alternative A	7,249,000	1%	9,762,000	0%
Alternative B	7,181,000	0%	9,740,000	0%
Alternative C	7,181,000	0%	9,730,000	0%
Alternative D	7,222,000	1%	9,758,000	0%
Alternative E	7,247,000	1%	9,743,000	0%
Alternative F	7,181,000	0%	9,740,000	0%
Proposed Plan	7,181,000	0%	9,762,000	0%
Closed to Mineral Material Disposal				
Alternative A	3,446,000	0%	1,390,000	0%
Alternative B	3,514,000	2%	1,390,000	0%
Alternative C	3,524,000	2%	1,390,000	0%
Alternative D	3,473,000	1%	1,394,000	0%
Alternative E	3,446,000	0%	1,390,000	0%
Alternative F	3,514,000	2%	1,390,000	0%
Proposed Plan	3,495,000	1%	1,390,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA open and closed to mineral material disposal in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Reasonably foreseeable future mineral material disposals in MZs II/VII could affect GRSG through habitat disturbance, fragmentation, or behavior disruptions, depending on the location and extent of the project; however, implementation of BLM and Forest Service Proposed Plans in other areas of MZs II/VII would restrict development, thereby reducing the risk of removing or fragmenting habitat elsewhere in MZs II/VII, particularly on federal lands. There would be a net conservation gain to GRSG habitats and populations in MZs II/VII, but it would be concentrated in areas outside the Idaho and southwestern Montana sub-region.

Under the Wyoming and Montana Executive Orders, authorizations of new mineral material disposal sites that require state agency review or approval would be subject to the GRSG permitting process. They also would be subject to stipulations for development in GRSG Core areas. These stipulations would be of particular benefit on privately owned surface and subsurface lands, where BLM and Forest Service protective regulatory mechanisms do not apply.

Overall, the Montana and Wyoming state actions, such as the disturbance cap, planned restoration activities, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from mineral materials management regardless of management within the Idaho and southwestern Montana sub-region.

*Locatable Minerals*

Nature and Type of Effects. The impacts of locatable mineral development on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZ II/VII. The magnitude of existing conditions in the sub-region is largely unknown, but mining of locatable federal mineral resources currently affects approximately 2.2 percent of GRSG habitat in MZs II/VII (Manier et al. 2013, p. 74).

Impact Analysis. Under all alternatives, BMPs and RDFs in all BLM and Forest Service Proposed Plans would help minimize the impacts on GRSG from locatable mineral development on federal land. Examples include: locating new compressor stations outside of PHMA to reduce noise disturbance; clustering operations and facilities as closely as possible; placing infrastructure in already disturbed locations where the habitat has not been fully restored; and restoring disturbed areas at final reclamation to the pre-disturbance landforms and desired plant communities.

Acres open and recommended for withdrawal from locatable mineral entry do not vary substantially across alternatives, as the acres in **Table 5-17** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of



the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres open or recommended for withdrawal. As shown in **Table 5-17**, any alternative for locatable minerals management in the Idaho and southwestern Montana LUPA would affect 7 percent or less of GRSG habitat within MZs II/VII. The greatest impacts would result under Alternatives B, C, and F, where PHMA in the Idaho and southwestern Montana sub-region would be recommended for withdrawal.

**Table 5-17**  
**Acres Open and Recommended for Withdrawal from Mineral Entry**  
**in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open to Mineral Entry <sup>2</sup>				
Alternative A	8,204,000	1%	8,932,000	0%
Alternative B	8,140,000	0%	8,914,000	0%
Alternative C	8,140,000	0%	8,905,000	0%
Alternative D	8,204,000	1%	8,932,000	0%
Alternative E	8,202,000	1%	8,917,000	0%
Alternative F	8,140,000	0%	8,914,000	0%
Proposed Plan	8,190,000	1%	8,940,000	0%
Recommended for Withdrawal from Locatable Mineral Entry				
Alternative A	N/A	N/A	N/A	N/A
Alternative B	957,000	7%	235,000	0%
Alternative C	965,000	7%	235,000	0%
Alternative D	N/A	N/A	N/A	N/A

**Table 5-17  
Acres Open and Recommended for Withdrawal from Mineral Entry  
in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative E	N/A	N/A	N/A	N/A
Alternative F	957,000	7%	235,000	0%
Proposed Plan	893,000	0%	235,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. Open with standard stipulations. This table displays the acres of PHMA and GHMA open to mineral entry and recommended for withdrawal from locatable mineral entry in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Under the Proposed Plans, all SFAs would be recommended for withdrawal. SFAs represent areas having the highest densities of GRSG and other criteria important for the persistence of the species. As such, if these areas are withdrawn, the Proposed Plan would provide a greater net conservation gain to GRSG populations by reducing disturbance to birds from mining. However due to the sub-region containing such a small percentage of GRSG habitat within the larger MZs, the impact of the sub-region would be limited. Together, the Montana and Wyoming state actions, planned restoration activities, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from locatable materials management regardless of management within the Idaho and southwestern Montana sub-region.

*Nonenergy Leasable Minerals*

Nature and Type of Effects. The impacts of nonenergy leasable mineral development on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Existing prospecting permits for nonenergy leasable minerals directly affect 935,500 acres (2.5 percent) of GRSG habitats in MZs II/VII, which is the largest proportion of GRSG habitat compared with the other MZs (Manier et al. 2013, p. 79). Phosphate development is prevalent in southeastern Idaho, though acres disturbed are not known (**Section 3.12**).

Impact Analysis. Acres open and closed to nonenergy leasable mineral leasing do not vary substantially across alternatives, as the acres in **Table 5-18** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres open or closed. As shown in **Table 5-18**, any alternative for nonenergy leasable minerals management in the Idaho and southwestern Montana LUPA would affect 2 percent or less of GRSG habitat within MZs II/VII.

**Table 5-18**  
**Acres Open and Closed to Nonenergy Leasable Mineral Leasing in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open to Nonenergy Leasing <sup>2</sup>				
Alternative A	5,986,000	1%	7,926,000	<1%
Alternative B	5,934,000	0%	7,903,000	<1%
Alternative C	5,934,000	0%	7,900,000	0%
Alternative D	5,934,000	0%	7,926,000	<1%
Alternative E	5,983,000	1%	7,911,000	<1%
Alternative F	5,934,000	0%	7,903,000	<1%
Proposed Plan	5,934,000	0%	7,926,000	<1%
Closed to Nonenergy Leasing				
Alternative A	3,614,000	<1%	1,112,000	<1%
Alternative B	3,665,000	2%	1,109,000	<1%
Alternative C	3,675,000	2%	1,106,000	0%
Alternative D	3,665,000	2%	1,112,000	<1%

**Table 5-18**

**Acres Open and Closed to Nonenergy Leasable Mineral Leasing in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative E	3,614,000	<1%	1,108,000	<1%
Alternative F	3,665,000	2%	1,109,000	<1%
Proposed Plan	3,646,000	1%	1,114,000	<1%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA open and closed to nonenergy leasing in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Overall, the Montana and Wyoming state actions, such as the disturbance cap, planned restoration activities, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from nonenergy leasable minerals management regardless of management within the Idaho and southwestern Montana sub-region.

**Infrastructure**

*Rights-of-Way*

Nature and Type of Effects. The impacts of ROWs on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Infrastructure, such as ROWs and associated facilities and urbanization, is widespread throughout MZs II/VII. In some locations, infrastructure development has affected GRSG habitat. Development of roads, fences, and utility corridors has also contributed to habitat loss and fragmentation in portions of MZs II/VII. The best available estimates suggest about 25 percent of the MZs II/VII are within approximately 4 miles of urban development (Knick et al. 2011, p. 214). Impacts of infrastructure development in MZ IV are primarily related to highways, roads, power lines, and communication towers, with 90 percent of MZs II/VII within 4 miles of a road, 25 percent within 4 miles of a power line, and 5 percent within 4 miles of a communication tower (Knick et al. 2011, pp. 215-216).

Although not representative of all infrastructure ROWs, transmission lines greater than 115 kilovolts indirectly influence 60 percent of PPHMA and 63 percent of PGHMA across MZs II/VII. Indirect effects are assumed to occur

to a radius of 4 miles (Manier et al. 2013, p. 41). Approximately 50 percent of transmission lines in PHMAPPH and 45 percent in PGHMAPGH are on BLM-administered lands across GRSG habitats in MZs II/VII (Manier et al. 2013, p. 41). There is also a substantial contribution from private lands, where 42 percent of transmission lines in PHMAPPH and 47 percent in PGHMAPGH are located. In contrast, National Forest System lands contain 1 percent of transmission lines in PHMAPPH and 1 percent in PGHMAPGH. Therefore, actions on BLM-administered and private lands are likely to have the greatest potential to affect transmission line ROWs in GRSG habitat than other land management entities. Designating ROW exclusion and avoidance areas in PHMA and GHMA on BLM-administered and National Forest System lands could reduce the threat on these lands. However, in areas with scattered federal landownership, infrastructure may be routed around federal lands, often increasing its length and impact. ROW avoidance and exclusion areas on BLM-administered and National Forest System lands could increase this tendency.

Impact Analysis. Acres managed as open, exclusion, and avoidance for ROWs do not vary substantially across alternatives, as the acres in **Table 5-19** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres managed as open, exclusion, or avoidance. As shown in **Table 5-19**, any action alternative for ROW management in the Idaho and southwestern Montana LUPA would affect 8 percent or less of GRSG habitat within MZs II/VII. The greatest impacts would result under Alternatives B, C, and F, where PHMA in the Idaho and southwestern Montana sub-region would be managed as ROW exclusion.

**Table 5-19**  
**Acres of Rights-of-Way Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
	Open to Rights-of-Way <sup>2</sup>			
Alternative A	122,000	37%	5,980,000	<1%
Alternative B	77,000	0%	5,958,000	0%
Alternative C	77,000	0%	5,594,000	0%
Alternative D	77,000	0%	5,954,000	0%

**Table 5-19**  
**Acres of Rights-of-Way Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative E	77,000	0%	5,961,000	0%
Alternative F	77,000	0%	5,958,000	0%
Proposed Plan	77,000	0%	5,954,000	0%
Right-of-Way Exclusion				
Alternative A	564,000	0%	675,000	0%
Alternative B	609,000	7%	674,000	0%
Alternative C	614,000	8%	674,000	0%
Alternative D	564,000	0%	674,000	0%
Alternative E	564,000	0%	674,000	0%
Alternative F	609,000	7%	674,000	0%
Proposed Plan	564,000	0%	674,000	0%
Right-of-Way Avoidance				
Alternative A	8,306,000	0%	3,114,000	0%
Alternative B	8,305,000	0%	3,114,000	0%
Alternative C	8,305,000	0%	3,114,000	0%
Alternative D	8,351,000	<1%	3,142,000	<1%
Alternative E	8,348,000	<1%	3,114,000	0%
Alternative F	8,305,000	0%	3,114,000	0%
Proposed Plan	8,336,000	<1%	3,134,000	<1%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations

This table displays the acres of PHMA and GHMA within rights-of-way designations in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

The numbers of ROW authorizations are anticipated to grow in the sub-region. Increasing populations, continued energy development, and new communication sites drive the need for new ROWs on both federal and non-federal lands.

New ROW authorizations that require state agency review or approval would be subject to the permitting process and stipulations for development in GRSG Core areas under the Wyoming and Montana ~~eExecutive eOrders executive orders~~. These stipulations would benefit the GRSG in Core ~~aAreasareas~~ by encouraging ROW development outside of core habitat areas, restricting surface occupancy within 0.6 mile of occupied leks, prohibiting power lines greater than 115 kV outside of designated corridors, and locating new roads used to transport products or waste over 1.9 miles from occupied leks.

Presidential Priority transmission projects which are proposed in MZs II/VII (i.e., Transwest Express and Gateway West), would not be subject to GRSG conservation requirements in BLM and Forest Service LUPAs, but would be subject to requirements in applicable state plans as well as other state and federal laws and regulations. They would also develop their own suite of protective measures analyzed in project-specific NEPA documents. Whether or not these project-specific measures would adequately protect GRSG is unknown at this point in time because the measures have not been finalized. Regardless, impacts would likely be greater in Colorado where the proposed route would impact approximately 26 miles in PACs and 57 miles in PHMA in the Little Snake and White River BLM Field Offices. This impact would be especially harmful to fringe GRSG populations in Colorado, as some are less robust than those in Wyoming and southern Montana. In Wyoming, the routes avoid Core ~~aAreasareas~~ due to that state plan's requirements; this would reduce impacts in Wyoming. Overall, the Montana and Wyoming state actions, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from ROW management regardless of management within the Idaho and southwestern Montana sub-region.

#### *Renewable Energy*

Nature and Type of Effects. The impacts of renewable energy development on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. While most federal lands are not currently leased or developed for wind or solar energy, the areas of potential development coincide closely with GRSG habitats, especially in MZs II/VII (Manier et al. 2013, p. 60).

Although not representative of all renewable energy development, wind turbines on BLM-administered land indirectly influence less than 1 percent of

PPHMAPPH and PGHMAPGH combined across MZs II/VII. Private lands account for 70 percent of wind turbines affecting GRSG in PPHMAPPH (and 73 percent in PGHMAPGH) within MZs II/VII (Manier et al. 2013, p. 61). Therefore, actions on private land are likely to have a greater potential to ameliorate the effects of wind energy development than any other single land management entity.

Impact Analysis Table 5-20 displays acres open to wind energy ROW and wind energy exclusion and avoidance areas by alternative.

**Table 5-20**  
**Acres of Wind Energy Management Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open to Wind Rights-of-Way <sup>2</sup>				
Alternative A	45,000	100%	5,487,000	<1%
Alternative B	0	0%	5,465,000	<1%
Alternative C	0	0%	5,460,000	0%
Alternative D	0	0%	5,460,000	0%
Alternative E	0	0%	5,467,000	<1%
Alternative F	0	0%	5,465,000	<1%
Proposed Plan	0	0%	5,461,000	0%
Wind Right-of-Way Exclusion				
Alternative A	3,765,000	0%	957,000	0%
Alternative B	3,810,000	1%	957,000	0%
Alternative C	3,815,000	1%	957,000	0%
Alternative D	3,809,000	1%	957,000	0%
Alternative E	3,765,000	0%	957,000	0%
Alternative F	3,810,000	1%	957,000	0%
Proposed Plan	3,796,000	1%	958,000	<1%



**Table 5-20**  
**Acres of Wind Energy Management Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Wind Right-of-Way Avoidance				
Alternative A	5,184,000	0%	3,305,000	0%
Alternative B	5,184,000	0%	3,305,000	0%
Alternative C	5,184,000	0%	3,305,000	0%
Alternative D	5,185,000	<1%	3,332,000	<1%
Alternative E	5,226,000	1%	3,305,000	0%
Alternative F	5,184,000	0%	3,305,000	0%
Proposed Plan	5,184,000	0%	3,323,000	<1%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

<sup>2</sup> Open with standard stipulations. This table displays the acres of PHMA and GHMA within wind energy management designations in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Acres managed as open, avoidance, and exclusion for wind energy development do not vary substantially across alternatives, as the acres in **Table 5-20** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres managed as open, avoidance, or exclusion. As shown in **Table 5-20**, any action alternative for wind energy management in the Idaho and southwestern Montana LUPA would affect 1 percent or less of GRSG habitat within MZs II/VII.

All Proposed Plans within Wyoming in MZs II/VII rely on wind ROW avoidance designations to protect GRSG habitat rather than wind ROW exclusion. Similar to other ROWs, this approach preserves management flexibility in situations where landownership is mixed. Without this flexibility, rerouting ROWs across nonfederal land may result in a longer route, increasing disturbance of GRSG leks, nests, and brood-rearing and wintering areas more than direct routing across federal land. Other Proposed Plans in MZs II/VII would manage PHMA as

ROW exclusion, thereby providing the greatest protection on federal lands, but potentially increasing impacts on nonfederal lands.

Reasonably foreseeable future projects within MZs II/VII include renewable energy developments, such as the Chokecherry/Sierra Madre Wind Farm in southern Wyoming. Projects which require state agency review or approval would be subject to the Wyoming Executive Order permitting process for development in core areas, which would encourage ROW development outside of ~~Core~~ ~~habitat~~ ~~Areas~~ and restrict surface occupancy within 0.6 miles of occupied leks. Overall, the Montana and Wyoming state actions, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from wind energy management regardless of management within the Idaho and southwestern Montana sub-region.

**Grazing/Free-Roaming Equids**

Nature and Type of Effects. The impacts of livestock grazing and free-roaming equids on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Livestock grazing is present and widespread on many land types, such as federal and private, across MZs II/VII. Rangeland health assessments have found that nearly 4 percent of BLM-administered grazing allotments in GRSG habitat in MZs II/VII are not meeting wildlife standards with grazing as a causal factor. Additionally, nearly 5 million acres of GRSG habitat within MZs II/VII, largely in the central portion of the area, is federally managed wild horse and burro range (Manier et al. 2013, p. 131).

Impact Analysis. **Table 5-21** lists the acres of PHMA and GHMA available and unavailable for grazing by alternative.

**Commented [JMM35]:** This was written as 19 percent on page 28. Review and edit accordingly.

**Table 5-21  
Acres Available and Unavailable to Livestock Grazing in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Available to Livestock Grazing				
Alternative A	8,915,000	1%	9,711,000	<1%
Alternative B	8,915,000	1%	9,689,000	<1%
Alternative C	8,871,000	0%	9,684,000	0%
Alternative D	8,915,000	1%	9,711,000	<1%

**Table 5-21  
Acres Available and Unavailable to Livestock Grazing in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative E	8,913,000	<1%	9,692,000	<1%
Alternative F	8,915,000	1%	9,689,000	<1%
Proposed Plan	8,901,000	<1%	9,705,000	<1%
Unavailable to Livestock Grazing				
Alternative A	28,000	0%	16,000	0%
Alternative B	28,000	0%	16,000	0%
Alternative C	78,000	64%	16,000	0%
Alternative D	28,000	0%	16,000	0%
Alternative E	28,000	0%	16,000	0%
Alternative F	28,000	0%	16,000	0%
Proposed Plan	28,000	0%	16,000	0%

Source: BLM GIS 2015

This table displays the acres of PHMA and GHMA available and unavailable to livestock grazing in MZ I; it also displays the percentage of those acres that are found within the planning area.

Acres available and unavailable to livestock grazing generally do not vary substantially across alternatives, as the acres in **Table 5-21** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres available or unavailable. As shown in **Table 5-21**, most alternatives for livestock grazing management in the Idaho and southwestern Montana LUPA would affect 1 percent or less of GRSG habitat within MZs II/VII. The exception would be under Alternative C, where grazing would be removed from PHMA in the Idaho and southwestern Montana sub-region. This represents 64 percent of the total acres unavailable to grazing in MZs II/VII under this alternative. Impacts from removal of grazing under Alternative C would be as described in **Section 5.1.6**.

Since 2010, SGI has enhanced rangeland health through rotational grazing systems, re-vegetating former rangeland with sagebrush and perennial grasses and control of invasive weeds. On privately-owned lands, SGI has developed a prescribed grazing approach that balances forage availability with livestock demand. This system allows for adjustments to timing, frequency, and duration of grazing, ensuring rangelands are managed sustainably to provide continued ecological function of sagebrush-steppe. A primary focus of the prescribed grazing approach is maintenance of key plant species, such as deep-rooted perennial grasses that have been shown to be essential for ecological resistance to invasive annual grasses (Reisner et al. 2013, pp. 1047-1048). These actions help to alleviate the adverse impacts associated with improper grazing practices outlined above under Nature and Type of Effects. Within MZs II/VII, SGI has implemented 543,511 acres of prescribed grazing systems. This program is likely the largest and most impactful program on private lands within MZs II/VII. Because of its focus on priority areas for conservation, which often overlap PHMA, the SGI's past, present, and reasonably foreseeable work has had and likely will continue to have a cumulative beneficial impact on GRSG when considered alongside protective BLM management actions in PHMA.

NRCS actions under the Sage-Grouse Initiative, including fence marking and conservation easements, state efforts to maintain ranchland, other BLM and Forest Service Proposed Plans within MZs II/VII, and other past, present, and reasonably foreseeable future actions will provide a net conservation gain to GRSG habitats and populations in MZs II/VII from livestock grazing management regardless of management within the Idaho and southwestern Montana sub-region.

#### ***Spread of Weeds***

Nature and Type of Effects. The impacts of weed spread on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Cheatgrass is distributed throughout these MZs, though generally not with the same abundance observed in other areas, such as the Great Basin. Localized areas, such as southern Wyoming, are more invaded than cooler parts of the region (Manier et al. 2013, p. 131).

The BLM currently manages weed infestations through integrated weed management: biological, chemical, mechanical, manual, and educational methods. It is guided by the 1991 and 2007 RODs for Vegetation Treatment on BLM Lands in Thirteen Western States (BLM 1991) and by the 2007 Programmatic Environmental Report (BLM 2007). Weeds are managed in cooperation with county governments and represents a landscape-level approach across management jurisdictions.

Impact Analysis. Given the small acreage of the Idaho and southwestern Montana sub-region within MZs II/VII, it is unlikely that the alternatives in the Idaho and southwestern Montana LUPA would have a measurable contribution to cumulative effects from invasive weed management within MZs II/VII.

Invasive species on BLM-administered and National Forest System lands would be controlled under all alternatives and may be more successful given the lower extent of invasion within the MZs. This would provide a net conservation gain to GRSG by restoring degraded sagebrush habitat.

Relevant cumulative actions that result in surface-disturbing activities would increase the potential for the spread of invasive weeds on both federal and non-federal lands. Projects subject to the general stipulations outlined in the Montana and Wyoming ~~eExecutive eOrder~~ executive orders are required to control noxious and invasive weed species and to use native seed mixes during reclamation processes. These stipulations would benefit GRSG core habitat areas. They would accomplish this by limiting the spread or establishment of invasive species, particularly on lands that lack BLM and Forest Service protective regulatory mechanisms. Further, the *Greater Sage-Grouse Habitat Conservation Strategy for NRCS in Idaho* has identified GRSG conservation measures related to invasive weeds, such as reducing the risk and rate of fire spread, restoration and rehabilitation, and weed control. A number of projects are ongoing or in the planning phase to treat nonnative, invasive species (Appendix A).

These stipulations, in combination with other state and county noxious weed regulations, other BLM and Forest Service Proposed Plans in MZs II/VII, and other past, present, and reasonably foreseeable future actions, would provide a net conservation gain to GRSG habitats and populations in MZs II/VII under all the project alternatives, regardless of management within the Idaho and southwestern Montana sub-region.

#### **Conversion to Agriculture**

Nature and Type of Effects. The impacts of conversion to agriculture on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Regional assessments estimate that while only 1 percent of PPHMAPPH and PGHMAPGH in MZs II/VII are directly influenced by agricultural development, over 80 percent of these habitats are within approximately 4 miles of agricultural land (Manier et al. 2013, p. 27).

Impact Analysis. The BLM and Forest Service do not convert public lands to agriculture. As such, the only direct authority these agencies have over conversion to agriculture is by retaining or disposing of lands in the realty program. Lands retained under BLM and Forest Service management will not be converted to agriculture and disposing of lands could increase the likelihood

they will be converted to agriculture, depending on their location and the policies of the new management authority.

Acres identified for retention and disposal generally do not vary substantially across alternatives, as the acres in **Table 5-22** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres identified for retention or disposal. As shown in **Table 5-22**, most alternatives for land tenure adjustments in the Idaho and southwestern Montana LUPA would affect 4 percent or less of GRSG habitat within MZs II/VII. The exception would be under Alternatives A and E, which would identify some PHMA in the Idaho and southwestern Montana sub-region for disposal. This represents 65 and 63 percent of the total acres identified for disposal in MZs II/VII under Alternatives A and E, respectively.

**Table 5-22**  
**Acres Identified for Retention and Disposal in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Acres Identified for Retention				
Alternative A	7,272,000	<1%	8,930,000	<1%
Alternative B	7,315,000	1%	8,908,000	0%
Alternative C	7,320,000	1%	8,907,000	0%
Alternative D	7,315,000	1%	8,934,000	<1%
Alternative E	7,272,000	<1%	8,908,000	0%
Alternative F	7,315,000	1%	8,908,000	0%
Proposed Plan	7,291,000	<1%	8,938,000	<1%
Acres Identified for Disposal				
Alternative A	67,000	65%	160,000	3%

**Table 5-22**  
**Acres Identified for Retention and Disposal in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative B	24,000	0%	160,000	3%
Alternative C	24,000	0%	156,000	0%
Alternative D	24,000	0%	156,000	0%
Alternative E	65,000	63%	162,000	4%
Alternative F	24,000	0%	160,000	3%
Proposed Plan	24,000	0%	156,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA identified for retention and disposal in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Cumulative impacts vary relatively little across alternatives, and BLM and Forest Service management may have little impact on alleviating this threat. Restrictions on grazing on federal land could increase agriculture pressure on adjacent private lands. If the loss of federal grazing rights makes ranching economically unviable, the potential conversion of private grazing lands to agriculture would increase. However, the Proposed Plan does not substantially increase acreage unavailable to grazing.

The COT report objectives for converting land to agriculture are to avoid further loss of sagebrush habitat for agricultural activities (both plant and animal production) and to prioritize restoration. In areas where taking agricultural lands out of production has benefited GRSG, the programs supporting these actions should be targeted and continued (USFWS 2013, p. 48). In accordance with this objective, the NRCS's SGI program focuses on maintaining rangeland that provides habitat for GRSG.

This voluntary program provides private landowners with monetary incentives to protect GRSG habitat, often through conservation easements. As a result, private land containing GRSG habitat is protected from conversion to agriculture or other development for the life of the conservation agreement. The conservation easements and other conservation incentives, such as restoration of water features and fence marking, can enhance the ability of

private rangelands to support GRSG. As of 2014, SGI has secured conservation easements on 243,403 acres within MZs II/VII and marked or removed 23 miles of fence (NRCS 2015). This has preserved habitat and reduced the risk of direct mortality on these lands. As a result, these efforts, in conjunction with BLM and Forest Service management, would provide a net conservation gain to GRSG habitats and populations in MZs II/VII, regardless of management within the Idaho and southwestern Montana sub-region.

#### **Fire**

Nature and Type of Effects. The impacts of fire on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.

Conditions in the Sub-region and in MZs II/VII. Fire risk is generally low across MZs II/VII, though areas in the northern and southern portions of the MZs have a higher fire risk (Manier et al. 2013, p. 131). Within the MZs, 10 percent of PHMAPPH and GHMAPGH have a high risk for fire (Manier et al. 2013, p. 85).

Impact Analysis. Given the small acreage of the Idaho and southwestern Montana sub-region within MZs II/VII, it is unlikely that the alternatives in the Idaho and southwestern Montana LUPA would have a measurable contribution to cumulative effects from fire management within MZs II/VII.

Recognition of the importance of sagebrush habitat during interagency wildfire response would benefit GRSG in the event of an unplanned fire. The Montana ~~Executive Order~~ emphasizes fire suppression in ~~Core Population Areas~~, while recognizing other suppression priorities may take precedent. This would benefit GRSG during wildfire planning and response, particularly on lands not administered by the BLM or Forest Service.

The Interagency Standards for Fire and Fire Aviation Operations “Red Book” includes a BMP for GRSG habitat conservation for wildlife and fuels management (BLM 2013b). This document is a supplemental policy or guidance for the BLM, the Forest Service, and the USFWS. This BMP would benefit the GRSG during interagency wildland fire operations. It would do this by using spatial habitat data and predictive services to prioritize and preposition firefighting resources in critical habitat areas. The coordination of federal, state, and local fire prevention actions and changes in fire management would provide a net conservation gain to GRSG habitats and populations in MZs II/VII, regardless of management within the Idaho and southwestern Montana sub-region.

#### **Recreation**

Nature and Type of Effects. The impacts of recreation on GRSG are described in **Section 4.2** and above in **Section 5.1.6**.



Conditions in the Sub-region and in MZs II/VII. Human populations have increased and expanded, primarily over the past century and in the western portion of the sagebrush distribution. Within MZs II/VII, population densities have increased 31 percent on the Colorado Plateau and 19 percent in the Wyoming Basin (Knick et al. 2011, p. 212). With these expanding populations come greater human impacts (Leu et al. 2008).

The COT report objectives for recreation are to maintain healthy native sagebrush communities, based on local ecological conditions, and to manage direct and indirect human disturbance (including noise) to avoid interruption of normal GRSG behavior (USFWS 2013, p. 49). Limits on road use under the action alternatives and limits on OHVs would help meet these objectives.

In the Idaho and southwestern Montana sub-region, travel management planning is underway to determine specific routes available for closure.

Impact Analysis. **Table 5-23** shows Acres of Travel Management Designations in GRSG Habitat in MZs II/VII.

**Table 5-23**  
**Acres of Travel Management Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Open				
Alternative A	5,000	0%	58,000	0%
Alternative B	5,000	0%	5,000	0%
Alternative C	5,000	0%	5,000	0%
Alternative D	5,000	0%	5,000	0%
Alternative E	5,000	0%	5,000	0%
Alternative F	5,000	0%	5,000	0%
Proposed Plan	5,000	0%	58,000	0%
Limited				
Alternative A	8,876,000	1%	9,338,000	<1%

**Table 5-23**  
**Acres of Travel Management Designations in GRSG Habitat in MZ II/VII**

	Priority Habitat Management Areas		General Habitat Management Areas <sup>1</sup>	
	MZ II/VII	Percent Within Planning Area	MZ II/VII	Percent Within Planning Area
Alternative B	8,876,000	1%	9,315,000	<1%
Alternative C	8,876,000	1%	9,310,000	0%
Alternative D	8,876,000	1%	9,338,000	<1%
Alternative E	8,873,000	<1%	9,317,000	<1%
Alternative F	8,876,000	1%	9,315,000	<1%
Proposed Plan	8,861,000	<1%	9,331,000	<1%
Closed				
Alternative A	112,000	0%	366,000	0%
Alternative B	112,000	0%	366,000	0%
Alternative C	112,000	0%	366,000	0%
Alternative D	112,000	0%	366,000	0%
Alternative E	112,000	0%	366,000	0%
Alternative F	112,000	0%	366,000	0%
Proposed Plan	112,000	0%	366,000	0%

Source: BLM GIS 2015

<sup>1</sup> Includes IHMA

This table displays the acres of PHMA and GHMA within travel management designations of open, limited and closed in MZ II/VII; it also displays the percentage of those acres that are found within the planning area.

Acres open, closed, and limited to motorized vehicles do not vary substantially across alternatives, as the acres in **Table 5-23** represent the Proposed Plans from other BLM and Forest Service sub-regions and planning areas in MZs II/VII combined with the management in the MZs II/VII portion of the Idaho and

southwestern Montana sub-region. Since the Idaho and southwestern Montana sub-region has so few acres within MZs II/VII, alternatives in this sub-region would have a relatively small influence on total acres open, closed or limited. As shown in **Table 5-23**, any alternative for travel management in the Idaho and southwestern Montana LUPA would affect 1 percent or less of GRSG habitat within MZs II/VII.

Implementation of the other BLM and Forest Service Proposed Plans, in concert with limitations on National Forest System lands and the disturbance caps applied under state plans, would help reduce the threats from recreation and travel on GRSG habitats and would provide a net conservation gain to GRSG populations in MZs II/VII, regardless of management within the Idaho and southwestern Montana sub-region.

#### **Conifers**

**Nature and Type of Effects.** Conifer woodlands, especially juniper (*Juniperus* spp.) and in some regions pinyon pine (*Pinus edulis*), may expand into sagebrush habitat and reduce availability of habitat for GRSG. Conifer expansion may be encouraged by human activities, including fire suppression and grazing (Miller et al. 2011). If woodland development is sufficient to restrict shrub and herbaceous understory growth, habitat quality for GRSG will be reduced (Connelly et al. 2004). Mature trees offer perch sites for raptors; thus, woodland expansion may also increase the threat of predation, as with powerlines (Manier et al. 2013). Locations within approximately 1,000 yards of current pinyon-juniper woodlands are at highest risk of expansion (Bradley 2010). The greatest risks from conifer encroachment are thought to be in the Great Basin, with smaller risks (6 to 7 percent of PH and GH) in the Wyoming Basin (Connelly et al. 2004; Manier et al. 2013). Studies have shown that GRSG incur population-level impacts at very low levels of conifer encroachment (Baruch-Mordo et al. 2013).

**Conditions in MZs II/VII.** Approximately 46 percent of conifer encroachment risk in PPHMAPPH (and 43 percent in PGHMAPGH) occur on BLM-administered lands within MZs II/VII (Manier et al. 2013). Therefore, BLM actions are likely to have a greater potential to ameliorate the effects of conifer encroachment on GRSG than any other single land management entity.

**Impact Analysis.** Specific required design features common to all BLM and Forest Service plans in MZs II/VII include removal of standing and encroaching trees within 100 meters of occupied leks and other habitats (e.g., nesting, wintering, and brood rearing). Additionally, reintroduction of appropriate fire regimes would limit conifer encroachment into the sagebrush plant communities. These actions would benefit GRSG by improving the quality of habitat throughout the MZ.

Additionally, under all action alternatives and the Proposed Plan, conifer removal treatments would be prioritized closest to occupied GRSG habitats and

near occupied leks, and where juniper encroachment is phase I or phase 2. This action would benefit GRSG by improving the quality of habitat and functionality.

Recommendations within the Wyoming State Plan call for removal of juniper and other conifers where they have invaded sagebrush sites important to GRSG, which could help ameliorate the threat on non-federal lands. In Colorado, the Colorado Parks and Wildlife has conducted conifer treatments totaling 2,600 acres (Colorado Department of Natural Resources 2013).

**Commented [JMM36]:** Executive Order? Core Area Strategy? We don't have anything with the label "Wyoming State Plan"

SGI has helped reduce the threat of early succession conifer encroachment through mechanical removal on 10,500 acres of private lands within MZs II/VII. The majority of these efforts were located inside PACs (NRCS 2015), helping to preserve historic fire return intervals and important GRSG habitat. While the threat of conifer encroachment is likely to continue under all alternatives and the Proposed Plan, implementing mechanical treatments and reintroduction of appropriate fire regimes would result in a net conservation gain for GRSG.

#### 5.1.11 Conclusions

In addition to BLM and Forest Service management in the Idaho and southwestern Montana sub-region and other planning areas in MZs IV and II/VII, GRSG in these MZs will also be impacted by management and conservation at state, regional, tribal and local levels. This analysis takes into account each alternative in the Idaho and southwestern Montana LUPA in conjunction with state and private initiatives, as well as past, present, and reasonably foreseeable future actions at the federal, state, and local levels. The analysis assumes that the Proposed Plans would be implemented in the other BLM and Forest Service LUPA planning areas in MZs IV and II/VII.

Some of the most important past and present actions benefitting GRSG populations on private land in MZ IV and II/VII are the conservation easements coordinated by the NRCS SGI with private ranchers. SGI has also worked with landowners to increase fence marking, seeding of native vegetation, and conifer removal to improve GRSG habitat quality. Future coordination of private landowners with SGI is expected to provide further benefits to GRSG habitat.

**Commented [JMM37]:** SGI is not the sole source of conservation easements. I would add the other sources (BLM, USFS, State of Wyoming, etc)

This coordination with private landowners enhances conservation in addition to what BLM and Forest Service management can accomplish on federal lands. Ranchers in Wyoming and Montana are also using Candidate Conservation Agreement with Assurances with the USFWS. Under these instruments, the ranchers voluntarily agree to manage lands to reduce threats to GRSG in exchange for a guarantee that they will not be subject to additional regulations should the species become listed. While ranchers have used these agreements across the GRSG range, thus far the agreements have been applied to only a small number of ranches in Wyoming and Montana.

As discussed in **Sections 5.1.4 and 5.1.8**, both Wyoming and Montana have adopted statewide plans to promote GRSG conservation. Both plans implement

a Core Population Area Strategy with well density limitations, timing restrictions, and a uniform 5 percent disturbance cap across all landownership types. These measures would improve GRSG population levels if effectively enforced (Copeland et al. 2013) and would primarily affect MZs II/VII. The limitations on timing and density of energy development along with the disturbance cap, and BLM and Forest Service management on lands with federal mineral estate, would act in concert to promote GRSG conservation and reduce the impacts from energy development on leks, breeding habitat, and wintering habitat.

However, a majority of MZ IV, including the states of Idaho, Oregon, Nevada, and Utah, do not have similar executive orders in place. These states do have GRSG conservation plans, but these plans generally include voluntary guidelines, not regulatory mechanisms. This could allow for more impacts on the 31 percent of GRSG habitat within the MZ that is state or privately owned. Since most GRSG habitat in MZ IV (68 percent) is under federal management, BLM and Forest Service regulatory mechanisms will have a substantial contribution to cumulative effects.

BLM and Forest Service restrictions on ROWs/SJAs, renewable energy, and energy development in GRSG habitat would help reduce loss and disturbance of GRSG populations. The Proposed Plan includes numerous measures to allow development while reducing the likelihood for impacts on GRSG, such as requirements for anthropogenic disturbance criteria, a 3 percent disturbance cap, buffers, mitigation, and RDFs and BMPs.

The more challenging threats to manage in MZ IV are fire, the spread of weeds, and conifer encroachment. Fire regimes are complex and vary tremendously across the sagebrush region and through time; furthermore, the ecological role of fire has changed dramatically since the European settlement era (circa 1850) due to changing fuel and habitat patterns (Manier et al. 2013, p. 79). Fire is exacerbated by invasive weeds, particularly in Wyoming big sagebrush types, where the invasion by exotic annuals has resulted in dramatic increases in number and frequency of fires with widespread, detrimental effects on habitat conditions (Manier et al. 2013, p. 88). Expansion of conifer woodlands, especially juniper (*Juniperus* spp.) do not provide suitable habitat for GRSG, and mature trees displace shrubs, grasses and forbs through direct competition (Manier et al. 2013, p. 91). These threats are at the landscape scale and are extensive throughout MZ IV; the Proposed Plans within MZ IV include a comprehensive strategy to address these threats.

*Alternative A: Current Management*

Under Alternative A, current management would continue on BLM-administered and National Forest System lands in the Idaho and southwestern Montana sub-region. Several protective measures would not be implemented; for example, the BLM and Forest Service would not designate PHMA or GHMA

and would not manage any additional ROW/SUA avoidance or exclusion areas. Alternative A does not include any consistent management prescriptions to protect GRSG across the sub-region, though several individual BLM district offices and National Forests have some protections in place. Appropriate and allowable uses and restrictions with regard to such activities as mineral leasing and development, recreation, utility corridors, and livestock grazing would also remain unchanged.

Under current management, widespread wildfire and subsequent spread of nonnative, invasive species have destroyed and degraded PHMA and PGMA, particularly in MZ IV. This is likely to continue and reinforce the cycle of fire and weed spread. Further, the expansion of conifers, particularly juniper, will continue to reduce the suitability of sagebrush habitats for GRSG.

In the rest of MZs IV and II/VII, other BLM and Forest Service LUPA planning efforts would implement their Proposed Plans to improve protection of GRSG and their habitat. In addition, GRSG conservation strategies would be implemented on state and private lands. As a result, the lack of protections under the Idaho and southwestern Montana LUPA Alternative A would be offset to an extent by more protective management elsewhere in the MZs, particularly within MZs II/VII. In the Idaho and southwestern Montana sub-region, though, continuation of current management would do little to reduce the major threats to GRSG in the sub-region: wildfire, invasive weeds, and conifer encroachment. Current management provides a limited number and extent of regulatory mechanisms to avoid continued degradation of GRSG habitat in MZs IV and II/VII, but it would not meet the COT report objectives for conservation of GRSG.

#### *Alternative B*

Under Alternative B, the BLM and Forest Service would manage lands to conserve, enhance, and restore sagebrush ecosystems. In conjunction with NRCS and state initiatives on private land, several aspects of BLM and Forest Service management under Alternative B would benefit GRSG conservation at a landscape level. These include implementation of a 3 percent disturbance cap, retention of GRSG habitat, restrictions on resource uses such as managing PHMA as ROW exclusion and closed to mineral development, and prioritizing restoration in GRSG habitat. Implementing these protective measures on BLM-administered and National Forest System lands within the Idaho and southwestern Montana sub-region would help reduce damage to GRSG habitat, minimize loss of connectivity and could also minimize the spread of invasive species by limiting human activities that disturb soil or introduce seeds. However, such restrictions could also risk pushing development onto adjacent, nonfederal lands with less restrictive management. This is particularly a concern where nonfederal lands have fewer protections (e.g., most of MZ IV). In parts of MZ IV and MZs II/VII, some nonfederal lands have similarly restrictive measures such as in Core [Areas](#) in Wyoming and Montana (though Core areas do

not cover all existing GRSG populations), which would reduce the likelihood for impacts.

In combination with other past, present, and reasonably foreseeable future actions, Alternative B would likely meet the objectives laid out in the COT report for infrastructure, grazing/free-roaming equids, conversion to agriculture, energy development, and recreation. Without a comprehensive strategy to address fire, invasive weeds, and conifer encroachment, it may not meet the COT objectives for these threats.

*Alternative C*

Under Alternative C, the BLM and Forest Service would manage lands to conserve, enhance, and restore sagebrush ecosystems and would apply management to all occupied GRSG habitats, making it the most restrictive alternative for development in GRSG habitat. In conjunction with NRCS and state initiatives on private land, several aspects of BLM and Forest Service management under Alternative C would benefit GRSG conservation at a landscape level. These include implementation of a 3 percent disturbance cap, removal of livestock grazing from BLM-administered and National Forest System lands, and closure to leasable mineral development. Impacts would be similar to those described for Alternative B, but could be greater due to the larger area over which restrictions would be applied.

Together with other past, present, and reasonably foreseeable future actions, Alternative C would likely meet the objectives laid out in the COT report for infrastructure, conversion to agriculture, energy development, and recreation. Without a comprehensive strategy to address fire, invasive weeds, and conifer encroachment, it may not meet the COT objectives for these threats. Further, it is unknown whether removal of grazing would meet the COT objectives for range management, as analyzed above and in greater detail in **Section 4.2**.

*Alternative D*

Under Alternative D, the BLM and Forest Service would manage lands to conserve, enhance, and restore sagebrush ecosystems. Management and impacts would be similar to Alternative B, though Alternative D would incorporate more flexibility and adaptive management applied to resource uses to account for sub-regional conditions. The BLM and Forest Service would require a no net unmitigated loss of PHMA and ~~HMA~~HMA and would implement numerous conservation measures to reduce impacts from human activities in PHMA, such as management of GRSG habitat as ROW avoidance areas and closure to some mineral development. Alternative D also includes additional measures and planning for wildfire management.

Under Alternative D, the BLM would increase GRSG habitat protection over current management, but with less restrictive actions than under Alternatives B or C. In conjunction with state and regional planning efforts, implementation of state disturbance caps in GRSG core areas, conservation easements on private

**Commented [JMM38]:** Typo or undefined Idaho HMA?

lands, implementation of other BLM and Forest Service LUPAs in MZ IV and MZs II/VII, and other past, present, and reasonably foreseeable future actions, Alternative D would likely meet the objectives laid out in the COT report for fire, infrastructure, grazing/free-roaming equids, conversion to agriculture, energy development, and recreation. Without a comprehensive strategy to address invasive weeds and conifer encroachment, it may not meet the COT objectives for these threats.

*Alternative E*

Under Alternative E, the BLM and Forest Service would manage to maintain, conserve, enhance, and restore sagebrush ecosystems. In PHMA and IHMA, the BLM and Forest Service would incorporate management flexibility to permit high value infrastructure with appropriate mitigation and best management practices tailored for the sub-region. Management and impacts are similar to Alternative D, though Alternative E would require less stringent use restrictions and would designate the least amount of PHMA compared to the other alternatives' management area designations. Alternative E also includes additional measures and planning for wildfire management.

Under Alternative E, the BLM would increase GRSG habitat protection over current management, but with less restrictive actions than under Alternatives B, C, or D. In conjunction with state and regional planning efforts, implementation of state disturbance caps in GRSG core areas, conservation easements on private lands, implementation of other BLM and Forest Service LUPAs in MZ IV and MZs II/VII, and other past, present, and reasonably foreseeable future actions, Alternative E would likely meet the objectives laid out in the COT report for fire, infrastructure, grazing/free-roaming equids, and recreation. Alternative E imposes fewer restrictions on mining and energy development and does not provide guidance for land tenure decisions, so the alternative may not meet the COT objectives for mining, energy development, and conversion to agriculture. Without a comprehensive strategy to address invasive weeds and conifer encroachment, it also may not meet the COT objectives for these threats.

*Alternative F*

Management under Alternative F would be largely similar to that described for Alternative B, though with more stringent guidance and restrictive management in sagebrush ecosystems. Alternative F would implement a 3 percent disturbance cap but all surface disturbances (including human disturbance and fire) would count toward this cap. In addition, grazing would be reduced by 25 percent.

In combination with other past, present, and reasonably foreseeable future actions, Alternative F would likely meet the objectives laid out in the COT report for infrastructure, grazing/free-roaming equids, conversion to agriculture, energy development, and recreation. Without a comprehensive strategy to



address fire, invasive weeds, and conifer encroachment, it may not meet the COT objectives for these threats.

*Proposed Plan*

Under the Proposed Plan, the BLM and Forest Service would manage lands to conserve, enhance and restore GRSG habitat and the sagebrush ecosystem upon which GRSG populations depend. Management and impacts would be similar to Alternatives D and E, though the Proposed Plan would incorporate robust strategies and approaches to GRSG management, including wildfire and invasive species management, conifer removal, adaptive management, mitigation, a 3 percent disturbance cap, anthropogenic disturbance criteria, buffers, habitat objectives and monitoring. In addition to habitat management areas, SFAs would also be managed to protect recognized the most important areas for the species.

The Proposed Plan would provide a higher level of GRSG habitat protection compared to current management, while allowing flexibility for resource uses when there would be no impacts to GRSG.

In the rest of MZs II/VII, other BLM and Forest Service LUPAs would implement their Proposed Plans to improve protection of GRSG and their habitat. In addition, other regional GRSG conservation strategies as discussed in **Section 5.1.8**, would be implemented on non-federal lands. Reasonably foreseeable future actions in MZs II/VII such as proposed oil and gas developments, interstate transmission lines, and other land disturbance projects would be subject to the requirements set forth in the BLM and Forest Service Proposed Plans which encompass MZs II/VII, where those projects occur on federal decision area lands. For non-federal lands, reasonably foreseeable future projects may be subject to disturbance caps, buffer restrictions, and other requirements of GRSG state plans, as well as site specific mitigation measures.

In conjunction with state and regional planning efforts, implementation of state disturbance caps in GRSG core areas, conservation easements on private lands, implementation of other BLM and Forest Service LUPAs in MZ IV and MZs II/VII, and other past, present, and reasonably foreseeable future actions, the Proposed Plan would likely meet the objectives laid out in the COT report for fire, infrastructure, grazing/free-roaming equids, mining, energy development, conversion to agriculture, invasive weeds, conifer encroachment, and recreation.

*Summary*

Overall, GRSG populations across MZ IV and MZs II/VII face the greatest pressures from wildfire, invasive weeds, energy development, and infrastructure. BLM and Forest Service actions within the Idaho and southwestern Montana sub-region would have a limited influence on GRSG populations and habitats within MZs II/VII, but would substantially contribute to cumulative effects on populations and habitats within MZ IV.

Infrastructure and energy development are of particular concern in MZs II/VII because they affect the greatest amount of land. Numerous multi-state transmission lines are proposed through GRSG habitat, as are large-scale oil and gas field developments in excess of 100,000 acres. Implementation of the BLM and Forest Service Proposed Plans in MZs II/VII is unlikely to preclude such projects from proceeding, especially Presidential Priority transmission line projects that are not subject to GRSG protective measures in the BLM/USFS planning efforts. The cumulative effect of reasonably foreseeable future infrastructure and energy development projects over the next 10 years, when combined with unplanned events such as wildfires, drought, or West Nile virus outbreaks, could increase the likelihood of population extirpation, particularly for the less robust populations which are considered at-risk. However, restrictions on land use in combination with project-specific BMPs and required design features, and other regional efforts will help mitigate the effects.

Of particular concern is that threat reduction for fire is difficult and costly. Given the intensity and widespread distribution of the threat, it may never be fully eliminated (USFWS 2013, p. 40), but the comprehensive strategies under Alternatives D, E, and the Proposed Plan, may be able to reduce the threat considerably.

The Idaho and southwestern Montana sub-region in MZ IV contains one of the GRSG strongholds with the largest area of habitat rangewide with low similarity to extirpated portions of the range (USFWS 2013, p. 70). Both MZ IV and MZs II/VII support the two largest populations of GRSG rangewide (USFWS 2013, p. 75). As such, management within the sub-region and MZs is critical to preserving the species. All action alternatives considered in the Idaho and southwestern Montana LUPA would reduce threats to some degree and via different strategies.

Although small fringe populations may extirpated in the next ten years, implementing Alternatives B, E, F, or the Proposed Plan in combination with other regional efforts (such as the Proposed Plans for other BLM and Forest Service planning areas; conservation strategies in state plans; increased land protections via NRCS SGI, and local habitat restoration efforts) would effectively conserve the region-wide population of GRSG in MZs IV and II/VII.

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**GRSG 36: Greater Sage-grouse Monitoring Framework DD: March 15, 2015**  
*A Path Forward*

This Greater Sage-grouse Monitoring Framework will guide the BLM/FS approach to monitor sage-grouse habitats by collecting data that can be analyzed at multiple geographic scales and to monitor implementation decisions. The goal of monitoring is to demonstrate certainty in the implementation and effectiveness of our regulatory mechanisms and initiate adaptive management when/where needed.

**Monitoring Priorities:**

Monitoring for Sage-grouse				
	Implementation	Habitat		Population(States)
<i>Geographic Scales</i>	Decisions	Disturbance	Vegetation	Demographics
<i>Coarse scale:</i> Example management question: What is the status, trend, pattern, abundance and/or connectivity of sagebrush habitats?				
From the range of sage-grouse to WAFWA Management Zones (MZ)	LUP/LMP objectives and management actions	Priority and General habitat delineation (occupied habitat)	Existing national level vegetation monitoring and mapping efforts (remote sensing)	WAFWA MZ population level and population trends
<i>Mid-scale:</i> Example management question: What is the status, trend and/or condition of sagebrush habitats?				
From MZ level down to population level	LUP/LMP decisions, vegetation/ mid scale decisions	Percent of sagebrush, anthropogenic footprint, density of energy development	National data augmented with locally collected-data using core indicators and statistical study design	Subpopulation levels, dispersal and lek complex trends

**Who Does What:**

What: Region, WAFWA zone and mid-scale sage brush status and trend reporting

Who: Data collection funded at the WO 200 level, data analysis and reporting are led by the NOC

What: Region, WAFWA zone, and mid-sage brush patch size, pattern, and connectivity mapping and reporting

Who: Data collection funded by WO 200, analysis and reporting is completed by the NOC, data interpretation validated by FO botanists (off-season work months)

What: Disturbance mapping and reporting

Who: FO supplied geospatial footprint of new permitted disturbances, NOC analysis and reporting

What: Effectiveness of management actions reports

Who: FO supplied data, NOC assistance as requested for analysis and reporting

What: Implementation of management actions reports

Who: FO responsibility

What: Site level reporting

Who: Data collection and reporting based on local needs, FO responsibility

**Decision:**

- The Disturbance and Monitoring sub-group will move forward with developing language for the draft EISs that will establish a consistent monitoring framework – this language will be brought back to the land manager groups for review.
- Monitoring plans will be developed between draft and final that recognizes capacity, effectiveness, and temporal concerns.
- Monitoring data will be scalable.
  - The Disturbance and Monitoring sub-group will develop template language to be inserted into the Drafts. A draft will be sent to WO/Ed by March 29, 2013, to the Land Manager group by April 5, 2013, and will be discussed and hopefully approved on the Land Manager Call on April 12, 2013.



## Idaho/Montana Sage-Grouse Meeting

### Buffer Discussion

December 9, 2014 1:30 p.m. MST

Attendees: Jon Beck; Paul Makela; Ethan Ellsworth; Jason Pyron; Katie Powell; Kelly Bockting; Chris Colt

#### Handouts

- Buffers table.

#### Meeting Minutes

##### *Meeting Purpose*

- Review how ID/MT responded to Washington Office questions on buffers.
- Review potential changes to buffers based on USGS report.
- Compare buffer table and RDF table to ensure consistency.

##### *Response to WO Questions*

- Did you use buffers to designate PPH/PGH? Yes, 6.4 km buffer.
- What are the buffers for each resource use? Created summary table.
- Are the buffers allocations? No. They are another layer of protection on implementation level.
- Created a map of buffers.

##### *Buffers Table*

- USGS report recommends 3-5 mile buffer from surface disturbance. ID/MT interpreted this as including mineral development. Currently have 0.8-mile buffer for noise.
- Biologists want to incorporate decibel level as an indicator of disturbance. Consider incorporation of BMPs that accounts for impacts at 10 decibels at the edge of the lek for disturbing activities. **Ethan will work with Paul and Jason to develop a BMP/recommendation.**
- Pipelines and roads are classified as “linear features”. No changes to buffers are suggested.
- Unleased fluid minerals – ID/MT has NSO in Priority/Important and a 2-mile buffer for well pads. USGS report recommended 3.1 to 5 miles. **Team may consider increasing the buffer in GHMA.**
- Transmission lines: Currently have a 600 m buffer around leks and application of the anthropogenic disturbance criteria. USGS report recommends 3 to 5 miles. Larger buffer may impeded the flexibility of the disturbance criteria and preclude all development. **Team does not want to revise this buffer, but may consider including a 2-mile buffer as a BMP.**
- Distribution lines: No changes suggested.
- Solar Energy: Within USGS report recommendations.
- Wind Energy: PHMA as exclusion, IHMA as avoidance, GHMA as open. Need to include buffer clearly in the table.

- Communication towers, fences, and miscellaneous: No changes suggested.

#### *Potential Changes to BMPs/RDFs*

- New roads and upgrades: “High volume gravel roads” - might want to say which maintenance level this is. (e.g., just below a maintained paved road). **Consider removing lek buffer because it is captured by nesting habitat buffer of 0.8 mile. Nesting buffer will be BMP.**
- Fence collision: move/modify/mark fences to reduce collision risk. No buffer tied to it. This is an RDF in PHMA/IHMA and BMP in GHMA. There is also RDF #104 – no new fences within 2 km of occupied leks. Applies to all habitat types. **Add a BMP to cover marking existing fences.**
- Avoiding use of heavy equipment or targeted grazing in nesting habitat. No spatial buffer tied to it. **Make this an RDF where appropriate.**
- If it was a BMP in buffer table, make it an “RDF as appropriate”.

#### *Other*

- USFWS concerns about changing buffers and direction now after having length discussions with partners in the past and having come to agreement on these issues.
- Concerns about applying the same management to Priority/Important/General – if there will be the same management in all three management areas, it is not worth having three management areas.
- When discussing buffers, need to take other restrictions into account as well. For example, the exception criteria are intended to push projects into GHMA, and this is where buffers become important.
- Inflexible rules may not be the best for the bird in some instances. For example, making BLM lands exclusion could push development onto private lands.

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

<a href="#">Air</a>	<a href="#">Mineral Materials</a>	<a href="#">Vegetation – Rangeland</a>
<a href="#">ACECs</a>	<a href="#">Non-energy Leasables</a>	<a href="#">Vegetation – Riparian</a>
<a href="#">Cave and Karst Resources</a>	<a href="#">Other Administrative Designations</a>	<a href="#">Vegetation – Weeds</a>
<a href="#">Coal</a>	<a href="#">Paleontology</a>	<a href="#">Visual Resources</a>
<a href="#">Comprehensive Trails and Travel Management</a>	<a href="#">Recreation and Visitor Services</a>	<a href="#">Wild and Scenic Rivers</a>
<a href="#">Cultural Resources and Tribal Coordination???</a>	<a href="#">Renewable Energy</a>	<a href="#">Wild Horses and Burros</a>
<a href="#">Fisheries &amp; Aquatic Wildlife</a>	<a href="#">Soil &amp; Water</a>	<a href="#">Wilderness and Wilderness Study Areas</a>
<a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a>	<a href="#">Special Status Species –Wildlife</a>	<a href="#">Wilderness Characteristics Outside Existing WSAs</a>
<a href="#">Forestry</a>	<a href="#">Special Status Species – Plants</a>	<a href="#">Wildland Fire Management</a>
<a href="#">Lands and Realty</a>	<a href="#">Support</a>	<a href="#">Wildlife</a>
<a href="#">Livestock Grazing</a>	<a href="#">Vegetation – Forest &amp; Woodlands</a>	
<a href="#">Locatable Minerals</a>	<a href="#">Vegetation – General</a>	

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Resources				
Air	None			
Soil & Water	None relevant			
Vegetation – General				
<b>GOAL: Grassland-wide Desired Future Condition</b> The landscape displays an interconnected balance of physical landscape components, including upland terrestrial habitats, riparian areas, wetlands, and clean water.	CNG LRMP 3-2	Yes	Tertiary	N/A
<b>Grassland-wide GOAL:</b> Maintain or restore vegetation, soil and watershed resources.	CNG LRMP 3-2	Yes	Tertiary	N/A
<b>Grassland-wide GOAL:</b> Management strategies are used to restore ecological	CNG LRMP 3-2	Yes	Tertiary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
integrity, productivity and sustainability over time.				
<b>Grassland-wide GOAL:</b> Adaptive management strategies are used to gain understanding during project implementation.	CNG LRMP 3-2	Yes	Tertiary	N/A
<b>Grassland-wide Objective:</b> Within 10 years after signing the Record of Decision (ROD), reassess Vegetation Properly Functioning Condition of ecosystems on the Grassland and adjacent areas, to determine if resources are moving toward Desired Future Conditions.	CNG LRMP 3-2	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Desired Future Condition Insects and disease are allowed to play their natural role in ecosystem dynamics to the extent compatible with other resource objectives or adjacent land use.	CNG LRMP 3-3	Yes unless there is extensive defoliation associated with it.	Secondary	N/A
<b>Action: Grassland-wide Guideline</b> Grasshopper and Mormon cricket management is carried out under the most current EIS for the Rangeland Grasshopper Cooperative Management Program in cooperation with USDA Animal and Plant Health Inspection Service, Plant Protection and Quarantine (APHIS-PPQ) personnel.	CNG LRMP 3-3	NA: Would not be negative impact since FS has control of timing, location and intensity of control.	Secondary	N/A
Vegetation – Forest & Woodlands	NONE			
Vegetation – Rangeland				
<b>GOAL: Grassland-wide Desired Future Condition</b> Rangelands reflect a mosaic of multiple-aged shrubs, forbs, and grasses with emphasis on maintaining or recreating diverse plant communities. Rangelands are functioning to maintain life form diversity, production, nutrient cycling, energy flow, and the hydrologic cycle.	CNG LRMP 3-8	Yes	Secondary	N/A
<b>GOAL: Grassland-wide Desired Future Condition</b> Vegetation management treatments maintain or diversify the	CNG LRMP 3-8	Yes	Secondary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
mosaic of shrub steppe plant communities while reducing habitat fragmentation. Most of the altered sagebrush steppe has also been diversified by the addition of various desirable grasses, forbs, and shrubs, including native species.				
<b>GOAL: Grassland-wide Desired Future Condition</b> Stability of sand dunes and old Lake Bonneville terraces is maintained. Mountain brush vegetation is trending toward a late seral ecological status.	CNG LRMP 3-8	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Emphasize the retention of native vegetation where it currently exists.	CNG LRMP 3-8	Yes	Tertiary	N/A
<b>Grassland-wide GOAL:</b> Use vegetation management in achieving a broad array of multiple-use and ecosystem management objectives, including maintenance, improvement, and restoration of scenery, wildlife habitat, biological diversity, riparian and watershed condition, and vegetation structure, composition and distribution.	CNG LRMP 3-8	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Treat bulbous bluegrass dominated sites and revegetate with desirable native and/or non-native species.	CNG LRMP 3-8	Temporary negative impacts until vegetation regenerates.	Secondary	N/A
<b>Grassland-wide GOAL:</b> Seedings maintain or enhance understory diversity and production to meet livestock grazing, wildlife, watershed and other resource values.	CNG LRMP 3-8	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Sagebrush is managed to maintain current levels of sagebrush in the >15% canopy cover class--about 60% of the Grassland. Emphasis will be on creating and maintaining areas suitable for sage grouse nesting habitat over the long term.	CNG LRMP 3-9	Yes	Secondary	N/A
<b>Grassland-wide Objective:</b>	CNG LRMP 3-9	Not applicable. Modified by	Tertiary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Treat 12,100 acres of sagebrush over the next ten years. See Prescription 6.5: Rangeland Vegetation and Upland Bird Habitat Management.		settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007		
<b>Action: Grassland-wide Standard</b> Do not allow plowing in areas identified on the map as “No Till” areas. Other methods of treatment may be permitted after site-specific analysis.	CNG LRMP 3-9	Yes	Secondary	Agriculture
<b>Action: Grassland-wide Standard</b> Conduct a risk assessment for all sagebrush herbicide treatments, including aerial applications, using the most current Multi-Regional Risk Assessment.	CNG LRMP 3-9	Yes	Tertiary	N/A
<b>Action: Grassland-wide Standard</b> Areas where threetip sagebrush ( <i>Artemisia tripartita</i> ), rabbitbrush, and horsebrush have canopy cover values of greater than 5 percent will be carefully evaluated before treatment due to their ability to sprout after disturbance.	CNG LRMP 3-9	Yes	Tertiary	N/A
<b>Action: Grassland-wide Guideline</b> Emphasize native plant species where they would meet the desired resource conditions. Introduced species may be used in project seedings: (1) where native species would not meet the objectives of erosion control, such as in high use or impact areas, and where the effects on local, native flora is minimal; (2) on sites that are currently dominated by introduced species and the use of non-native species has not degraded the adjacent native flora; (3) on sites where the management objective is to use non-native species in one area to prevent degradation of other natural areas; or (4) when native seed is unavailable or cost prohibitive.	CNG LRMP 3-9	Yes	Secondary	N/A
<b>Action: Grassland-wide Guideline</b>	CNG LRMP 3-10	Yes	Secondary	Agriculture

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Consider adjacent land use during site-specific project analysis and maintain vegetative buffers needed to provide wildlife habitat.				
<b>Action: Grassland-wide Guideline</b> Conduct vegetation manipulations emphasizing desired ecological and multiple-use outcomes in a cost effective matter.	CNG LRMP 3-10	Yes	Tertiary	N/A
<b>Action: Grassland-wide Guideline</b> Maintain unique or difficult-to-replace elements or habitats such as salt desert shrub, aspen, and juniper.	CNG LRMP 3-10	Yes	Tertiary	N/A
<b>Action: Grassland-wide Guideline</b> Maintain existing tree rows for wildlife habitat.	CNG LRMP 3-10	No. Provide predator perches. Sage-grouse avoid these areas.	Secondary	Predation
<b>Action: Grassland-wide Guideline</b> Prioritize bulbous bluegrass treatments in areas that are not meeting wildlife, soil, and vegetative desired future conditions.	CNG LRMP 3-10	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A
<b>Action: Grassland-wide Guideline</b> Consult with the Regional Ecologist when designing restoration treatments and monitoring protocols for bulbous bluegrass projects.	CNG LRMP 3-10	Yes	Tertiary	N/A
<b>Grassland-wide GOAL:</b> Manage sagebrush community habitats to reduce fragmentation and maintain or restore connectivity at the Grassland level.	CNG LRMP 3-12	Yes	Secondary	Agriculture
<b>Grassland-wide Objective:</b> Assess the changes to sagebrush habitats in the Greater Curlew Valley, including canopy cover, adjacent land use, understory conditions, every five years. Coordinate this effort with the Natural Resource Conservation Service and Greater Curlew Valley Sage Grouse Local Working Group.	CNG LRMP 3-12	Yes	Secondary	Agriculture

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
<b>Action: Grassland-wide Guideline</b> Identify and maintain those habitats that have sagebrush with native understory vegetation.	CNG LRMP 3-12	Yes	Secondary	N/A
<b>Action: Grassland-wide Guideline</b> Manage for a mosaic of age and structural sagebrush communities across the Grassland in patches of at least 320 acres.	CNG LRMP 3-12	Yes	Secondary	Prescribed Fire
<b>Action: Guidelines: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Vegetation</b> Bulbous bluegrass dominated sites and sagebrush stands with >25 percent canopy cover will be priorities for treatment.	CNG LRMP 4-15	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A
<b>Action: Guidelines: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Vegetation</b> Consider maintaining dense (>15%) sagebrush cover adjacent to private land that has less sagebrush than is desirable for quality sage grouse habitat.	CNG LRMP 4-15	Yes	Secondary	N/A
Vegetation – Riparian				
<b>GOAL: Grassland-wide Desired Future Condition</b> Aquatic habitats contain sufficient complexity, diversity, and productivity that they can support viable populations of native and desirable non-native species.	CNG LRMP 3-13	Yes	Tertiary	N/A
<b>Grassland-wide GOAL:</b> Maintain and/or restore riparian ecosystems to support populations of associated wildlife and fish species.	CNG LRMP 3-13	Yes	Secondary	N/A
<b>GOAL: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management</b> Maintain the current levels of sagebrush in the >15% canopy cover with an emphasis on treating those acres that are in the greater than 25 percent canopy cover class to maintain sage	CNG LRMP 4-14	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A



Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
grouse habitat.				
<b>GOAL: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management</b> Maintain livestock grazing consistent with other resource values.	CNG LRMP 4-15	Yes	Secondary	Grazing
<b>Objective: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management</b> Within 10 years of signing the Record of Decision, treat 2,500 acres of bulbous bluegrass (2200 acres in >15% cc and 300 acres in < 15% cc) and reseed with native and non-native grass, forb and shrub seed mixtures.	CNG LRMP 4-15	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A
<b>Objective: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management</b> Within 10 years of signing the Record of Decision, treat 9,600 acres of sagebrush with herbicide or other appropriate methods to reduce canopy cover and achieve other resource objectives.	CNG LRMP 4-15	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A
<b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management</b> Design treatments to retain approximately 40 percent of the sagebrush acres in sage grouse nesting habitat (15-24% canopy cover).	CNG LRMP 4-15	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A
Vegetation – Weeds				
<b>GOAL: Grassland-wide Desired Future Conditions</b> Management is proactive to avoid introduction or spread of exotic and noxious weeds.	CNG LRMP 3-8	Yes	Secondary	Invasive Species
<b>Action: Grassland-wide Standard</b> Invasive species such as noxious weeds will be treated to contain or control as appropriate using IPM methods and following the most recent version of the Caribou-Targhee Noxious Weed Strategy.	CNG LRMP 3-9	Yes	Choose an item.	Choose an item.

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Fisheries & Aquatic Wildlife	None			
Wildlife				
<b>GOAL: Grassland-wide Desired Future Conditions</b> Habitats contain sufficient complexity, diversity, and productivity that they can maintain viable populations of native and desirable non-native species. Native wildlife species are present in amounts and distribution similar to historic patterns including species that were once listed, or proposed for listing, as threatened or endangered under the ESA, or listed as sensitive by the Regional Forester.	CNG LRMP 3-11	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Provide habitat that contributes to State wildlife management plans.	CNG LRMP 3-11	Yes	Secondary	Hunting
<b>Grassland-wide GOAL:</b> Maintain or restore habitats for healthy, productive, and diverse native and desired non-native wildlife populations.	CNG LRMP 3-11	Yes	Secondary	N/A
<b>Grassland-wide GOAL:</b> Protect, restore, enhance and manage habitat of migratory birds and prevent the further loss or degradation of remaining habitats (USFWS/FS MOU 2001).	CNG LRMP 3-12	Yes	Secondary	N/A
<b>Action: Grassland-wide Guideline</b> Desired non-native wildlife species should be retained in the Grassland where not in conflict with other resource objectives.	CNG LRMP 3-12	Yes	Tertiary	N/A
Special Status Species – Wildlife				
Sage-grouse				
<b>Grassland-wide GOAL:</b> Habitat conditions on the Grassland contribute to sustaining populations of sage and Columbian sharp-tailed grouse in the Greater Curlew Valley.	CNG LRMP 3-12	Yes	Primary	N/A
<b>Grassland-wide GOAL:</b>	CNG LRMP 3-12	Yes	Primary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Continue coordination with the Greater Curlew Valley Sage Grouse Local Working Group and other interested parties to manage sage grouse populations on the Curlew National Grassland.				
<b>Grassland-wide GOAL:</b> Maintain and increase, where possible, the distribution and abundance of sage grouse.	CNG LRMP 3-12	Yes	Primary	N/A
<b>Grassland-wide Objective:</b> Build a blind for lek observation by 2005.	CNG LRMP 3-13	No. Not implemented.	Secondary	Human
<b>Grassland-wide Objective:</b> Develop a map in cooperation with Idaho Department of Fish and Game to identify functional and degraded breeding habitat and winter habitat within two years of signing the Record of Decision.	CNG LRMP 3-13	Yes	Primary	N/A
<b>Action: Grassland-wide Standard</b> The habitat requirements of management indicator species (MIS) will be considered in all resource development projects. The MIS for sagebrush habitat is sage grouse and for riparian/wetland areas is a breeding bird complex.	CNG LRMP 3-12	Yes	Primary	N/A
<b>Action: Grassland-wide Guidelines</b> Management activities will consider proximity to active lek locations during site-specific project planning.	CNG LRMP 3-13 Forest WL GIS layer for lek locations.	Yes	Primary	Human
<b>Action: Grassland-wide Guidelines</b> If management actions would impact courtship, limit physical, mechanical and audible disturbances within the breeding complex during the breeding season (March – May) within three hours of sunrise or sunset.	CNG LRMP 3-13	Yes	Primary	Human
<b>Action: Grassland-wide Guidelines</b> Where management actions may disturb nesting grouse, avoid manipulation or alteration of vegetation during the nesting	CNG LRMP 3-13	Yes	Primary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
period (May-June).				
<p><b>Action: Standard: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Wildlife</b> Do not treat sagebrush within 0.25 miles of an active sage grouse lek.</p>	CNG LRMP 3-16 Forest WL GIS layer for lek locations.	No. Not restrictive enough according to recent guidelines.	Primary	N/A
<p><b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Wildlife</b> Time treatment practices to provide the least impact to wildlife with emphasis on upland game birds.</p>	CNG LRMP 3-16	Yes	Primary	Human
<p><b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Wildlife</b> Current guidelines for sage and sharp-tailed grouse management will be used as a basis to develop site-specific recommendations for proposed sagebrush treatments. Lek buffers as described in the most current guidelines do not apply to the Grassland, because of the highly fragmented nature of the area and the distance that hens are known to move to nest (Biologist Meeting 10/24/01). Rationale for deviation from the other guidelines will be identified in the site-specific project analysis.</p>	CNG LRMP 3-16 Forest WL GIS layer for lek locations.	Yes as modified by the settlement agreement in addition to lek locations.	Primary	N/A
<p><b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Wildlife</b> Areas of vegetation treatment will consider sagebrush canopy cover, understory diversity and proximity to known active lek sites. Higher priority will be given to treatments of sagebrush in the greater than 25% canopy cover class and areas with limited understory diversity.</p>	CNG LRMP 3-16	Not applicable. Modified by settlement agreement between ID WL Federation, Nat. WL Federation and Western Watersheds. July 27, 2007	Tertiary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
<p><b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Wildlife</b></p> <p>When implementing vegetation seeding treatments, provide for a seed mix with species that are preferred by native upland birds during the pre-nesting, nesting and brood-rearing periods, where possible. See Appendix C.</p>	CNG LRMP 3-16	Yes	Secondary	N/A
General Wildlife				
<p><b>GOAL: Grassland-wide Desired Future Conditions</b></p> <p>Habitats contain sufficient complexity, diversity, and productivity that they can maintain viable populations of native and desirable non-native species. Native wildlife species are present in amounts and distribution similar to historic patterns including species that were once listed, or proposed for listing, as threatened or endangered under the ESA, or listed as sensitive by the Regional Forester.</p>	CNG LRMP 3-11	Yes	Secondary	N/A
<p><b>Grassland-wide GOAL:</b></p> <p>Proactively manage habitats for sensitive species to preclude from listing under the Endangered Species Act. Manage habitats to assist with recovery of threatened, endangered and proposed wildlife and fish populations.</p>	CNG LRMP 3-11	Yes	Secondary	N/A
Special Status Species – Plants				
<p><b>Grassland-wide GOAL:</b></p> <p>Provide necessary protection and management to conserve listed threatened, endangered and sensitive plant species.</p>	CNG LRMP 3-9	Yes	Tertiary	N/A
<p><b>Action: Grassland-wide Standard</b></p> <p>Information on the presence of listed threatened, endangered or sensitive plant species will be included in all assessments for vegetation and/or ground disturbing management activities. Appropriate enhancement, protection and mitigation measures will be applied to the management</p>	CNG LRMP 3-9	Yes	Tertiary	N/A

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
activities.				
Wild Horses and Burros	None			
Cultural Resources and Tribal Coordination				
<b>GOAL: Grassland-wide Desired Future Conditions</b> Tribal treaty rights and other Federal trust responsibilities are met. Tribal governments are involved in Federal agency planning, decision-making, and implementation of programs.	CNG LRMP 3-14	Yes	Tertiary	N/A
<b>GOAL: Grassland-wide Desired Future Conditions</b> Agencies recognize the tribes' right to self-determination and control of their resources and their relationship both among themselves and with non-Indian governments, organizations, and persons.	CNG LRMP 3-14	Yes	Tertiary	N/A
<b>GOAL: Grassland-wide Desired Future Conditions</b> Functional restoration of the ecosystem provides the capability to support harvestable levels of species of interest to the tribes.	CNG LRMP 3-14	Yes	Primary	Hunting
<b>Action: Grassland-wide Standard</b> Consultation procedures and intergovernmental agreements with the tribes to guide future cooperative efforts will comply with protocols set forth in the National Resource Book on American Indian and Alaska Native Relations Working Draft 1995 or its successor.	CNG LRMP 3-14	Yes	Tertiary	N/A
Wildland Fire Management				
<b>GOAL: Grassland-wide Desired Future Conditions</b> Wildland fire is actively suppressed, using the appropriate management response, to protect public safety and resource values.	CNG LRMP 3-3	Yes	Secondary	Wildfire
<b>Grassland-wide GOAL:</b> Suppress fire in a safe, cost effective manner where necessary to protect human life and safety, developments, structures, and sensitive resource values.	CNG LRMP 3-3	Yes	Secondary	Wildfire

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
<b>Grassland-wide GOAL:</b> Coordinate fuel and vegetation management strategies with local governments, tribes, agencies, landowners to reduce the risk from wildland fires.	CNG LRMP 3-3	Yes	Secondary	Wildfire
<b>Grassland-wide GOAL:</b> Identify areas where prescribed fire is limited, inappropriate, or undesirable. Implement other management actions that reduce the undesirable effects of wildland fire.	CNG LRMP 3-3	Yes; As modified by the settlement agreement.	Secondary	Prescribed Fire
<b>Grassland-wide GOAL:</b> Use prescribed fire, alone or with other management activities to restore or maintain desirable vegetative communities and ecosystem processes.	CNG LRMP 3-3	Yes; As modified by the settlement agreement.	Secondary	Prescribed Fire
<b>Action: Grassland-wide Standard</b> Fire is aggressively suppressed to protect public safety as necessitated by the intermixed land ownership pattern	CNG LRMP 3-3	Yes	Secondary	Wildfire
<b>Action: Grassland-wide Guideline</b> During wildland fires minimize impacts on resources while achieving suppression goals.	CNG LRMP 3-3	Yes	Secondary	Wildfire
Wilderness Characteristics Outside Existing WSAs	NONE			
Cave and Karst Resources	NONE			
Visual Resources	None Relevant			
Resource Uses				
Forestry	NONE			
Livestock Grazing				
Paleontological Resources	None Relevant			
<b>GOAL: Grassland-wide Desired Future Conditions</b> Livestock grazing levels are sustainable and contribute to a stable social and economic foundation. Grazing systems are designed to promote plant and animal diversity and to move the Grassland toward desired future conditions of other resources.	CNG LRMP 3-18	Yes	Secondary	Grazing
<b>Grassland-wide GOAL:</b> The level of domestic livestock grazing is managed to be	CNG LRMP 3-18	Yes	Secondary	Grazing

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
compatible with the desired conditions of resources including but not limited to the maintenance of organic ground cover, nutrient cycling, seed production, wildlife habitat and the restoration and maintenance of riparian communities.				
<b>Grassland-wide Objective:</b> Within three years of signing the ROD, Allotment Management Plans will be updated for the Curlew Valley Association and the Buist Association fields.	CNG LRMP 3-18	Yes	Secondary	Grazing
<b>Grassland-wide Objective:</b> Within two years of signing the ROD, develop a monitoring protocol for livestock utilization monitoring and recording on the Grassland, following the Caribou- Targhee Rangeland Monitoring Protocol and Forest Service Handbook direction.	CNG LRMP 3-18	Yes	Tertiary	Grazing
<b>Action: Grassland-wide Standard</b> Implement the riparian grazing management protocol through the Annual Operating Instructions and updated Allotment Management Plans (AMPs). (See objective #2 above)	CNG LRMP 3-18	Yes	Secondary	Grazing
<b>Action: Grassland-wide Standard</b> Apply utilization levels, as shown in the direction for Prescription Area 6.5.	CNG LRMP 3-18	Yes. Under normal precipitation this is adequate when grazing nesting habitat. 25% of the grasslands are grazed during the nesting season. Habitat Condition Trend, Population Trend, and Viability Analysis for the Curlew National Grassland (Timothy and Orme 2004).	Secondary	Grazing
<b>Action: Grassland-wide Standard</b> Allow no livestock grazing before seed set of the second growing season after natural fires and rangeland planting or	CNG LRMP 3-18	Yes	Secondary	Grazing



Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
seeding. If monitoring shows that this is not adequate to meet resource needs, defer livestock grazing as necessary.				
<b>Action: Grassland-wide Guidelines</b> Ramps should be installed on all stock watering tanks to allow small animal entrance and escape.	CNG LRMP 3-18	Yes	Secondary	Water Development
<b>Action: Grassland-wide Guidelines</b> When constructing livestock water developments, fence springs from livestock and return overflow to the original channel. Exclosures are designed to maintain the vegetation community and hydrologic function of the spring.	CNG LRMP 3-18	Yes. Depending on the type of fence.	Secondary	Water Development
<b>Action: Standard: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Livestock Management</b> Apply livestock utilization levels, as measured by key area <sup>1</sup> concept, unless determined otherwise through the interdisciplinary team process. Average percent utilization of upland herbaceous vegetation across the Grassland will be 50 percent by dry weight each year. Allowable use levels in individual pastures, however, will be determined in the Allotment Planning Process and Annual Operating meetings.	CNG LRMP 4-17	Yes	Secondary	Grazing
<b>Action: Guideline: Prescription 6.5 – Rangeland Vegetation And Upland Bird Habitat Management, Livestock Management</b> In pastures dominated by crested wheatgrass, higher use levels (>50% by dry weight) may be prescribed to maintain overall plant health and vigor. Use levels may be lower (35 to 45% by dry weight) in pastures dominated by native vegetation and in areas of 16-25 percent sagebrush canopy	CNG LRMP 4-17	Yes. Under normal precipitation this is adequate when grazing nesting habitat. 25% of the grasslands are grazed during the nesting season. Habitat Condition Trend, Population Trend, and Viability Analysis for the	Secondary	Grazing

<sup>1</sup> **Key Area** - A relatively small portion of rangeland which because of its location, grazing or browsing value, and/or use, serves as a monitoring and evaluation site. A key area guides the general management of the entire area of which it is a part, and will reflect the overall acceptability of current grazing management over the range.

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat								
cover to leave adequate residual vegetation for hiding cover. These levels would be determined using an interdisciplinary, adaptive management process and will likely change from year to year.		Curlew National Grassland (Timothy and Orme 2004).										
Recreation and Visitor Services												
<b>Grassland-wide GOAL:</b> Maintain or increase developed site capacity, as needed, on the Grassland.	CNG LRMP 3-15	No	Tertiary	Infrastructure								
<b>Action: Grassland-wide Standard</b> Do not locate new recreational facilities within Riparian/Wetland Areas (RWAs).	CNG LRMP 3-15	Yes	Secondary	Infrastructure								
<b>Grassland-wide GOAL:</b> Provide quality dispersed recreation opportunities.	CNG LRMP 3-15	No	Secondary	Choose an item.								
<b>Action: Grassland-wide Guideline</b> Low-development-level facilities should be provided at heavily used dispersed areas to prevent resource damage and protect public health and safety.	CNG LRMP 3-15	Yes	Secondary	Infrastructure								
<b>Action: Grassland-wide Guidelines</b> Manage dispersed recreation use such that activities do not adversely impact wildlife species such as upland game birds during critical periods of the annual life cycle.	CNG LRMP 3-15	Yes	Primary	Infrastructure								
Comprehensive Trails and Travel Management												
<b>Grassland-wide GOAL:</b> The Forest road and trail system is cost effective and integrates human needs with those of other resource values, as described in the Roads Analysis.	CNG LRMP 3-14	Yes	Secondary	Infrastructure								
<b>Action: Grassland-wide Standard</b> The following table defines access allowable on the Grassland:	CNG LRMP 3-14	No for snow season with snow machines.	Secondary	Infrastructure								
<table border="1"> <thead> <tr> <th>Season</th> <th>Type of Access</th> <th>Cross-Country Travel</th> <th>Road &amp; Trail Travel</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Season	Type of Access	Cross-Country Travel	Road & Trail Travel								
Season	Type of Access	Cross-Country Travel	Road & Trail Travel									

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management				Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Snow-free	Pedestrian/ Horse	Yes	Yes				
	Mtn. Bike/ Mechanized/ Motorized	No	Designated Routes				
Snow Season	Winter non-motorized and snow machine	Yes	Yes				
<b>Action: Grassland-wide Guideline</b> Seasonal vehicle closures will be one of the methods used as needed to provide security areas for wildlife.				CNG LRMP 3-14	Yes	Secondary	Infrastructure
Lands and Realty							
<b>Grassland-wide GOAL:</b> Adjustments in landownership are made through sale and/or exchanges to facilitate administration of Federal lands.				CNG LRMP 3-6	Yes	Secondary	Agriculture
<b>Grassland-wide GOAL:</b> Utility corridors are minimized to reduce fragmentation.				CNG LRMP 3-6	Yes	Secondary	Infrastructure
<b>Grassland-wide GOAL:</b> Public lands are easily accessible. Road management follows the latest Roads Analysis for the Curlew.				CNG LRMP 3-6	Yes	Secondary	Infrastructure
<b>Action: Grassland-wide Standards</b> Land acquisitions, exchanges, and right-of-ways will be in compliance with current National policy and for the purpose of consolidation and improving management.				CNG LRMP 3-6	Yes	Tertiary	Infrastructure
<b>Action: Grassland-wide Standards</b> Allow for essential access for repair and maintenance of facilities within energy corridors.				CNG LRMP 3-6	No	Tertiary	Infrastructure
<b>Action: Grassland-wide Standards</b> Bury all new utility lines of 50 Kv or less.				CNG LRMP 3-6	Yes	Secondary	Infrastructure

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
<b>Action: Grassland-wide Guidelines</b> Consolidate facilities within existing energy corridors, where practical.	CNG LRMP 3-6	Yes	Secondary	Infrastructure
<b>Action: Grassland-wide Guidelines</b> Proponents of new facilities within existing corridors must demonstrate clearly that the proposal is in the public interest, and that no other reasonable alternative exists to public land routing.	CNG LRMP 3-6	Yes	Secondary	Infrastructure
<b>Action: Grassland-wide Guidelines</b> Allow special uses that can be coordinated with other resources, and establish and maintain current appraisal data and user fees for all Special-Use Permits.	CNG LRMP 3-6	Yes	Tertiary	N/A
<b>Coal – SEE <a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a></b>	CNG LRMP 3-7			
Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)				
<b>GOAL: Grassland-wide Desired Future Conditions</b> Mineral resources are available for development, consistent with other resource uses.	CNG LRMP 3-7	No. Needs to be more specific.	Tertiary	N/A
<b>Grassland-wide GOAL:</b> The use and protection of other resource values is integrated with the exploration and development of mineral and energy resources on the Grassland, including oil and gas.	CNG LRMP 3-7	Yes	Secondary	Oil and Gas
<b>Action Grassland-wide Standard</b> The Grassland is open to exploration and development and production of locatable, solid leasable and mineral material resources. If significant interest in oil and gas leasing develops complete an EA/EIS for oil and gas leasing and amend the CNG Plan.	CNG LRMP 3-7	No.	Secondary	Oil and Gas
<b>Action: Grassland-wide Guidelines</b> When analyzing mineral development proposals, provide	CNG LRMP 3-8	Yes	Secondary	Oil and Gas

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
safeguards to protect surface resource values.				
<b>Locatable Minerals SEE <a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a></b>	CNG LRMP 3-7			
Mineral Materials				
GOAL: Grassland-wide Desired Future Conditions Mineral resources are available for development, consistent with other resource uses.	CNG LRMP 3-7	No. Needs to be more specific.	Tertiary	Oil and Gas
<b>Grassland-wide GOAL:</b> The use and protection of other resource values is integrated with the exploration and development of mineral and energy resources on the Grassland, including oil and gas.	CNG LRMP 3-7	Yes	Secondary	Oil and Gas
Action: <b>Grassland-wide Standard</b> The Grassland is open to exploration and development and production of locatable, solid leasable and mineral material resources. If significant interest in oil and gas leasing develops complete an EA/EIS for oil and gas leasing and amend the CNG Plan.	CNG LRMP 3-7	No	Secondary	Oil and Gas
Action: Grassland-wide Guidelines Common minerals – give priority to the use of currently developed common mineral (natural gravel and hard rock) material sources over new undeveloped sources. Exceptions should be made when existing sources are unable to economically supply the quality and quantity of material needed or when conflicts with other resource uses are found to be unacceptable.	CNG LRMP 3-8	Yes but needs to be more specific.	Secondary	Hard Rock Mining
Action: Guidelines When analyzing mineral development proposals, provide safeguards to protect surface resource values.	CNG LRMP 3-8	Yes	Secondary	Hard Rock Mining
<b>Non-energy Leasables SEE <a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a></b>	CNG LRMP 3-7			
<b>Renewable Energy SEE <a href="#">Fluid Minerals (Oil and Gas, Tar</a></b>	CNG LRMP 3-7			

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
<a href="#">Sands, and Geothermal Resources</a>				
Special Designations	NONE			
ACECs (Administrative Designations)	NONE			
Wilderness and Wilderness Study Areas (Administrative Designations)	NONE			
Wild and Scenic Rivers	NONE			
Other Administrative Designations				
<b>Action: Standards: Prescription 3.4.1 – Special Wildlife Areas, Vegetation</b> Native and non-native grass, forb and shrub species will be used in the composition for revegetation after disturbance and reflect those species preferred by native grouse for pre-nesting, nesting and brood rearing.	CNG LRMP 4-11	Yes	Secondary	N/A
<b>Action: Standards: Prescription 3.4.1 – Special Wildlife Areas, Vegetation</b> Vegetation treatments are allowed when they meet wildlife resource goals of this prescription.	CNG LRMP 4-11	Yes	Secondary	N/A
<b>Action: Standard: Prescription 3.4.1 – Special Wildlife Areas, Wildlife</b> Treatments and developments will emphasize maintenance and improvement of wildlife habitat.	CNG LRMP 4-11	Yes	Secondary	N/A
Action: [Insert allowable use #1]				
Support	NONE			
Interpretation & Environmental Education				
<b>Grassland-wide GOAL:</b> Promote opportunities for additional wildlife viewing and interpretation.	CNG LRMP 3-11	No	Secondary	Human
Transportation Facilities	NONE			
Health & Safety	NONE			
GOAL: [Insert goal #2]				

Current Management – Curlew National Grassland (Caribou-Targhee National Forest)

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Direction Specificity	Threat
Objective: [Insert objective #1]				
Action: [Insert management action #1]				
Action: [Insert management action #2]				
Action: [Insert allowable use #1]				



**US Department of the Interior  
Bureau of Land Management**

**Greater Sage-Grouse Resource Management Plan  
Amendments and Environmental Impact  
Statements**

**Western Region**

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**CURRENT MANAGEMENT  
[OWYHEE FIELD OFFICE]**

**FEBRUARY 16, 2012**

**FOR INTERNAL BLM AND FOREST SERVICE USE ONLY – NOT FOR  
DISTRIBUTION**



## To Western Sage-grouse RMPA/EIS ID Teams:

This document is intended for internal use by the BLM and Forest Service Field Offices for the Greater Sage-Grouse RMPAs/EISs. Current management (No Action alternative) provides a useful baseline for comparison of environmental effects (including cumulative effects) and demonstrates the consequences of not meeting the need for the action. Development of the Greater Sage-Grouse RMPAs/EISs current management will include reviewing and analyzing relevant goals, objectives, and management actions and allocations (descriptions of goals, objectives, and management actions and allocations is provided below) related to sage-grouse/habitat protection in existing BLM and Forest Service land use plans. This process will include documenting those goals, objectives, and management actions and allocations to aid in developing the No Action alternative in the RMPAs/EISs.

**Current Management Matrix** (provided at the end of these instructions). Field Office IDT members should use the current management matrix to capture current management relevant to sage-grouse/habitat protection. The intent is not to repeat the entire ROD for a land use plan, but rather document only the relevant goals, objectives, and management actions and allocations related to sage-grouse/habitat. The matrix includes an exhaustive list of resource and resource use topics that could possibly apply to a planning area/land use plan. However, not all resources/resource uses in the matrix may apply to all existing land use plans. Field Offices need to only provide information for those resources/resource uses that apply to 1) the land use plan under consideration, and 2) the resource/resource use **directly** or **indirectly** related to sage-grouse/habitat management.

## Steps in Documenting Current Management

1. **Column 1 – Current Management: Capture goals, objectives, and management actions and allocations relevant to sage-grouse/habitat protection.** The land use plan decisions establish goals and objectives (desired outcomes) for resources and resource uses and the allowable uses and management actions needed to achieve those goals and objectives. More specifically, **desired future conditions or desired outcomes are stated as goals and objectives**. Goals are broad statements of desired outcomes (plan-wide and resource or resource-use specific) and generally are not quantifiable or measurable. Objectives are more specifically desired conditions or outcomes to meet the resource/resource use goal.

Management actions and allowable uses are designed to achieve the objectives. Management actions include management measures that will guide future and day-to-day activities. Allowable uses indicate which uses are allowed, restricted, or prohibited, and may include stipulations. Allowable uses also identify lands where specific uses are excluded to protect resource values, or where certain lands are open or closed in response to legislative, regulatory, or policy requirements.

2. **Column 2 – Source Data: Document the source data related to the management action/allocation.** Include the GIS and other data that goal, objective, and management action and allocation is based on.
3. **Column 3 – Preliminary Assessment: Perform preliminary assessment of management action/allocation.** Include results of preliminary analysis (i.e., overlays) to determine status of sage-grouse/habitat protections (Example – FO excludes ROWs of X% of priority habitat).
4. **Column 4 – Management Adequacy: Assess whether goals, objectives, and management actions and allocations are adequate related to sage-grouse/habitat protection.** A “Not Adequate” determination will require an amendment to the land use plan.

<a href="#">Air</a>	<a href="#">Mineral Materials</a>	<a href="#">Vegetation – Rangeland</a>
<a href="#">ACECs</a>	<a href="#">Non-energy Leasables</a>	<a href="#">Vegetation – Riparian</a>
<a href="#">Cave and Karst Resources</a>	<a href="#">Other Administrative Designations</a>	<a href="#">Vegetation – Weeds</a>
<a href="#">Coal</a>	<a href="#">Paleontology</a>	<a href="#">Visual Resources</a>
<a href="#">Comprehensive Trails and Travel Management</a>	<a href="#">Recreation and Visitor Services</a>	<a href="#">Wild and Scenic Rivers</a>
<a href="#">Cultural Resources</a>	<a href="#">Renewable Energy</a>	<a href="#">Wild Horses and Burros</a>
<a href="#">Fisheries &amp; Aquatic Wildlife</a>	<a href="#">Soil &amp; Water</a>	<a href="#">Wilderness and Wilderness Study Areas</a>
<a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a>	<a href="#">Special Status Species –Wildlife</a>	<a href="#">Wilderness Characteristics Outside Existing WSAs</a>
<a href="#">Forestry</a>	<a href="#">Special Status Species – Plants</a>	<a href="#">Wildland Fire Management</a>
<a href="#">Lands and Realty</a>	<a href="#">Support</a>	<a href="#">Wildlife</a>
<a href="#">Livestock Grazing</a>	<a href="#">Vegetation – Forest &amp; Woodlands</a>	
<a href="#">Locatable Minerals</a>	<a href="#">Vegetation – General</a>	

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
<b>Resources</b>					
<b>Air</b>					
<b>Objective: AIRQ I</b> Meet or exceed the National Ambient Air Quality Standards and the Prevention of Significant Deterioration regulations with all authorized actions.					
Action: Limit prescribed burning in juniper/sagebrush/grassland areas to a maximum of 15,000 acres per year (or the equivalent of 100,000 tons of fuels) and average 7,500 acres of prescribed burns per year over the life of the plan. Projected emissions from individual burns will be calculated to assure	<b>All RMP spatial data is available at the ISO in a geodatabase.</b>	Limits acreage of sagebrush habitat loss across the 1,320,000 acre planning area to no more than 1.1% per year.	Y to meet the objective, N for GSG protection–needs to be limited to minimize net loss of sagebrush cover sufficient to provide habitat for sage-grouse (see Tech Ref. 417, 2005). This can be framed by recovery	S	Rx Fire, Conifer Encroachment, and Sagebrush Control

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
compliance with National Ambient Air Quality Standards and Prevention of Significant Deterioration regulations.			timelines expected for xeric/mesic sagebrush habitats...or refined to target juniper encroachment and conifer areas		
<b>Soil &amp; Water</b>					
<b>Objective: SOIL I</b> Improve unsatisfactory and maintain satisfactory watershed health/condition on all acres.					
Action: Implement grazing practices that during and at the end of the grazing season provide adequate amounts of ground cover (determined on an ecological site basis) to support proper infiltration, maintain soil moisture, stabilize soils, and maintain site productivity.		Provides protection across the planning area when implemented through Idaho Standards of Rangeland Health and Guidelines for Livestock Grazing Mgmt.	Y - cover amounts to provide protection from erosion may be less than what is needed to provide adequate/desired cover for nesting and early brood rearing.	S	Livestock Impacts
Action: Implement grazing practices that improve or maintain native rangeland species to attain composition, density, aerial cover and vigor appropriate to site potential.		Provides protection across the planning area when implemented through Idaho Standards of Rangeland Health and Guidelines for Livestock Grazing Mgmt.	Y	T	Livestock Impacts
Action: Limit OHMV use in high erosion hazard		Would potentially limit disturbance on	Y/N – Is dependent upon completion of travel	T	Human Disturbance

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
watersheds, watersheds at-risk or in unsatisfactory condition.		specified soil types within the planning area that may provide protections to habitat and grouse.	mgmt. planning efforts (not complete, but legislated by P.L. 111-11, 2009).		
Action: Grazing systems and other activities will be designed to minimize soil erosion caused by surface disturbing activities through proper timing with regard to soil moisture content and range readiness.		Since soil moisture is highest in the late winter/spring, this would provide protection to breeding and nesting habitats.	Y – range readiness criteria are used to delay authorizations until conditions are consistent with this RMP action.	S	Livestock impacts and human disturbance
Action: Provide a minimum of two growing seasons of rest from livestock grazing and other watershed disturbing activities following fires.		Protects grouse displaced by fire events and ensures forb/grass cover availability as habitats recover from fire.	Y	S	Annual Grasslands, Livestock Impacts and Seeded perennial grasslands
Action: Implement a juniper abatement plan for appropriate sites on which juniper is invading.		Protects sagebrush sites from conversion to woodlands avoided by grouse.	Y	P	Conifer Encroachment
<b>Objective: SOIL 2</b> Achieve stabilization of current, and prevent the potential for future, localized accelerated soil erosion problems (particularly on streambanks, roads, and trails). Localized accelerated soil erosion is where humans, by their actions, are responsible for the site					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
specific erosive process.					
Action: Improve or maintain streambank and channel stability as appropriate for the site by managing grazing to limit annual trampling impacts to 10% or less of the linear bank length.		This action limits grazing effects on riparian meadows that are important for late brood-rearing.	Y	T	Livestock Impacts
Action: Limit surface disturbing activities on soils sensitive to compaction or that have a high soil erosion potential rating, or that are exhibiting existing accelerated erosion problems.		Protects degraded/sensitive sites from further degradation.	Y	T	Livestock impacts, Infrastructure
<b>Objective: WATR I</b> Meet or exceed State of Idaho water quality standards on all Federally administered waters within the Owyhee Resource Area					
Action: In pastures containing riparian areas categorized as unsatisfactory, non-functioning, or functional-at-risk, or stream segments listed as water quality limited in the current Idaho Division of Environmental Quality 303(d) list, implement grazing practices that make progress towards achieving proper functioning condition and satisfactory riparian condition. These grazing practices will, at a minimum, comply with the Idaho Standards for Rangeland		This action limits grazing effects on riparian meadows that are important for late brood-rearing.	Y	T	Livestock Impacts

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
Health and Guidelines for Livestock Grazing Management, and BMPs and component practices approved in the Idaho Agricultural Pollution Abatement Plan or subsequent plans. See Table RIPN-I and Map RIPN-I for affected areas. Future inventory or monitoring may indicate additional pastures to which this management action will apply.					
Action: Improve or maintain herbaceous vegetation species to attain composition, density, canopy and ground cover, and vigor appropriate for the site. Adequate residual stubble height in an amount appropriate for the site will be present throughout the grazing treatment and overwinter. This pertains to key sedge and rush species which are excellent streambank stabilizers.		This action limits grazing effects on riparian meadows that are important for late brood-rearing.	Y	S	Livestock Impacts
Action: Implement management practices addressing non-grazing impacts to riparian areas where needed and appropriate.		This action limits other authorized uses effects on riparian meadows that are important for late brood-rearing.	N – could be more specific to preclude loss of riparian habitats to actions like mineral materials sites etc.	T	Infrastructure
<b>Vegetation – General</b>					
<b>Objective: VEGE I</b> Improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas.					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage- grouse Relation (P, S, T)	Threat
Action: Implement grazing practices that during and at the end of the grazing season provide adequate amounts of ground cover (determined on an ecological site basis) to support proper infiltration, maintain soil moisture, stabilize soils, and maintain site productivity.		Provides protection across the planning area when implemented through Idaho Standards of Rangeland Health and Guidelines for Livestock Grazing Mgmt.	Y - cover amounts to provide protection of infiltration, soil moisture, and site productivity may be less than what is needed to provide adequate/desired cover for nesting and early brood rearing.	T	Livestock Impacts
Action: Implement grazing practices that improve or maintain native rangeland species to attain composition, density, foliar cover and vigor appropriate to site potential.		Provides protection across the planning area when implemented through Idaho Standards of Rangeland Health and Guidelines for Livestock Grazing Mgmt.	Y	T	Livestock Impacts
Action: Implement prescribed burning practices in areas where it is determined that burning would improve rangeland health and increase plant biodiversity in western juniper and big sagebrush vegetation types. Mechanical and chemical methods may also be used.		Provides for protection of sagebrush sites invaded by western junipers.	N – allowing for burning of sagebrush sites without a framework resulting in no net loss across the planning area (cumulative agency actions and wildfire) or allowable temporary loss may put habitats/populations at risk.	T	Conifer Encroachment
Action: Apply approved noxious weed control		Protects sagebrush habitats from noxious	N – expand to include invasive species rather	T	Weeds

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
methods [Includes burning, mechanical, manual, biological, and chemical control methods as identified in the Vegetation Management EIS (USDI, BLM, 1991)].		weed invasion, but not invasive species invasion.	than just “noxious.” This will allow for treatments to minimize fire recurrence and habitat loss to fire/annual species conversion.		
Action: Implement grazing practices designed to meet Idaho Standards for Rangeland Health and conform to the Guidelines for Livestock Grazing Management (see Appendix LVST-1).		Provides protection across the planning area when implemented through Idaho Standards of Rangeland Health and Guidelines for Livestock Grazing Mgmt.	Y	T	Livestock Impacts
<b>Vegetation – Forest &amp; Woodlands</b>					
<b>Objective: FORS 2</b> Use juniper harvesting to help achieve a desired plant community.					
Action: Manage harvest of western juniper woodlands in accordance with layout and cutting standards in the Owyhee Juniper Woodland Harvest Management Plan (USDI, BLM, October 1987). See Map FORS-1.		Allows for protection of encroached sagebrush habitats from woodland conversion.	Y	S	Conifer Encroachment
<b>Wildlife</b>					
<b>Objective: WDLF 1</b> Maintain or enhance the condition, abundance, structural stage, and distribution of plant communities and					



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
special habitat features required to support a high diversity and desired populations of wildlife.					
Action: Ensure that all activity plans include objectives for maintaining or enhancing habitat for those wildlife species known or likely to occur within the planning area.		Some activity plans (ex. Murphy Sub-region Travel Mgmt. Plan) have included specific objectives to maintain/enhance habitat for sage-grouse. Most activities are designed or have mitigations to address wildlife rather than objectives.	N – need specific and consistent sage-grouse objectives that can be incorporated into activity plans.	T	General
Action: Limit the adverse impacts of various land use activities, management actions and land tenure adjustments to wildlife populations and habitats through implementation of management actions identified in objectives FORS 2, WHRS I, LVST I, FIRE I-4, LAND I-6, LOCM I, FLUM I, MMAT I, RECT I, and HAZM I.		Provides protection as identified above and below.	Y	T	General
Action: Protect and enhance habitat for a diversity of wildlife through implementation of management actions identified in objectives SOIL I and 2, WATR I and 2, VEGE I, RIPN I, FORS		Provides protection as identified above and below.	Y	T	General

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
I and 2, FISH I and 2, RECT 3, WNES I and 2, HAZM I, and ACEC I.					
<p>Action: Adjust overall grazing management practices to ensure that adequate upland forage and cover remains to accommodate the needs of wildlife. Specifically:</p> <ul style="list-style-type: none"> <li>• Limit utilization of key browse species, as measured in the fall, to a maximum of 30% within all deer winter habitat and 50% within all other habitats.</li> <li>• Limit utilization of key upland herbaceous forage species to a maximum of 50% at the time of livestock removal from a pasture.</li> </ul> <p>More restrictive utilization standards may be imposed where necessary to accomplish specific wildlife or other resource objectives.</p>		Sets maximum utilization levels across the planning area.	N – specify seasonal values for sage-grouse habitat/cover objectives. Season of use is important to grouse (spring utilization to 50% will result in temporary lack of cover needed for nest/brood concealment in many years) and regrowth not timely to reduce the effect.	T	Livestock Impacts
<p>Action: Design and implement vegetation treatments to improve habitat where juniper or shrub density is contributing to unsatisfactory habitat conditions. All treatments will be designed to protect scarce, unique and highly productive wildlife habitat types, retain large interconnected blocks of more common</p>		Protects habitat across the planning area.	N for GSG protection– needs to be limited to minimize net loss of sagebrush cover sufficient to provide habitat for sage-grouse (see Tech Ref. 417, 2005). This can be framed by recovery timelines expected for	S	Livestock Impacts, annual grassland, seeded perennial, sagebrush control, prescribed

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
<p>habitat types and accommodate specific wildlife habitat requirements including migration corridors for big game. Reseed burns with a variety of shrubs, forbs and grasses. Rest all burns and seedings from livestock grazing for a minimum of two growing seasons following treatment.</p>			<p>xeric/mesic sagebrush habitats...spatial and temporal scales are important before authorizing an activity that may cumulatively limit habitat effectiveness over a given spatial extent or span of time.</p>		<p>fire.</p>
<p>Action: Ensure water availability for wildlife by providing unrestricted access to all livestock waters, requiring that where necessary, waters are left on following removal of livestock and constructing additional water developments where water is determined to be limiting. Ensure that water is available at intervals of no more than three miles apart in big game habitat.</p>		<p>Provides access to water.</p>	<p>N – Effects of West Nile Virus were not factored into this. Constructing new water developments in GSG habitat may amplify adverse effects of the virus and habitat modification in areas previously subjected to little disturbance.</p>	<p>T</p>	<p>West Nile Virus</p>
<p>Action: Retain all public land within crucial and other high quality wildlife habitats unless exchanging for land of equal or higher value and acquire additional high quality habitat through purchase or exchange with willing landowners. These include but are not limited to wetland/riparian habitats, crucial big game winter habitat and isolated tracts and shrublands adjacent to agricultural areas that</p>		<p>Promotes “block mgmt.” and retention of land that supports habitat important to GSG.</p>	<p>Y</p>	<p>T</p>	<p>Urban/Exurban Development, agricultural expansion.</p>

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
provide important cover for upland game. Isolated tracts will be grazed only if needed to maintain or improve wildlife habitat.					
Action: Protect and enhance habitat for wildlife at all developed springs and selected undeveloped springs, wet meadows, reservoirs, and stream riparian reaches by fencing to exclude livestock. Close all exclosures to livestock grazing for the life of this plan except where it is determined that controlled grazing is necessary to achieve a specific resource objective.		Protects late brood rearing habitats. Implemented in grazing permit renewal efforts/Idaho Standards of RLH/Guidelines for Livestock grazing management.	Y	S	Livestock Impacts
<b>Special Status Species – Wildlife</b>					
<b>Sage-grouse</b>					
<b>Objective: SPSS I</b> Manage special status species and habitats to increase or maintain populations at levels where their existence is no longer threatened and there is no need for listing under the Endangered Species Act of 1973, as amended. See Tables SPSS-I and SPSS-2.					
Action: 9 Identify, protect, and enhance key sage grouse habitats and populations. Guidance for enhancement and protection is addressed in the		This action provides direction, but does not necessarily address allocations made through specific	N – Needs to specifically address conservation measures from state plan, across land use programs.	P	General

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
Memorandum of Agreement in the 1997 Idaho Sage Grouse Management Plan (March 1998). Subsequent guidance may become available through the development of plans by local sage grouse working groups or similar efforts.		mgmt. actions to be taken to accomplish the objective. The Idaho State Plan was updated in 2006 and the Owyhee Co. LVWG plan was updated in 2000 and is set to be updated again in 2012.			
<b>General Wildlife</b>					
<b>Objective: SPSS I</b> Manage special status species and habitats to increase or maintain populations at levels where their existence is no longer threatened and there is no need for listing under the Endangered Species Act of 1973, as amended. See Tables SPSS-I and SPSS-2.					
Action: I Prepare, revise, and implement Habitat Management Plans (HMPs) and other resource activity plans and cooperate in the development and implementation of Recovery Plans, Conservation Agreements and Strategies and species management plans to ensure that objectives for special status plant and animal species are incorporated and met.		No HMPs have been completed for GSG in the planning area.	N – an HMP to implement conservation measures would provide greater protection to GSG.	T	General

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat			
Action: 4 Acquire additional high quality habitat for special status species through purchase or exchange with willing landowners.		This allows for the acquisition of important properties. Areas within Designated Wilderness have current priority for acquisition.	Y – could be refined to assign priority to GSG habitats within wilderness areas.	T	Urban/Exurban Development, agricultural expansion.			
Action: 14 Facilitate the reintroduction, expansion, or supplemental transplant of special status species into suitable habitats where this is determined to be important to the recovery or management of a species or population.		Allows for augmentation of native species populations.	Y	P	Isolated Populations			
<b>Wild Horses and Burros</b>								
<b>Objective: WHRS I</b> Maintain wild and free-roaming horses in the Owyhee Wild Horse Herd Management Areas (HMAs) at appropriate management levels (AML) within a thriving natural ecological balance.								
Action: 1 Manage wild horses for the appropriate management level (AML) in the Hardtrigger, Black Mountain, and Sands Basin Herd Management Areas (HMAs). See Map WHRS-I and Table WHRS-I for allotment specific details.		Allows for management of WH&B herds.	Y/N – AML allocations allow for grazing of HMAs that often exceeds the capability of the habitat and vegetation, thus out of a “thriving ecological balance.” This cyclic use combined with	T	Livestock (sic) Impacts			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><b>HMA</b></td> <td style="width: 33%; text-align: center;"><b>AML</b></td> <td style="width: 33%; text-align: center;"><b>Population</b></td> </tr> </table>	<b>HMA</b>	<b>AML</b>	<b>Population</b>					
<b>HMA</b>	<b>AML</b>	<b>Population</b>						

Current Management			Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
		<b>Range</b>			livestock grazing allocations/authorizations maintain degraded habitat conditions and little opportunity for recovery, especially in light of unplanned disturbances such as wildfire.		
Hardtrigger	98	66-130					
Black Mtn.	45	30-60					
Sands Basin	49	33-64					
<b>Total</b>	<b>192</b>	<b>129-254</b>					
Action: 2 Allocate forage for wild horses at the AML. See Table WHRS-2 for HMA specific details. AML may be adjusted and the forage allocation will correspond as determined by rangeland monitoring to ensure a thriving natural ecological balance.				SAA	SAA	T	Livestock (sic) Impacts
<b>HMA</b>		<b>Forage allocation (AUMs)</b>					
Hardtrigger		1,176					
Black Mtn.		540					
Sands Basin		588					
<b>Total</b>		<b>2,304</b>					
Action: 4 Manage wild free-roaming horses as a component of the public lands in a manner that maintains or improves the rangeland ecosystem.				SAA	SAA	T	Livestock (sic) Impacts
Action: 5 Retain inactive status on a portion of the Hardtrigger Herd Area. See Table				SAA	Y	T	Livestock (sic) Impacts

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
WHRS-I for details.					
<b>Wildland Fire Management</b>					
<p><b>Objective: FIRE 1</b>                      Suppress wildfires by taking appropriate management response utilizing the range of acceptable acreage limits listed for each fire management zone (FMZ) within the resource area. The current Fire Management Plan (FMP) is reviewed periodically and may be revised in conformance with RMP. See Map FIRE-I.</p>					
<p><b>Action:</b>                      Provide appropriate management response, considering resource values, fire-fighter safety, costs, allowing natural fire to burn to meet resource objectives, in closely monitored opportunities, on all natural and human caused fires to meet suppression standards established. When prescriptive criteria are developed, fires may be managed to meet resource objectives.</p>		Protects habitat across the planning area.	N – needs to be limited to minimize net loss of sagebrush cover sufficient to provide habitat for sage-grouse (see Tech Ref. 417, 2005). This can be framed by recovery timelines expected for xeric/mesic sagebrush habitats...spatial and temporal scales are important before natural fires are allowed to burn. This may cumulatively limit habitat effectiveness over a given spatial extent or span of time.	T	Wildfire, annual grasslands
<p><b>Objective: FIRE 2</b>                      Decrease soil erosion and sediment</p>					



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
yield, restore forage values, and restore upland habitat values and riparian values using fire rehabilitation procedures following a wildfire.					
Action: 1 Waterbar and seed all firelines constructed on slopes of 25% or more to prevent erosion.		Protects habitat across the planning area.	Y – may include use of shrub, grass, and forbs.	T	annual grasslands, seeded perennial
Action: 2 Backfill and reseed all firelines constructed by heavy equipment.		Protects habitat across the planning area.	Y – may include use of shrub, grass, and forbs.	T	annual grasslands, seeded perennial
Action: 3 Apply rehabilitation seed mixtures to meet watershed, wildlife, and riparian objectives.		Protects habitat across the planning area.	Y – may include use of shrub, grass, and forbs.	T	annual grasslands, seeded perennial
<b>Objective: FIRE 3</b> Restore natural disturbance regime to improve rangeland health and the biodiversity of native plant communities, using the example for a Prescribed Fire Activity Plan and the example for a Wilderness Fire Activity Plan.					
Action: Use natural and prescribed fire in big sagebrush and western juniper dominated vegetation communities to burn approximately 105,000 acres. No more than 15,000 acres would be prescribed burned in any given year. The target or goal would be 7,500 acres		Protects habitat across the planning area.	N – remove big-sagebrush from acre allowance unless a framework to address spatial and temporal recovery concerns are incorporated.	S	Conifer encroachment, wildfire, sagebrush control

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
per year.					
<b>Objective: FIRE 5</b> Modify standard suppression techniques to protect sensitive resource values.					
Action: 2 Use any and all available fire suppression techniques to protect the Silver City area, cultural ACECs, and unique wildlife habitat areas.		Protects habitat across the planning area.	N – emphasize important breeding/nesting/winter habitat areas.	T	Wildfire
<b>Resource Uses</b>					
<b>Livestock Grazing</b>					
<b>Objective: LVST I</b> Provide for a sustained level of livestock use compatible with meeting other resource objectives. Resolve issues associated with livestock grazing identified in the allotment management summary. See Appendix LVST-I in the Proposed Owyhee Resource Management Plan and Final Environmental Impact Statement (July 1999).					
Action: 6 Use a minimal level of rangeland developments (e.g., fences, water facilities) to adjust livestock grazing practices to achieve multiple use resource objectives and meet standards for rangeland health.		Protects habitat across the planning area.	Y	T	Livestock Impacts
Action: 8 Exclude livestock grazing from 22,227		Protects habitat across the planning	Y	T	Livestock Impacts

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
acres. Areas excluded from grazing are shown on Map LVST-2.		area.			
<b>Recreation and Visitor Services</b>					
<b>Objective: RECT I</b> Provide for off-highway motor vehicle (OHMV) use on public lands while protecting sensitive resource values.					
<p>Action: I Manage OHMV recreational use and mechanized vehicle recreational use on public lands in accordance with the following designations: See Maps RECT-1, RECT-2, and RECT-4.</p> <p>Open: Off-highway motorized vehicle use is allowed on all public lands without special restrictions, except as otherwise posted: 192 acres.</p> <p>Limited: Off-highway motorized vehicle use is limited to existing roads and trails year-round, except as otherwise posted: 519,442 acres. Off-highway motorized vehicle use is limited to designated roads and trails except as otherwise posted: 698,363 acres. Within the limited use area, competitive use may be permitted on designated routes on 224,265 acres. On 13,959 of these acres competitive use may be permitted on designated routes only from July 1 through November 14.</p> <p>Closed: All lands are closed to off-</p>		<p>Protects habitat across the planning area.</p> <p>This is superseded by Public Law 111-11, 2009, which limits OHMV use to existing roads and trails within Owyhee County until a comprehensive travel management plan is completed for the county (excepting areas where limited to designated routes in the Wilson Creek, Murphy Subregion, and Hemmingway Butte travel mgmt. areas).</p>	Y/N – could be updated to reflect P.L. 111-11.	T	Human Disturbance

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
highway motorized vehicle use year-round: 101,994.					
<p>Action: 2                      Manage over-snow- vehicle (OSV) recreational use on public lands in accordance with the following designations: See Map RECT-3.                      Open: Over snow vehicle use is allowed on all public lands without special restrictions, except as otherwise posted: 864,729 acres.                      Limited: Over snow vehicle use is limited to designated areas, except as otherwise posted: 24,211 acres. Over snow vehicle use is restricted from 12/15 through 3/31, except as otherwise posted: 90,749 acres.                      Closed: All lands are closed to over snow vehicle use: 259,036.                      Closed-IMP: All lands are closed to over snow vehicle use; if released from wilderness consideration, lands are then managed as limited to designated areas: 81,266 acres.</p>		<p>Protects habitat across the planning area.</p> <p>This is superseded by Public Law 111-11, 2009, which limits OMHV use to existing roads and trails within Owyhee County until a comprehensive travel management plan is completed for the county (excepting areas where limited to designated routes in the Wilson Creek, Murphy Subregion, and Hemmingway Butte travel mgmt. areas).</p>	Y/N – could be updated to reflect P.L. 111-11.	T	Human Disturbance
<b>Lands and Realty</b>					
<p><b>Objective: LAND I</b>                      Acquire through exchange, purchase, easement or donation and maintain those lands which have high resource values and to improve the management and administration of the public lands.</p>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
Lands with high resource values will be retained in federal ownership which provides for efficient and effective management and administration.					
Action: 1 Acquire through purchase, exchange, easement or donation, lands that will benefit the management of resource programs including but not limited to wild horses, wildlife, WSA's, ACEC's, riparian, cultural, recreation, etc.		This allows for the acquisition of important properties. Areas within Designated Wilderness have current priority for acquisition.	Y – could be refined to assign priority to GSG habitats within wilderness areas.	T	Urban/Exurban Development, agricultural expansion.
Action: 2 Manage newly acquired lands for the highest potential purpose for which they were acquired. Manage acquired lands with unique or fragile resources to protect those resources. Manage acquired lands without special values or management goals in the same manner as comparable or adjacent public lands.		Allows for protection of acquired lands.	Y	T	Urban/Exurban Development, agricultural expansion.
<b>Special Designations</b>					
<b>ACECs (Administrative Designations)</b>					
<b>Objective: ACEC I</b> Retain existing and designate new areas of critical environmental concern (ACECs) where relevance and importance criteria are met and where special management is needed to protect the values identified.					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
<p>Action: I Designate the following areas of critical environmental concern (ACECs): See Map ACEC-I</p> <ul style="list-style-type: none"> <li>• Guffey Butte/Black Butte Archaeological District (7,750 acres)</li> <li>• Owyhee River Bighorn Sheep Habitat Area (141,796 acres)</li> <li>• Boulder Creek Outstanding Natural Area (6,978 acres)</li> <li>• North Fork Juniper Woodland Outstanding Natural Area (4,204 acres)</li> <li>• Cinnabar Mountain Research Natural Area (277 acres)</li> <li>• Coal Mine Basin Research Natural Area (1,604 acres)</li> <li>• Jump Creek Canyon (612 acres)</li> <li>• McBride Creek Research Natural Area (261 acres)</li> <li>• Pleasant Valley Table Research Natural Area (1,467 acres)</li> <li>• Sommercamp Butte Research Natural Area (440 acres)</li> <li>• Squaw Creek Research Natural Area (150 acres)</li> <li>• The Badlands Research Natural Area (1,833 acres).</li> </ul> <p>The total acreage of the 12 designated</p>		<p>Protects areas designated for the relevant and important values identified.</p>	<p>Y – ensure areas within priority habitat have GSG habitat identified as a relevant and important value.</p>	<p>T</p>	<p>General</p>

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse Relation (P, S, T)	Threat
areas is 167,372 acres.					
Action: 3 Manage designated ACECs with the special management actions identified in Table ACEC-I.		Protects areas designated for the relevant and important values identified.	Y – ensure areas within priority habitat have GSG habitat identified as a relevant and important value.	T	General
Action: 4 Complete enclosure fencing of Squaw Creek RNA/ACEC and a segment of McBride Creek RNA/ACEC within two years.		Protects areas designated for the relevant and important values identified.	Y – ensure areas within priority habitat have GSG habitat identified as a relevant and important value.	T	General



**US Department of the Interior  
Bureau of Land Management**

**Greater Sage-Grouse Resource Management Plan  
Amendments and Environmental Impact  
Statements**

**Western Region**

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**CURRENT MANAGEMENT  
UPPER SNAKE FIELD OFFICE**

**JANUARY 4, 2012**

**FOR INTERNAL BLM AND FOREST SERVICE USE ONLY – NOT FOR  
DISTRIBUTION**



## To Western Sage-grouse RMPA/EIS ID Teams:

This document is intended for internal use by the BLM and Forest Service Field Offices for the Greater Sage-Grouse RMPAs/EISs. Current management (No Action alternative) provides a useful baseline for comparison of environmental effects (including cumulative effects) and demonstrates the consequences of not meeting the need for the action. Development of the Greater Sage-Grouse RMPAs/EISs current management will include reviewing and analyzing relevant goals, objectives, and management actions and allocations (descriptions of goals, objectives, and management actions and allocations is provided below) related to sage-grouse/habitat protection in existing BLM and Forest Service land use plans. This process will include documenting those goals, objectives, and management actions and allocations to aid in developing the No Action alternative in the RMPAs/EISs.

**Current Management Matrix** (provided at the end of these instructions). Field Office IDT members should use the current management matrix to capture current management relevant to sage-grouse/habitat protection. The intent is not to repeat the entire ROD for a land use plan, but rather document only the relevant goals, objectives, and management actions and allocations related to sage-grouse/habitat. The matrix includes an exhaustive list of resource and resource use topics that could possibly apply to a planning area/land use plan. However, not all resources/resource uses in the matrix may apply to all existing land use plans. Field Offices need to only provide information for those resources/resource uses that apply to 1) the land use plan under consideration, and 2) the resource/resource use **directly** or **indirectly** related to sage-grouse/habitat management.

## Steps in Documenting Current Management

1. **Column 1 – Current Management: Capture goals, objectives, and management actions and allocations relevant to sage-grouse/habitat protection.** The land use plan decisions establish goals and objectives (desired outcomes) for resources and resource uses and the allowable uses and management actions needed to achieve those goals and objectives. More specifically, desired future conditions or desired outcomes are stated as goals and objectives. Goals are broad statements of desired outcomes (plan-wide and resource or resource-use specific) and generally are not quantifiable or measurable. Objectives are more specifically desired conditions or outcomes to meet the resource/resource use goal.

Management actions and allowable uses are designed to achieve the objectives. Management actions include management measures that will guide future and day-to-day activities. Allowable uses indicate which uses are allowed, restricted, or prohibited, and may include stipulations. Allowable uses also identify lands where specific uses are excluded to protect resource values, or where certain lands are open or closed in response to legislative, regulatory, or policy requirements.

2. **Column 2 – Source Data: Document the source data related to the management action/allocation.** Include the GIS and other data that goal, objective, and management action and allocation is based on.
3. **Column 3 – Preliminary Assessment: Perform preliminary assessment of management action/allocation.** Include results of preliminary analysis (i.e., overlays) to determine status of sage-grouse/habitat protections (Example – FO excludes ROWs of X% of priority habitat).
4. **Column 4 – Management Adequacy: Assess whether goals, objectives, and management actions and allocations are adequate related to sage-grouse/habitat protection.** A “Not Adequate” determination will require an amendment to the land use plan.

<a href="#">Air</a>	<a href="#">Mineral Materials</a>	<a href="#">Vegetation – Rangeland</a>
<a href="#">ACECs</a>	<a href="#">Non-energy Leasables</a>	<a href="#">Vegetation – Riparian</a>
<a href="#">Cave and Karst Resources</a>	<a href="#">Other Administrative Designations</a>	<a href="#">Vegetation – Weeds</a>
<a href="#">Coal</a>	<a href="#">Paleontology</a>	<a href="#">Visual Resources</a>
<a href="#">Comprehensive Trails and Travel Management</a>	<a href="#">Recreation and Visitor Services</a>	<a href="#">Wild and Scenic Rivers</a>
<a href="#">Cultural Resources</a>	<a href="#">Renewable Energy</a>	<a href="#">Wild Horses and Burros</a>
<a href="#">Fisheries &amp; Aquatic Wildlife</a>	<a href="#">Soil &amp; Water</a>	<a href="#">Wilderness and Wilderness Study Areas</a>
<a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a>	<a href="#">Special Status Species –Wildlife</a>	<a href="#">Wilderness Characteristics Outside Existing WSAs</a>
<a href="#">Forestry</a>	<a href="#">Special Status Species – Plants</a>	<a href="#">Wildland Fire Management</a>
<a href="#">Lands and Realty</a>	<a href="#">Support</a>	<a href="#">Wildlife</a>
<a href="#">Livestock Grazing</a>	<a href="#">Vegetation – Forest &amp; Woodlands</a>	
<a href="#">Locatable Minerals</a>	<a href="#">Vegetation – General</a>	

<b>Current Management</b>	<b>Source Data (GIS data requirements/ source related to management action)</b>	<b>Preliminary Assessment</b>	<b>Management Adequacy Y/N (N=need amendment)</b>	<b>Sage-grouse relation</b>	<b>Threat</b>
<b>Resources</b>					
<b>Air</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Soil &amp; Water</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat																												
Action: [Insert management action #1]																																	
<b>Vegetation – General</b>																																	
<b>GOAL:</b> Ensure the vegetation resources provide for the long-term health and sustainability of the plant community, and meet the needs of fish and wildlife habitat and human uses.	N/A	Adequate		Secondary	N/A																												
Objective: Manage vegetation cover types for desired future condition. <table border="1" data-bbox="176 802 716 1416"> <thead> <tr> <th data-bbox="176 802 621 850">Cover Type</th> <th data-bbox="621 802 716 850">%</th> </tr> <tr> <th data-bbox="176 850 621 899">Vegetation Class</th> <th data-bbox="621 850 716 899">DFC</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="176 899 716 948"><b>Low-elevation Shrub</b></td> </tr> <tr> <td data-bbox="176 948 621 980">Perennial Grass &lt; 15 years</td> <td data-bbox="621 948 716 980">14</td> </tr> <tr> <td data-bbox="176 980 621 1013">Grass/shrub mix 15–30 years</td> <td data-bbox="621 980 716 1013">14</td> </tr> <tr> <td data-bbox="176 1013 621 1045">Shrub/grass mix &gt; 30 years</td> <td data-bbox="621 1013 716 1045">52</td> </tr> <tr> <td data-bbox="176 1045 621 1078">Cheatgrass/weeds</td> <td data-bbox="621 1045 716 1078">&lt;20</td> </tr> <tr> <td colspan="2" data-bbox="176 1078 716 1127"><b>Mid-elevation Shrub</b></td> </tr> <tr> <td data-bbox="176 1127 621 1159">Perennial Grass &lt; 15 years</td> <td data-bbox="621 1127 716 1159">23</td> </tr> <tr> <td data-bbox="176 1159 621 1192">Grass/shrub mix 15–30 years</td> <td data-bbox="621 1159 716 1192">45</td> </tr> <tr> <td data-bbox="176 1192 621 1224">Shrub/grass mix &gt; 30 years</td> <td data-bbox="621 1192 716 1224">23</td> </tr> <tr> <td data-bbox="176 1224 621 1256">Juniper encroachment</td> <td data-bbox="621 1224 716 1256">7</td> </tr> <tr> <td data-bbox="176 1256 621 1289">Cheatgrass/weeds</td> <td data-bbox="621 1256 716 1289">2</td> </tr> <tr> <td colspan="2" data-bbox="176 1289 716 1338"><b>Mountain Shrub</b></td> </tr> </tbody> </table>	Cover Type	%	Vegetation Class	DFC	<b>Low-elevation Shrub</b>		Perennial Grass < 15 years	14	Grass/shrub mix 15–30 years	14	Shrub/grass mix > 30 years	52	Cheatgrass/weeds	<20	<b>Mid-elevation Shrub</b>		Perennial Grass < 15 years	23	Grass/shrub mix 15–30 years	45	Shrub/grass mix > 30 years	23	Juniper encroachment	7	Cheatgrass/weeds	2	<b>Mountain Shrub</b>		These habitat types were not mapped at the time, but we have a Veg layer now we're using for our RMP revision, or use a statewide veg map.	Adequate		Secondary	N/A
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<table border="1"> <tr> <td>Perennial grass/ shrub &lt; 10 years</td> <td>33</td> </tr> <tr> <td>Shrub/perennial grass 10–20 years</td> <td>33</td> </tr> <tr> <td>Shrub dominated &gt; 15 years</td> <td>33</td> </tr> <tr> <td colspan="2"><b>Vegetated Rock/Lava</b></td> </tr> <tr> <td>Perennial Grass</td> <td>6</td> </tr> <tr> <td>Rock/shrub/grass/tree mix</td> <td>80</td> </tr> <tr> <td>Cheatgrass/weeds</td> <td>&lt;14</td> </tr> </table>	Perennial grass/ shrub < 10 years	33	Shrub/perennial grass 10–20 years	33	Shrub dominated > 15 years	33	<b>Vegetated Rock/Lava</b>		Perennial Grass	6	Rock/shrub/grass/tree mix	80	Cheatgrass/weeds	<14					
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Cheatgrass/weeds	<14																		
<p>Action: Use chemical, mechanical, seeding, and prescribed fire treatments as appropriate to achieve DFC. In perennial grass, invasive annual grasses, and juniper-invaded cover types, restore the sagebrush steppe with an aggressive sagebrush seeding effort, using the appropriate sagebrush subspecies for the treatment area.</p>	N/A	Adequate		Secondary	N/A														
<p>Action: Conduct fire/non-fire vegetation treatments in non-WUI areas with the following goals:</p> <ul style="list-style-type: none"> <li>• Diversify perennial grass to speed reestablishment of sagebrush cover.</li> <li>• Enhance structural and species diversity in degraded low-elevation sagebrush steppe.</li> <li>• Reduce shrub and juniper density in mid-elevation shrub.</li> </ul>	N/A	Adequate, although we might need new limitations or restrictions on treatments in sagebrush habitat		Secondary	Invasive Species														

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat				
<ul style="list-style-type: none"> <li>Reduce invasive species or noxious weeds in all vegetation types.</li> <li>In mountain shrub, rejuvenate old, decadent shrubs and increase cover and density of desirable herbaceous species.</li> </ul>									
<p>Action: Design vegetation treatments in concert with wildlife species and their season of use (e.g., winter, lekking, transitional, nesting, hibernation) while maintaining required habitat characteristics such as but are not limited to:</p> <ul style="list-style-type: none"> <li>Providing cover for wildlife</li> <li>Maintaining diversity</li> <li>Treating in a mosaic pattern</li> <li>Providing travel corridors</li> <li>Mimicking natural historic disturbances (e.g., fingering, uneven patches).</li> </ul>	N/A	Adequate		Secondary	N/A				
<p>Action: As appropriate, to move vegetation cover types towards the DFC, use various methods (e.g., prescribed fire, mechanical, chemical, WFU) to treat on an <i>annual</i> basis the following footprint acres.</p> <table border="1" data-bbox="191 1300 730 1414"> <thead> <tr> <th>Cover Type</th> <th>Acres treated</th> </tr> </thead> <tbody> <tr> <td>Wyoming/Basin Big</td> <td>45,010–</td> </tr> </tbody> </table>	Cover Type	Acres treated	Wyoming/Basin Big	45,010–	N/A	Adequate		Secondary	N/A
Cover Type	Acres treated								
Wyoming/Basin Big	45,010–								

Current Management		Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
Sagebrush	49,750					
Mountain Big Sagebrush	8,165–9,025					
Low Sagebrush	95–105					
<b>Vegetation – Forest &amp; Woodlands</b>						
<b>GOAL:</b> [Insert goal #1]						
Objective: [Insert objective #1]						
Action: [Insert management action #1]						
<b>Vegetation – Rangeland</b>						
<b>GOAL:</b> Ensure the vegetation resources provide for the long-term health and sustainability of the plant community, and meet the needs of fish and wildlife habitat and human uses.		N/A	Adequate		Secondary	N/A
Objective: Control invasive species/noxious weeds and poisonous plants to decrease the overall number of areas occupied. Minimize the likelihood of introduced now species of invasive species/noxious weeds and prevent weeds from becoming established.		N/A	Adequate		Secondary	Invasive Species
Action: Manage livestock grazing according to Standard 4 (Vegetation) of the Idaho Standards for Rangeland Health.		N/A	Adequate		Secondary	livestock grazing

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
Action: Temporarily close areas to livestock grazing after disturbances such as wildland fire, fire vegetation treatments, and non-fire vegetation treatments until monitoring shows that resource objectives (e.g., plant cover, riparian condition, species composition) have been met.	N/A	Adequate		Secondary	livestock grazing
<b>Vegetation – Riparian</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Vegetation – Weeds</b>					
<b>GOAL:</b> Ensure the vegetation resources provide for the long-term health and sustainability of the plant community, and meet the needs of fish and wildlife habitat and human uses.	N/A	Adequate		Secondary	N/A
Objective: Control invasive species/noxious weeds and poisonous plants to decrease the overall number of areas occupied. Minimize the likelihood of introduced new species of invasive species/noxious weeds and prevent weeds from becoming established.	N/A	Adequate		Secondary	Invasive species

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
Action: Priority treatment areas include: <ul style="list-style-type: none"> <li>• Wilderness study areas/areas of critical environmental concern/research natural areas</li> <li>• Special status species (SSS) habitats</li> </ul>	N/A	Adequate		Secondary	N/A
<b>Fisheries &amp; Aquatic Wildlife</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Wildlife</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Special Status Species – Wildlife</b>					
<b>Sage-grouse</b>					
<b>GOAL:</b> Ensure public lands are managed to conserve species and their habitats, while providing for favorable conditions that support their	N/A	Adequate		Secondary	N/A



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
continued existence.					
Objective: Maintain, improve, or increase habitat for sensitive species to prevent them from becoming listed species (i.e. Federal T&E).	N/A	Adequate		Secondary	N/A
Action: Maintain existing partnerships and establish new partnerships (e.g., Greater sage-grouse working groups, IDFG, local cave groups) that help manage sensitive species habitat on BLM-administered public lands. Coordinate with state and other federal agencies to support research efforts, develop partnerships, and develop outreach and educational opportunities to inform the public about sensitive species habitats and populations.	N/A	Adequate		Tertiary	N/A
Action: Pursue conservation easements, land acquisitions, cooperative management efforts, and other programs to support conservation of sensitive species and linkage corridors to improve habitat connectivity.	N/A	Adequate		Tertiary	N/A
Action: Reduce impacts to sensitive species habitat by implementing measures such as but not limited to: <ul style="list-style-type: none"> <li>• Implement distance and timing stipulations.</li> </ul>	N/A	These are very general principles, so they'd still apply. However, the specific distances and		Secondary	Infrastructure

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<ul style="list-style-type: none"> <li>Consider placement of, rerouting, modifying, or removing infrastructure (e.g., facilities, powerlines, pipelines, fence lines) or project location.</li> <li>Consider placement of range improvements.</li> </ul>		timing limitations need updating.			
Action: Inventory potential habitat and monitor population trends.	N/A	More specificity needed		Secondary	N/A
Action: Permitted/authorized activities (mining, recreation, land use authorizations, grazing, etc.) within sensitive species habitat may be modified (e.g., closed, limited or restricted access, season of use) to reduce potential conflicts or impacts (e.g., disturbance, habitat degradation).	N/A	More specificity needed. What are those modifications/mitigative measures required?		Secondary	Human
Action: Manage livestock grazing in special status species habitat according to Standard 8 (Special Status Species) under Idaho Standards for Rangeland Health.	N/A	Working, but more conservation measures related to livestock grazing are needed.		Secondary	Livestock grazing
Objective: Maintain, improve, or increase habitat for sensitive species to preclude them from becoming listed species (i.e., federally threatened or endangered).	N/A	Adequate		Secondary	N/A
Action:	N/A	More specific		Secondary	Human

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>Manage Greater sage-grouse habitat consistent with appropriate conservation plans (e.g., Conservation Plan for the Greater Sage-grouse in Idaho [ISAC 2006]), local working group (e.g., Upper Snake, Challis, Eastern Idaho Uplands, Big Desert, and Magic Valley) and IDFG conservation strategies (e.g., Idaho Comprehensive Wildlife Conservation Strategy [IDFG 2005a]), including future revisions or amendments, and current BLM guidance, by:</p> <ul style="list-style-type: none"> <li>• Reducing/controlling invasive species/noxious weeds</li> <li>• Reducing/limiting disturbance during breeding, nesting, and early brood rearing</li> <li>• Establishing setbacks or buffers</li> <li>• Maintaining/improving habitats through proactive vegetation treatments</li> <li>• Maintaining nesting habitat</li> <li>• Applying livestock management techniques (e.g., sheep-bedding, herding, salting, water hauling, varying season of use, adjusting livestock numbers, developing alternative sources of water, and converting spring developments to a closed system).</li> </ul>		<p>conservation measures may be needed.</p>			<p>disturbance</p>
<p>Action: Limit physical, mechanical, and audible</p>	<p>Lek location data</p>	<p>Inadequate. Timing Limitation</p>		<p>Secondary</p>	<p>Human disturbance</p>

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
disturbance within 0.5 miles of active leks from March through June (Sharp-tailed Grouse)		buffer needs to be expanded and a No Surface Occupancy buffer needs to be included as well.			
<b>General Wildlife</b>					
<b>GOAL:</b> Ensure that public lands are managed to provide for wildlife species and their habitats so as to have diverse and viable populations, emphasizing an ecosystem approach.	N/A	Adequate		Secondary	N/A
<b>Objective:</b> Maintain or improve diverse wildlife habitats to support priority wildlife species (e.g. deer, elk, pronghorn, moose, owls, hawks).	N/A	Adequate		Secondary	N/A
<b>Action:</b> Apply distance and timing stipulations to reduce disturbance to wildlife during critical times of the year (i.e., breeding, nesting, wintering).	N/A	Inadequate. Need <i>specific</i> timing limitation and No Surface Occupancy buffers.		Secondary	Human disturbance
<b>Action:</b> As appropriate, modify infrastructure and range improvements through a variety of methods (e.g., wire spacing, installation of wildlife diverters or bird ladders) to reduce impacts to wildlife.	N/A	Adequate, but consider additional detailed conservation measures/BMPs related to existing infrastructure.		Secondary	infrastructure
<b>Action:</b>	N/A	Adequate		Secondary	Weather

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
Support continuation of the existing program to provide season-long water to resident wildlife. Consider the Big Desert as the priority area for artificial water development.					
Action: Where livestock water developments exist and new developments are proposed, make developments wildlife safe (e.g., wildlife escape ramps) and provide, where practicable, an accessible and continuous supply for wildlife use.	N/A	Adequate		Secondary	Livestock grazing
Action: Coordinate control of pest species (e.g., Mormon crickets, grasshoppers, coyotes, foxes) with the U.S. Department of Agriculture Wildlife Services and the Animal and Plant Health Inspection Service.	N/A	Adequate		Tertiary	Invasive species
<b>Special Status Species – Plants</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Wild Horses and Burros</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective:					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
[Insert objective #1]					
Action: [Insert management action #1]					
<b>Cultural Resources</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Paleontology</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Wildland Fire Management</b>					
<b>GOAL:</b> Ensure that public lands are managed to protect public health and firefighter safety, resources and private lands, restore fire adapted ecosystems and promote community assistance and education.	N/A	Adequate		Tertiary	wildfire
Objective: Observe National Fire Policy wildland fire	N/A	Adequate		Secondary	wildfire

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
suppression priorities, including striving to reduce average wildland fire size and number of human-caused fire starts within the wildland-urban interface.					
<p>Action: When multiple wildland fire ignitions occur, apply the following criteria for establishing suppression priorities for resource protection, after fire fighter and public safety and WUI concerns are addressed:</p> <ul style="list-style-type: none"> <li>• Minimize risks to Greater sage-grouse source, Key, and Restoration habitats.</li> <li>• Minimize risks to resources where changes in fuel accumulation and fire occurrence have occurred (e.g., fire regime condition class [FRCC] 2 and FRCC 3 areas).</li> </ul>	N/A (Assuming you have statewide coverage of Key and Restoration habitat)	Adequate		Secondary	Wildfire
<p>Objective: Plan, design, and monitor WUI and landscape-level projects to reduce the combined risk to human life/property and resources.</p>	N/A	Adequate		Tertiary	Wildfire
<p>Action: Design fuels and vegetation projects (e.g., thinning, fuel breaks, reducing juniper encroachment) at the appropriate landscape scale to prevent wildland fire from moving toward or from WUI areas or other resources at risk (e.g., Greater sage-grouse</p>	N/A	Adequate		Secondary	Wildfire

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
habitat, big game ranges, developed recreation sites) using applicable fuels and vegetation treatment methods (e.g., chemical, biological [including livestock], mechanical, seeding, prescribed fire).					
Action: In designing vegetation treatments in Low- and Mid-elevation Shrub and Mountain Shrub that could potentially affect Greater Sage-grouse, conservation measures would be implemented.	Use statewide veg coverage, or USFO can provide one upon request	Inadequate. Need to state the specific conservation measures required.		Secondary	Wildfire
Objective: Maintain, protect, and expand Greater sage-grouse stronghold/source habitats.	N/A	Adequate		Primary	Wildfire
Action: Conduct vegetation treatments in areas that pose a wildland fire risk to Greater sage-grouse Key habitat.	N/A	Adequate		Primary	Wildfire
Objective: Maintain or improve FRCC so that wildland fire occurs within the historical (natural) range of fire frequency-severity while supporting the DPC.	N/A	Adequate		Tertiary	Wildfire
Action: Strategically place treatments on a landscape scale to prevent wildland fire from spreading into intact sagebrush steppe habitat (e.g., leks, breeding or brood rearing area) or WUI.	N/A	Adequate		Primary	Wildfire



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
Objective: Rehabilitate and stabilize areas to help stabilize soils, promote natural recovery, and establish fire-tolerant vegetation communities.	N/A	Adequate		Secondary	Wildfire
Action: WFU may be allowed in historically frequent fire regimes to restore fire's natural role and in Greater sage-grouse habitat for the benefit of the habitat only after site-specific project-level coordination with the Idaho Department of Fish and Game.	N/A	Adequate		Secondary	Wildfire
Action: Suppress wildland fires in stronghold/source habitats, except where WFU would benefit habitat.	N/A	Adequate		Primary	Wildfire
<b>Goal:</b> Protect and enhance sage grouse source habitats as well as enhance key ecological components in plant and animal communities.	N/A	Adequate		Secondary	Wildfire
Objective: Make progress towards DFC in the low-elevation shrub, perennial grass, invasive annual grass, mid-elevation shrub, mountain shrub, and juniper vegetation types.	N/A	Adequate		Secondary	Wildfire
Action: In perennial grass, invasive grass, and juniper invaded cover types, restore sagebrush steppe with an aggressive sagebrush seeding	N/A	Adequate		Primary	Wildfire

<b>Current Management</b>	<b>Source Data (GIS data requirements/ source related to management action)</b>	<b>Preliminary Assessment</b>	<b>Management Adequacy Y/N (N=need amendment)</b>	<b>Sage-grouse relation</b>	<b>Threat</b>
effort, using the appropriate sagebrush subspecies for the treatment area.					
Objective: Maintain, protect, and expand sage grouse source habitats.	N/A	Adequate		Primary	Wildfire
Action: Allow WFU in sage grouse habitats for the benefit of the habitat only after site-specific project level coordination with IDFG.	N/A	Adequate		Secondary	Wildfire
Action: Treat areas with source habitats that have low resiliency (i.e., areas characterized by low species diversity, undesirable composition, and dead or decadent sagebrush)	N/A	Adequate		Secondary	Wildfire
Action: Following wildland fire, WFU and prescribed fire treatments, use chemical, mechanical, and seeding treatments with appropriate plant materials to attempt to stabilize sites and prevent dominance of invasive, annual vegetation, and noxious weeds.	N/A	Adequate		Secondary	Invasive species
Objective: Treat sage grouse key and restoration habitats to expand source habitats. Improve and maintain sage grouse Restoration (RI-3) and key habitats.	N/A (assuming you have statewide coverage of Restoration habitat)	Adequate		Primary	Wildfire
Action: Use AMR to wildland fire in all sage grouse	N/A	Adequate		Primary	Wildfire

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
restoration and key habitats and healthy wildlife habitats.					
Action: WFU may be allowed in historically frequent fire regimes to restore fire's natural role and in sage grouse restoration and key habitats for the benefit of the habitat only after site-specific project level consultation/collaboration with IDFG.	N/A	Adequate		Secondary	Wildfire
Action: Conduct vegetation treatments in restoration and key habitats to reduce risk of wildland fire and reconnect restoration and key habitats.	N/A	Adequate		Primary	Wildfire
Action: Treat areas of restoration and key habitats that have low resiliency characterized by low species diversity.	N/A	Adequate		Secondary	Wildfire
Objective: Apply Greater sage-grouse conservation measures and management restrictions for fire suppression and fire and non-fire vegetation treatments.	N/A	Adequate		Secondary	Wildfire
Action: Implement the following suppression restrictions: <b><u>Fire Management</u></b> <ul style="list-style-type: none"> <li>In the event a wildland fire escapes initial attack, a BLM resource advisor will be</li> </ul>	N/A	Adequate, together with other fire suppression actions		Secondary	wildfire

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<p>assigned to ensure that resource management concerns are adequately addressed and that necessary mitigation occurs. If one of the following is being threatened or has the potential to be threatened, the appropriate manager will be notified with the following information and a resource advisor will be dispatched: 1) Public health and safety, 2) WUI, 3) Sage grouse habitat and, 4) Any ACEC, Resource Natural Area (RNA), congressionally delegated watershed or any other area of significant concern.</p> <p><b><u>Noxious Weeds</u></b></p> <ul style="list-style-type: none"> <li>To minimize spread of noxious weeds, equipment used for extended attack or Type I/II incidents should be cleaned before arriving on-site and prior to leaving the incident. Staging areas and fire camps should avoid sites with noxious weed infestations.</li> </ul> <p><b><u>Special Designations (WSAs, ACECs)</u></b></p> <ul style="list-style-type: none"> <li>Fire camps and staging areas should be placed outside of special management areas.</li> <li>Use of natural firebreaks and existing roads and trails to contain a wildland fire would be encouraged.</li> <li>The resource values, hazards present, and management prescriptions within specific areas would be evaluated when</li> </ul>					

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<p>applying guidelines to ACECs.</p> <p><b><u>Vegetation</u></b></p> <ul style="list-style-type: none"> <li>Blading should occur on existing roads where possible. Blading through undisturbed areas, especially those supporting native cover types, should be avoided unless necessary to protect life, property, or resource values.</li> </ul> <p><b><u>Wildlife</u></b></p> <ul style="list-style-type: none"> <li>When conducting fire suppression actions, species with recovery plans, conservation agreements, Partners in Flight species, and Birds of Conservation Concern will be protected as specified in their respective plans and or agreements.</li> <li>Establishment of control lines, base camps, and support facilities in known SSS habitat will be avoided unless life and property are threatened.</li> </ul> <p><b><u>Threatened, Endangered, and Candidate Species</u></b></p> <p>The following restrictions apply to Proposed, Threatened, Endangered and Candidate species and to “designated” critical habitat.</p> <ul style="list-style-type: none"> <li>The BLM will coordinate annually with the USFWS to update species status in the planning area.</li> <li>Field Managers will ensure resource staff initiates emergency consultation with the USFWS whenever suppression activities</li> </ul>					

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<p>may impact listed species habitat and, more specifically, during emergency suppression actions to protect life and property.</p> <ul style="list-style-type: none"> <li>• Minimum Impact Suppression Techniques (MIST) guidelines will be followed in occupied T&amp;E and Candidate species habitat where appropriate (Appendix T in Interagency Standards for Fire and Aviation Operations, 2005). MIST guidelines direct suppression techniques, procedures, tools, and equipment that least impact the environment. Wet-lining (using water to soak/saturate fuels) is the preferred fireline construction tactic.</li> <li>• Field Managers will assign a Resource Advisor or other designated representative as per the current Red Book guidance. <ul style="list-style-type: none"> <li>○ BLM will notify USFWS when appropriate to discuss T&amp;E species mitigation within the suppression area to assure conservation practices are being followed to avoid adverse effects.</li> <li>○ When Incident Management Teams (IMTs) are required, the Resource Advisor will brief the IC about conservation measures needed to avoid adverse effects.</li> </ul> </li> <li>• To minimize spread of noxious weeds,</li> </ul>					

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<p>equipment used for extended attack or Type I/II incidents should be cleaned before arriving on-site and prior to leaving the incident. Staging areas and fire camps will avoid sites with noxious weed infestations.</p>					
<p>Action: Implement the following fire and non-fire vegetation restrictions: <b><u>Vegetation Management</u></b></p> <ul style="list-style-type: none"> <li>No chemical treatment would conflict with existing or future national vegetative treatment guidance. To reduce potential resource impacts from chemical treatments, herbicide use would conform to application criteria described in the 1991 document, Environmental Impact Statement for Vegetation Treatment on BLM Lands in Thirteen Western States or in subsequent revisions and/or replacements of this document. Use would conform to instructions from BLM Manual 9011 Chemical Pest Control, as well as label restrictions and current policies and state statutes. In addition, the prescription for herbicide application (desired, optimum environmental conditions) would evaluate off-site migration and non-target species by assessing wind speed and direction,</li> </ul>	N/A	Adequate, along with other veg treatment actions		Secondary	wildfire

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<p>temperature, precipitation forecast, soil infiltration potential, constraints on overland water transport due to precipitation or flooding, establishment of riparian buffer strips, and risk to special status species. Fishery and/or wildlife biologists would assist project planners in selecting appropriate herbicides for use among or near terrestrial and aquatic flora and fauna sensitive to herbicides.</p> <ul style="list-style-type: none"> <li>Fuels treatments would be utilized to reduce the overall threat of the establishment and spread of noxious/invasive plant species.</li> </ul> <p><b><u>Livestock Grazing</u></b></p> <ul style="list-style-type: none"> <li>All treatment areas would be rested from livestock grazing until project-specific monitoring identified in site-specific project plans and/or NEPA documents show that resource objectives have been met. Resumption of grazing would be determined on a case-by-case basis.</li> </ul> <p><b><u>Placeholder Species</u></b></p> <ul style="list-style-type: none"> <li>Plant materials used in re-vegetation actions would be native when appropriate and practical. However, desirable non-native species may be used in re-vegetation actions on harsh or degraded sites, when native seed is not</li> </ul>					



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<p>available, or where they would structurally mimic the natural plant community and prevent soil loss and invasion by exotic annual grasses and noxious weeds. The species used would be those that have the highest probability of establishment on these sites. These "placeholders" would maintain the area for potential future native restoration. Native seed would be used more frequently and at larger scales as species adapted to local areas become more available.</p> <p><b>Wildlife</b></p> <ul style="list-style-type: none"> <li>Species with recovery plans, conservation agreements, Partners in Flight species, and Birds of Conservation Concern will be protected as specified in their respective plans/agreements.</li> <li>Habitat Conservation Assessment and Conservation Strategies have been prepared and are currently being implemented for the following BLM sensitive species: Townsend's big-eared bat, wolverine, spotted bat, white headed woodpecker, trumpeter swan, northern goshawk, Columbian sharp-tailed grouse, greater sage grouse (Idaho plan pending), mountain quail, Idaho dunes tiger beetle, Bonneville cutthroat trout, bull trout, Yellowstone cutthroat trout, red band</li> </ul>					

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<p>trout and leather sided chub.</p> <ul style="list-style-type: none"> <li>Vegetation treatments proposed in areas supporting sage grouse and sharp-tailed grouse would be coordinated with IDFG and would be implemented under LUP guidance or restrictions.</li> </ul> <p><b><u>Threatened, Endangered, and Candidate Species</u></b></p> <p>The following restrictions apply to proposed habitats occupied by T&amp;E and Candidate species and designated critical habitat.</p> <ul style="list-style-type: none"> <li>Treatment activities may occur near or adjacent to T&amp;E and Candidate species habitat and will be designed to minimize or mitigate impacts to habitat occupied by T&amp;E and Candidate species and designated critical habitat so that the species or their habitats will not be adversely affected. All related fire and non-fire vegetation treatment activities in areas that may affect T&amp;E and Candidate species would be conducted in consultation with USFWS. Further, all such activities would be designed and implemented in such a manner that potential impacts to T&amp;E and Candidate species from disturbance or habitat modification would be extremely unlikely to occur or would be so small as to not be meaningfully measured, detected, or analyzed.</li> </ul>					

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<ul style="list-style-type: none"> <li>T&amp;E and Candidate species with recovery plans, conservation agreements, and conservation strategies will be protected as specified in their respective plans/agreements/strategies. These protections include such measures as adequate habitat and range for a given species, including mitigation measures for multiple land use activities authorized by the BLM.</li> <li>Herbicide applicators will obtain a weather forecast for the area prior to initiating a spraying project to ensure no extreme precipitation or wind events could occur during or immediately after spraying. Aerial application of herbicides will not occur during periods of inversion. Spraying will follow label instructions.</li> </ul>					
<p>Action: Implement the following Greater sage-grouse conservation measures: <b>Prescribed Fire</b></p> <ul style="list-style-type: none"> <li>Prior to planning prescribed burns or other vegetation management treatments in sagebrush communities, ensure that sage-grouse seasonal habitats have been mapped (see 5.3.2 for additional discussion of mapping).</li> <li>Once seasonal habitats have been</li> </ul>	N/A	Adequate		secondary	Prescribed Fire

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<p>mapped, ensure that proposed project areas have been evaluated on the ground in the context of the appropriate seasonal habitat characteristics (see 5.3.2).</p> <ul style="list-style-type: none"> <li>• Avoid the use of prescribed fire and other sagebrush-reduction projects in areas where sagebrush is limiting on the landscape or in habitats that currently meet, or are trending toward meeting, breeding or winter habitat characteristics.</li> <li>• If the analysis shows that a vegetation treatment may still be advisable, design habitat-manipulation projects to achieve the desired objectives, considering the following:               <ul style="list-style-type: none"> <li>○ Where prescribed burning, or other treatments, in sage-grouse habitats may be warranted (e.g., sagebrush cover exceeds desired breeding or winter habitat characteristics; understory does not meet seasonal habitat characteristics and restoration is desired; there is a need to restore ecological processes; or a proposed treatment site is in an exotic seeding being managed for overall sage-grouse benefits on the surrounding landscape).</li> <li>○ Project design should be done with</li> </ul> </li> </ul>					

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<p>interdisciplinary input and in cooperation with IDFG.</p> <ul style="list-style-type: none"> <li>○ Ensure that any proposed sagebrush treatment acreage is conservative in the context of surrounding seasonal habitats and landscape.</li> <li>○ Where appropriate, ensure that treatments are configured in a manner that promotes use by sage-grouse (see Connelly 2000 for additional discussion).</li> <li>○ Leave adequate untreated sagebrush areas for loafing/hiding cover near leks for sage-grouse.</li> </ul> <ul style="list-style-type: none"> <li>● Evaluate and monitor prescribed burns, and other treatments, as soon as possible after treatment and periodically thereafter to determine whether the project was successful and is meeting or trending toward desired objectives.</li> <li>● Avoid the use of prescribed fire or other sagebrush treatments in habitats prone to the expansion or invasion of cheatgrass or other invasive species unless adequate measures are taken to control the invasive species and ensure subsequent dominance by desirable perennial species. In many—if not most—cases, this will likely require chemical treatments and reseeded.</li> <li>● Plan, execute, and monitor prescribed</li> </ul>					

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<p>fires in a manner that provides for adequate control and provision for contingency resources.</p> <ul style="list-style-type: none"> <li>• Ensure that burn plans address the importance of preventing escaped fires when prescription fires are planned in the vicinity of stronghold and key habitat.</li> </ul> <p><b>Annual Grasslands</b></p> <ul style="list-style-type: none"> <li>• Local working groups (LWG), land management agencies, IDFG, and other partners should work closely together to identify and prioritize annual grassland areas for restoration. Work cooperatively to identify options, schedules, and funding opportunities for specific projects.</li> <li>• In general, the priority for implementation of specific sage-grouse habitat restoration projects in annual grasslands should be given first to: <ul style="list-style-type: none"> <li>○ Sites adjacent to or surrounded by sage-grouse stronghold habitats, then</li> <li>○ Sites outside stronghold habitats but adjacent to or within approximately two miles of key habitat, and</li> <li>○ Sites beyond two miles of key habitat. The intent here is to focus restoration outward from existing, intact habitat.</li> </ul> </li> <li>• All seeding project designs should include measures for noxious weed control and</li> </ul>					

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<p>monitoring for at least 3 years following implementation.</p> <ul style="list-style-type: none"> <li>Seed used in sage-grouse habitat restoration seedings, burned area rehabilitation projects, and hazardous fuels/wildland urban interface projects will be tested and certified as weed-free, based on prevailing agency policy and protocol. Private landowners are encouraged to use only certified seed, as well.</li> <li>In designing rehabilitation and restoration projects, use the best available science relative to seeding technology and plant materials. Use of NRCS's "VegSpec" website may be helpful. VegSpec is a web-based decision support system that assists land managers in the planning and design of vegetation establishment practices. VegSpec uses soil, plant, and climate data to select plant species that are site-specifically adapted, suitable for the selected practice, and appropriate for the purposes and objectives for which the planting is intended. (See <a href="http://plants.usda.gov">http://plants.usda.gov</a>).</li> <li>Design vegetation treatments in areas of high fire frequency to facilitate firefighter safety; reduce the risk of extreme fire behavior; reduce the risk and rate of fire</li> </ul>					

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<p>spread to stronghold, key, and restoration habitats; reduce fire frequencies; and shorten the fire season.</p> <ul style="list-style-type: none"> <li>• Where rangelands are dominated by annuals (such as cheatgrass) or where they border farmlands or railroad right-of-ways, convert cheatgrass areas to perennials, or establish buffers of perennial species to reduce the risk of fire spread from railroad or agriculture-related activities (e.g., sparks from trains, field burns, burn barrels), where appropriate and feasible.</li> <li>• To discourage the spread of invasive annuals and noxious weed seed, require the washing of fire vehicles (including undercarriage) prior to deployments and prior to demobilization from wildfire incidents.</li> <li>• Human activities such as fence and pipeline maintenance or construction, facility maintenance, utility maintenance, or any project or related work at or within 1 km (0.6 miles) of occupied leks that results in or will likely result in disturbance to lekking birds should be avoided from approximately 6:00 PM to 9:00 AM. In general, this guideline should be applied from March 15 through May 1 in lower elevation habitats and March 25 through May 15 in higher elevation</li> </ul>					



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<p>habitats.</p> <p><b>Perennial Grasslands</b></p> <ul style="list-style-type: none"> <li>• LWGs, land management agencies, IDFG, and other partners should work closely together to identify and prioritize perennial grasslands (exotic versus native) where plant species diversity or sagebrush is limiting on the landscape. Further, they should work cooperatively to identify options, schedules, and funding opportunities for reestablishing sagebrush in higher priority areas.</li> <li>• When seeding sagebrush, source-identified, tested seed adapted to local conditions should be used.</li> <li>• One or more of the following approaches for restoring sagebrush should be considered to improve likelihood of success (see Dalzell 2004 and Monsen et al. 2004):</li> <li>• Use of the "Oyer" compact row seeder, which compacts soil and presses seed into the surface.</li> <li>• Use of the Brillion cultipacker seeder, where seed is broadcast over the surface followed by cultipacking.</li> <li>• Transplant bare-root or containerized stock in small critical areas to establish a seed source.</li> <li>• Use the "mother plant" technique, and</li> </ul>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>transplant bare-root or containerized stock in select locations throughout the area to establish a seed source.</p> <ul style="list-style-type: none"> <li>• For large areas (e.g., large wildland fires), aerial seed onto a rough seedbed (Monsen et al. 2004) coupled with one or more of the above options.</li> <li>• In established stands of introduced perennial grasses, transplant sagebrush into strategic patches or strips in critical sites or throughout the area. Scalp spots or strips to reduce grass competition prior to planting. Or, as an alternative to scalps, consider the use of herbicides (see Monsen et al. 2004, Volume 3).</li> <li>• Where the diversification of crested wheatgrass or similar seedings with native species of grasses, forbs, and/or shrubs is desired, Pellant and Lysne (2005) recommend a three-step process:</li> <li>• Reduce competition of crested wheatgrass to facilitate the establishment and persistence of the desired species. Possibilities include use of livestock, capitalizing on drought episodes that reduce grass vigor, herbicides such as glyphosate, and mechanical treatments. <ul style="list-style-type: none"> <li>○ Introduce desired, site-adapted species through drill seeding; aerial seeding followed by harrow, cultipacker or chaining;</li> </ul> </li> </ul>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>livestock trampling; or transplanting container stock, bareroot stock, or individual plants from native sources ("wildings"). Lambert (2005) provides descriptions, recommended seeding rates, and other useful information for nearly 250 species of native and non-native grasses, forbs, and shrubs.</p> <ul style="list-style-type: none"> <li>○ As part of post-treatment management, ensure that livestock grazing and rest intervals are matched with the phenology and life history characteristics of the desired/seeded/transplanted species. Implement monitoring to clearly document how, what, when, and where treatments were implemented. Follow up with suitable effectiveness monitoring to document success of the treatments relative to project objectives.</li> </ul> <p><b>Conifer Encroachment</b></p> <ul style="list-style-type: none"> <li>• LWGs, land management agencies, IDFG, and other partners should work closely together to identify and prioritize conifer encroachment areas for further management action. Work cooperatively to identify options, schedules, and funding opportunities for specific projects. For western juniper, Miller et al. (2005) provide <i>Guidelines for Selecting the</i></li> </ul>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p><i>Most Appropriate Management Actions</i>, pages 54–57.</p> <ul style="list-style-type: none"> <li>• IDFG, land management agencies, LWGs, and other partners should work closely together to identify leks where conifer encroachment may be affecting lek attendance or nearby habitat quality.</li> <li>• Remove Douglas fir or other conifers where they are encroaching on wet meadows, riparian areas, or sagebrush stands that provide potential sage-grouse habitat.</li> <li>• Remove juniper, Douglas fir, pinyon pine, or other trees within at least 100 m (330 ft) or an 8-acre area of occupied sage-grouse leks. The purpose of this procedure is to reduce perching opportunity for raptors or other avian predators within view of leks. Techniques could include chainsaw, chipper, or other suitable mechanical means. Ensure cutting and slash disposal is completed between approximately July 15 and January 30 to minimize disturbance to grouse that may be in the vicinity (e.g., males at leks, nesting females, and young broods). This practice serves to reduce raptor predation on sage-grouse by eliminating potential perches, thereby improving survival, recruitment, and productivity. It may be particularly valuable where avian</li> </ul>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>predation may be of greater concern such as in areas with fragmented habitat, nearby infrastructure features, and/or in the case of small, isolated sage-grouse populations.</p> <ul style="list-style-type: none"> <li>Where juniper or other conifer species have encroached upon sagebrush communities at larger scales, employ prescribed fire, chemical, mechanical (e.g., chaining, chipper, chainsaw, or commercial sale), or other suitable methods to reduce or eliminate juniper. Priority should be given to areas where there is a strong likelihood for recovery of perennial herbaceous vegetation or where preparatory and follow-up actions (e.g., control of invasive species and seeding) are likely to be successful. Whenever possible, but especially if sagebrush habitat is limited locally, use juniper-control techniques that are least disruptive to the affected stand of sagebrush. For example, if junipers are only scattered, and the associated sagebrush community is otherwise relatively healthy, cutting junipers with chainsaws will remove the encroachment threat while allowing for immediate use of the sagebrush by sage-grouse. In all cases, control efforts should be planned using interdisciplinary expertise.</li> </ul>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<ul style="list-style-type: none"> <li>Where juniper control around leks is planned, monitor leks for at least three consecutive years post-treatment to document effects on lek attendance. Ideally, two to three years of pre-treatment monitoring is also recommended, but this may not always be feasible.</li> </ul>					
<b>Wilderness Characteristics Outside Existing WSAs</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Cave and Karst Resources</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Visual Resources</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective:					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
[Insert objective #1]					
Action: [Insert management action #1]					
<b>Resource Uses</b>					
<b>Forestry</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Livestock Grazing</b>					
<b>GOAL:</b> Ensure that public lands are managed to provide forage for livestock grazing consistent with other resources and resource uses as part of an ecologically healthy system.	N/A	Adequate		Secondary	Livestock grazing
Objective: Identify ≈1,807,330 acres available for livestock grazing and ≈1,950 acres unavailable for livestock grazing across the field office area (FOA) and ≈291,130 acres available within the Idaho National Laboratory boundary.	N/A, unless you want our allotment boundaries	Adequate		Secondary	Livestock grazing
Action: Manage livestock grazing according to the	N/A	Adequate		Secondary	Livestock grazing

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>Idaho Standards for Rangeland Health and Guidelines for Grazing Management. Where Idaho Standards for Rangeland Health are not being met or progress is not being made as a result of current grazing management, make changes in existing management to ensure that the allotment is meeting standards or making progress towards meeting standards. Actions may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Changing season of use</li> <li>• Reducing AUMs</li> <li>• Changing number of livestock</li> <li>• Changing class of livestock.</li> </ul>					
<p>Action: Make unavailable to livestock grazing the North Menan Butte Area of Critical Environmental Concern (ACEC)—≈1,120 acres.</p>	<p>We can get you the North Menan Butte polygon upon request.</p>	<p>Adequate</p>		<p>tertiary</p>	<p>Livestock grazing</p>
<p>Objective: Maintain an annual permitted use of ≈181,000 AUMs across the FOA and ≈14,500 AUMs within the INL boundary while maintaining a sustainable ecological balance and multiple uses.</p>	<p>N/A</p>	<p>Adequate</p>		<p>tertiary</p>	<p>Livestock grazing</p>
<p>Action: Manage livestock grazing consistent with the Conservation Plan for the Greater Sage-grouse in Idaho (ISAC 2006) and local</p>	<p>N/A</p>	<p>Adequate, but we could update with the latest conservation</p>		<p>Secondary</p>	<p>Livestock grazing</p>



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>working group plans (e.g., Big Desert Plan), implementing conservation measures such as, but not limited to:</p> <ul style="list-style-type: none"> <li>• Implementing grazing management systems (e.g., herding, rest rotation, deferred rotation) to ensure adequate nesting habitat within the breeding landscape</li> <li>• Adjusting grazing use distribution to benefit occupied Greater sage-grouse breeding habitat, through herding, salting, and water source management (e.g., turning troughs/pipelines on/off, extending pipelines/moving troughs)</li> <li>• Identifying and/or developing strategically located forage reserves</li> <li>• Moving sheep bedding grounds away from Greater sage-grouse leks</li> <li>• Placing salt/mineral supplements in existing disturbed sites, areas with reduced sagebrush cover, seedings, or cheatgrass sites</li> <li>• Considering the impact of range improvement placement on Greater sage-grouse</li> <li>• Modifying fences when impacts to Greater sage-grouse are identified.</li> </ul>		measures.			
<b>Recreation and Visitor Services</b>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<b>GOAL:</b> Ensure that public lands are managed to provide for a variety of recreational opportunities and experiences for current and future generations.	N/A	Adequate		Tertiary	Human disturbance
Objective: Improve and maintain lands for recreation opportunities.	N/A	Adequate		Tertiary	Human disturbance
Action: Seasonally close dispersed camping if impacts or environmental conditions are identified that are not commensurate with resources objectives (e.g. riparian, Special Status Species, and wildlife habitat). Restrict vehicle use associated with dispersed camping activities to designated routes.	N/A	More recreation-related conservation measures should be considered in the range of alternatives.		Tertiary	Human disturbance
<b>Comprehensive Trails and Travel Management</b>					
<b>GOAL:</b> Ensure that public lands are managed to provide a comprehensive approach to travel planning and management.	N/A	Adequate		Tertiary	Human disturbance
Objective: Provide appropriate public and administrative access to BLM-managed public lands.	N/A	Adequate		Tertiary	Human disturbance
Action: Reduce or mitigate harassment of wildlife or degradation of wildlife habitats by such actions as, but not limited to, seasonal	N/A	Adequate		Secondary	Human disturbance

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
closures, route location, and designated routes.					
Action: Follow travel guidelines, as appropriate, for the protection of wildlife habitat and other resource values.	N/A	More conservation measures should be considered.		Tertiary	Human disturbance
Action: In coordination with IDFG, establish travel restrictions (i.e., motorized, mechanized, non-mechanized, and human entry closure) on season, location, or mode of travel where a need is identified for the protection of wildlife habitat and other resource values.	N/A	Adequate		Secondary	Human disturbance
<b>Lands and Realty</b>					
<b>GOAL:</b> Ensure public lands are managed to provide land tenure adjustments, land classifications, withdrawals, easement acquisitions, and land use authorizations (LUAs) consistent with other resources and resource uses.	N/A	Adequate		Tertiary	N/A
Objective: Implement land tenure adjustments through sale or exchange.	N/A	Adequate		Tertiary	N/A
Action: Ensure that land ownership adjustments meet the following criteria: <ul style="list-style-type: none"> <li>• Public resource values, including but not limited to: threatened and endangered</li> </ul>	N/A	Adequate		Tertiary	N/A

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
and sensitive species habitat, riparian areas, fisheries, nesting/breeding habitat for game animals, key big game seasonal habitat, developed recreation and recreation access sites, class A scenery, municipal watersheds, energy and mineral potential, sites eligible for inclusion on the National Register of Historic Places, wilderness and areas being studied for wilderness, and other statutorily authorized designations					
Objective: Balance development of public land, such as rights-of-way (ROWs), utility corridors, and other LUAs, with the protection of natural resources, public enjoyment, and recreation, consistent with natural resource values and uses.	N/A	Adequate		Tertiary	infrastructure
Action: Holders of LUAs would be required to apply appropriate management techniques, practices, or guidelines to protect vegetation, wildlife habitat, and minimize soil disturbance	N/A	Specific conservation measures for existing LUAs in priority habitat may be required.		Secondary	infrastructure
Action: Accept applications for LUAs in areas not identified as avoidance or exclusion areas, ≈1,556,060 acres.  Do not allow LUAs as follows (≈187,340	ROW Exclusion and Avoidance areas	Conservation measures for new LUAs in priority habitat are needed.		Tertiary	infrastructure

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
acres): <ul style="list-style-type: none"> <li>• Wind energy site testing, monitoring, and development in National Landscape Conservation System (NLCS)–designated areas (e.g., Wilderness Areas, WSAs, National Conservation Areas, Wild and Scenic Rivers, and National and Scenic Trails)</li> <li>• WSAs (except for existing LUAs that are to be modified and that meet the non-impairment standard)</li> <li>• New roads or major ROWs within the Nine Mile Knoll ACEC</li> </ul>					
<b>Coal</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</b>					
<b>GOAL:</b> Ensure that public lands and reserved federal mineral estate are managed to provide for leasing of oil, gas, and geothermal resources while applying protective measures for other resources and resource uses.	N/A	Adequate		Secondary	Oil and gas

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>Objective: Manage ≈1,824,355 acres of federal mineral estate as open to fluid mineral leasing (oil and gas and geothermal) with lease stipulations that protect other resources and resource uses.</p>	N/A	Adequate		Tertiary	Oil and gas
<p>Action: Identify the following lands as open to leasing, subject to seasonal and controlled surface use restrictions (≈560,560 acres). These restrictions would be changed only by waiver, exception, or modification as outlined by the criteria listed in <b>Appendix Process for Fluid Mineral Leasing</b>. Seasonal wildlife guidelines (≈456,560 acres):</p> <ul style="list-style-type: none"> <li>• Greater sage-grouse strutting and nesting areas—activity allowed 6/16 to 1/30 (lands in the Big Lost MFP [BLM 1983])</li> <li>• Sharp-tailed grouse and Greater sage-grouse strutting grounds—activity allowed 5/1 to 3/1 (lands in the Medicine Lodge RMP)</li> <li>• Sharp-tailed grouse and Greater sage-grouse nesting and brood rearing areas—activity allowed 7/1 to 5/1 (lands in the Medicine Lodge RMP)</li> <li>• Sharp-tailed grouse and Greater sage-grouse winter range—activity allowed</li> </ul>	Current fluid mineral leasing categories/seasonal habitats	Inadequate. Fluid mineral stips need to be added or increased in sage-grouse habitat.		Primary	Oil and gas

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>4/1 to 12/1 (lands in the Medicine Lodge RMP)</p> <ul style="list-style-type: none"> <li>• Sharp-tailed and Greater sage-grouse nesting and brood rearing areas within the Tex Creek Wildlife Management Area—activity allowed 7/1 to 3/31</li> </ul>					
<p>Action: Identify the following lands as closed (administratively unavailable) for:</p> <ul style="list-style-type: none"> <li>• WSAs (≈183,490 acres): <ul style="list-style-type: none"> <li>○ Appendicitis Hill (≈21,900 acres)</li> <li>○ White Knob Mountain (≈9,950 acres)</li> <li>○ Hawley Mountain (≈15,510 acres)</li> <li>○ Black Canyon (≈5,400 acres)</li> <li>○ China Cup Butte (≈160 acres)</li> <li>○ Cedar Butte (≈35,700 acres)</li> <li>○ Hell’s Half Acre (≈68,760 acres)</li> <li>○ Sand Mountain (≈21,740 acres)</li> <li>○ Burnt Creek (≈3,250 acres).</li> </ul> </li> <li>• Lands within Sand Creek Wildlife Management Area Headquarters (≈120 acres)</li> </ul>	<p>Polygons unavailable</p>	<p>Consider closing all or portions of priority habitat to oil and gas leasing</p>		<p>Tertiary</p>	<p>Oil and gas</p>

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<ul style="list-style-type: none"> <li>Forest Service Administration sites and Dubois Sheep Experimental Station (≈80 acres)</li> <li>Mud (North) Lake Wildlife Management Area (≈2,705 acres)</li> </ul> <p>541,310 acres of public land withdrawn as part of the Idaho National Laboratory are closed to leasing.</p>					
<p>Action: Make available for geophysical exploration by helicopter-portable drilling methods the areas open for leasing, subject to the same no surface occupancy and seasonal occupancy restrictions</p>	N/A	Consider closing all or portions of priority habitat to oil and gas leasing		Tertiary	Oil and gas
<b>Locatable Minerals</b>					
<p><b>GOAL:</b> Ensure that public lands are reserved federal mineral estate remain open to the location of mining claims that can be developed while providing protective measures for</p>	N/A	Adequate		Tertiary	Mining
<p>Objective: Manage ≈2,006,010 acres of federal mineral estate as open to location of mining claims.</p>	N/A	Consider withdrawing all or portions of priority habitat to locatables.		Tertiary	Mining
<p>Action: Manage the following lands as withdrawn</p>	Withdrawn polygons	Consider withdrawing all or		Tertiary	Mining



Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>from entry under the mining laws:</p> <ul style="list-style-type: none"> <li>• China Cup Butte (160 acres)</li> <li>• Lands within the Sand Creek Wildlife Management Area Headquarters (120 acres)</li> <li>• Mud (North) Lake Wildlife Management Area (2,705 acres)</li> </ul> <p>In addition, manage the Idaho National Laboratory as withdrawn from entry under the mining laws (541,310 acres; these acres are not included in the total BLM acreage within the planning area)</p>		portions of priority habitat to locatables.			
<p>Action: Pursue a withdrawal under the mining laws of 1,120 acres in the North Menan Butte Area of Critical Environmental Concern ([ACEC] including the research natural area [RNA]).</p>	North Menan Butte ACEC	Consider withdrawing all or portions of priority habitat to locatables.		Tertiary	Mining
<p>Action: Identify lands in the following WSAs as open to mining claim location but subject to the non-impairment standard:</p> <ul style="list-style-type: none"> <li>• Appendicitis Hill (≈21,900 acres)</li> <li>• Black Canyon (≈5,400 acres)</li> <li>• Burnt Creek (≈3,250 acres)</li> <li>• Cedar Butte</li> </ul>	WSAs	Adequate		Tertiary	mining

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
(≈35,700 acres) <ul style="list-style-type: none"> <li>• Hawley Mountain (≈15,510 acres)</li> <li>• Hell’s Half Acre (≈68,760 acres)</li> <li>• Sand Mountain, including the St. Anthony Sand Dunes RNA (≈21,740 acres)</li> <li>• White Knob Mountain (≈9,950 acres).</li> </ul>					
Action: Incorporate conditions of approval into <b>43 CFR 3809</b> Notices and Plans of Operations to provide protection for the following resources when operations are proposed on unpatented mining claims: <ul style="list-style-type: none"> <li>• Special status species habitat</li> <li>• Big Southern Butte</li> <li>• Box Canyon of the Big Lost River</li> <li>• Quaking Aspen Butte</li> <li>• North Menan Butte ACEC (≈780 acres)</li> <li>• North Menan Butte RNA (≈340 acres)</li> <li>• The portion of Nine Mile Knoll ACEC outside of Sand Mountain WSA (≈20,710 acres)</li> <li>• Donkey Hills ACEC (≈4,040 acres).</li> </ul>	Polygons referenced in Action	New conservation measures needed for sage-grouse habitat		Tertiary	Mining
<b>Mineral Materials</b>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p><b>GOAL:</b> Ensure that public lands and reserved federal mineral estate be made available to provide for mineral materials that will meet current and future market demands while providing protective measures for other resources and resource uses.</p>	N/A	Adequate		Tertiary	Mining
<p><b>Objective:</b> Manage ≈1,771,755 acres of federal mineral estate as open to mineral material disposal, subject to permit and contract conditions of approval that would protect other resources and resource uses.</p>	N/A	Needs to be reassessed considering closing priority habitat		Tertiary	Mining
<p><b>Action:</b> Close to mineral material disposal the following wilderness study areas (WSAs) and areas of critical environmental concern (ACECs, including research natural areas [RNAs]):</p> <ul style="list-style-type: none"> <li>• Appendicitis Hill WSA (≈21,900 acres)</li> <li>• Black Canyon WSA (≈5,400 acres)</li> <li>• Burnt Creek WSA (≈3,250 acres)</li> <li>• Cedar Butte WSA (≈35,700 acres)</li> <li>• Donkey Hills ACEC (≈4,040 acres)</li> <li>• Hawley Mountain WSA (≈15,510 acres)</li> <li>• Hell's Half Acre WSA (≈68,760 acres)</li> <li>• Nine Mile Knoll ACEC (≈40,650 acres)—</li> </ul>	WSAs/ACECs	Consider closing priority habitat to mineral materials		Tertiary	Mining

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<p>includes the Sand Mountain WSA [≈21,740 acres]<sup>a</sup></p> <ul style="list-style-type: none"> <li>• St. Anthony Sand Dunes RNA (≈1,820 acres)</li> <li>• North Menan Butte ACEC (≈780 acres)</li> <li>• North Menan Butte RNA (≈340 acres)</li> <li>• White Knob Mountains WSA (≈9,950 acres)</li> </ul>					
<p>Action: Make administratively unavailable for mineral material disposal the following lands:</p> <ul style="list-style-type: none"> <li>• Big Southern Butte (4,000 acres)</li> <li>• Quaking Aspen Butte (≈2,080 acres)</li> <li>• Box Canyon on the Big Lost River (≈400 acres)</li> <li>• China Cup Butte WSA and RNA (≈160 acres)</li> <li>• Lands within Sand Creek Wildlife Management Area Headquarters (≈120 acres)</li> <li>• Mud (North) Lake Wildlife Management Area (≈2,705 acres)</li> </ul>	Polygons referenced in Action	Consider closing priority habitat to mineral materials		Tertiary	Mining
<p>Action: Develop conditions of approval that require operators to comply with mineral material regulations to protect the following surface</p>	N/A	Additional conservation measures for mineral materials		Primary	Mining

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
resource values: <ul style="list-style-type: none"> <li>• Sharp-tailed grouse and Greater sage-grouse strutting, nesting, and brood rearing areas</li> <li>• Sharp-tailed grouse and Greater sage-grouse winter range</li> <li>• Special status species habitats.</li> </ul>		needed.			
<b>Non-energy Leasables</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Renewable Energy</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Special Designations</b>					
<b>ACECs (Administrative Designations)</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective:					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
[Insert objective #1]					
Action: [Insert management action #1]					
<b>Wilderness and Wilderness Study Areas (Administrative Designations)</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Wild and Scenic Rivers</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Other Administrative Designations</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Support</b>					

Current Management	Source Data (GIS data requirements/ source related to management action)	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)	Sage-grouse relation	Threat
<b>Interpretation &amp; Environmental Education</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Transportation Facilities</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Health &amp; Safety</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					

Preliminary: GSG Conservation Guidance/MT-DAKs Conformance Review

**Instructions:** please review the NTT column and identify for your RMP how you approached that issue/topic area in your current pre-draft RMP (how this is covered in the range of alternatives, where it is found in the document, how it is analyzed, etc.) – and in the last column comments about rationale (perhaps why it wasn’t identified as an issue to be addressed) or other comments. For issues that you feel are not RMP planning level considerations (mitigation guidelines or BMPs) please discuss if these are addressed in an appendix, where they could be appropriately added, and rationale for why they are not RMP level actions for your planning area.

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
<p><b>Travel and Transportation</b></p>	<p><b>Priority Habitat</b></p> <ul style="list-style-type: none"> <li>Limit motorized travel to designated roads, primitive roads, and trails at a minimum</li> </ul>	<p><b>Appendix X pg. 214</b>  <b>DFO ROD/RMP pg. 60</b>  <u>Wheeled Motorized Use/Non-Motorized Use</u>                      Manage no areas as “open” under the regulations at 43 CFR Part 8340-8342.                      Manage 826,876 acres as “limited” to designated routes for OHV use under the regulations at 43 CFR Part 8340-8342.</p> <ul style="list-style-type: none"> <li>Designate approximately 1,342 miles of road on BLM lands as open to public travel as shown on Maps 26 and 27 (oversized).</li> <li>Make 159 miles of the 1, 342 miles of road subject to seasonal restrictions</li> </ul>	<p>No Concern</p> <p>All motorized travel in DFO is limited to designated routes.</p> <p>All of these actions listed under travel require an EA to be completed if we make any changes to the TMP.</p>
	<ul style="list-style-type: none"> <li>Travel management should evaluate the need for permanent or seasonal road or area closures.</li> </ul>	<p><b>See above↑</b>  <b>Also Appendix X pg. 214</b>  <b>Roads and Motorized Vehicles</b>  <i>Issue: Roads may increase sage grouse mortality through collisions with vehicles, displacement because of human disturbance, or other factors.</i></p> <ol style="list-style-type: none"> <li>Identify, map, quantify, and evaluate impacts of existing roads, including 2-tracks, in relation to known lek locations and sage grouse winter ranges.</li> <li>Consider impacts to sage grouse when designing new roads and modifying existing roads.</li> </ol>	<p>No Concern</p>



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		<p>3. Consider seasonal use restrictions or signing to avoid disturbance of critical times, such as winter and nesting periods.</p>	
	<ul style="list-style-type: none"> <li>Complete activity level plans within five years of the record of decision. During activity level planning, where appropriate, designate routes with current administrative/agency purpose or need to administrative access only.</li> </ul>	<p><b>Pg 62 Action 11b</b>                      11 Allow motorized cross-country or route travel to occur without prior permission in areas closed to motorized travel for the following activities:                      b. BLM personnel, or agency contractors, performing official administrative business (e.g., prescribed fire, noxious weed control, re-vegetation, surveying, etc.). Where possible, personnel will place a sign or notice in the area they are working in to identify for the public the function they are authorized to perform.</p>	<p>No Concern</p>
	<ul style="list-style-type: none"> <li>Limit route construction to realignments of existing designated routes if that realignment has a minimal impact on sage-grouse habitat, eliminates the need to construct a new road, or is necessary for motorist safety</li> </ul>	<p><b>Pg. 61 Action 9</b>                      9. Evaluate "new roads" on a case-by-case basis through an environmental assessment process to determine whether they will be open to public travel. "New roads" means roads that do not presently exist but are necessary for access to timber sales, mining activities, to provide general access, or to facilitate other authorized uses of public lands. Designate routes determined to enhance public access opportunities that do not conflict with management of other resources as open and add them to the travel management map through routine plan maintenance.</p>	<p>No Concern                       Would require an EA anyway</p>
	<ul style="list-style-type: none"> <li>Use existing roads, or realignments as described above to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary, and add the surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3 % for that area, then make</li> </ul>	<p><b>Pg. 59 Action 1</b>  <b>TRANSPORTATION AND FACILITIES MAINTENANCE</b>  <b>Goal 1</b>                      Manage facilities, including roads and trails, to provide for public access or administrative needs, while maintaining or protecting resource values and in</p>	<p>No Concern</p>

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	<p>additional, effective mitigation necessary to offset the resulting loss of sage-grouse habitat (see Objectives).</p>	<p>coordination with other federal agencies, state and local governments, and private landowners.</p> <p><b>Actions</b></p> <p>1 Inventory and maintain transportation system roads and trails under BLM jurisdiction in accordance with assigned maintenance levels as outlined in Appendix O to meet public health and safety requirements, but also in consideration of resource issues including but not limited to proliferation of weeds and disturbance of cultural resources.</p> <p><b>Appendix O pg. 171</b></p> <p>Transportation system roads and trails are classified by maintenance levels specified in BLM Manual Handbook H-9113- 2. Any changes or updates to maintenance levels will be incorporated into this planning guidance.</p>	<p>Appendix O Identifies the minimum maintenance standards to be applied</p>
	<ul style="list-style-type: none"> <li>Allow no upgrading of existing routes that would change route category (road, primitive road, or trail) or capacity unless the upgrading would have minimal impact on sage-grouse habitat, is necessary for motorist safety, or eliminates the need to construct a new road.</li> </ul>	<p>See above ↑ and Appendix O</p>	<p>No Concern</p>
	<ul style="list-style-type: none"> <li>Conduct restoration of roads, primitive roads and trails not designated in travel management plans. This also includes primitive route/roads that were not designated in Wilderness Study Areas and within lands with wilderness characteristics that have been selected for protection.</li> </ul>	<p><i>Issue: Roads and their associated disturbances and cumulative effects contribute to the loss of habitat and declining sage grouse populations.</i></p> <ol style="list-style-type: none"> <li>Develop a transportation management plan across ownership boundaries in critical sage grouse habitats.</li> <li>Participate in travel planning efforts and educate the general public about the impacts of roads on sage grouse and critical habitat.</li> <li>Consider buffers, removal, realignment, or seasonal closures where appropriate to avoid degradation of habitat.</li> <li>Re-vegetate closed roads with plant species beneficial to sage grouse.</li> </ol>	<p>Ongoing as identified in our watershed assessments</p>

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	<ul style="list-style-type: none"> <li>When reseeding roads, primitive roads and trails, use appropriate seed mixes and consider the use of transplanted sagebrush.</li> <li>Limit motorized travel to designated roads, primitive roads, and trails at a minimum.</li> </ul>	<p>5. Close and re-vegetate travel ways in sage grouse habitats where appropriate.</p> <p>6. Provide sage grouse habitat information during the planning phases of transportation development, working with MDOT, FHWA, industry, counties, etc.</p> <p>See above ↑ from Appendix X - vegetation</p> <p>Same as #1 above</p>	<p>No Concern</p> <p>No Concern</p>
<b>Recreation</b>	<p>Priority Habitat</p> <ul style="list-style-type: none"> <li>Only allow SRPs that have neutral or beneficial affects to priority habitat areas.</li> </ul>	<p>Appendix X pp. 214 Recreational Disturbance of Sage Grouse</p> <p><i>Issue: Management of lek viewing may be necessary.</i></p> <p>Action 5. Issue special use permits for certain activities with distance and timing restrictions to maintain the integrity of breeding habitat.</p>	<p>No Concern, SRP in sage grouse habitat are not specifically addressed in RMP, however most if not all our SRP are outfitter /guides for fishing or big game hunting, not likely to impact sage grouse.</p>

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<p><b>Lands/Realty</b></p>	<p><i>Rights of Way</i></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Make priority sage-grouse habitat areas exclusion areas for new ROWs permits. Consider the following exceptions:                             <ul style="list-style-type: none"> <li>○ Within designated ROW corridors encumbered by existing ROW authorizations: new ROWs may be co-located only if the entire footprint of the proposed project (including construction and staging), can be completed within the existing disturbance associated with the authorized ROWs.</li> <li>○ Subject to valid, existing rights: where new ROWs associated with valid existing rights are required, co-locate new ROWs within existing ROWs or where it best minimizes sage-grouse impacts. Use existing roads, or realignments as described above, to access valid existing rights that are not yet developed. If valid existing rights cannot be accessed via existing roads, then build any new road constructed to the absolute minimum standard necessary, and add the surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3% for that area, then make additional effective mitigation necessary to offset the resulting loss of sage-grouse.</li> </ul> </li> </ul>	<p><b>Pg. 64 Action 3 and 7</b></p> <p><b>Pg. 56 Draft RMP/EIS April 2005</b>                      New right-of-way facilities would be located within or adjacent to existing rights-of-way, to the extent practical, in order to minimize adverse environmental impacts and the proliferation of separate rights-of-way. In particular, new communication site users would be grouped into suitable existing sites to reduce impacts and expedite application processing. Site plans would be completed prior to authorizing communication site uses in new areas. The use of alternative energy sources would be considered where electric power is not available. <b>Map 19</b> shows currently authorized communication sites.</p> <p>When feasible, electric distribution lines would be required to be buried on public lands when located within one-quarter mile each side of the Madison River in order to preserve scenic quality.</p>	<p>Not sure about making them <u>exclusion</u> areas. Impacts to multiple other species could be larger if you try avoiding priority sg habitat.</p> <p>Impacts would be mitigated through design features during NEPA - EA process.</p>
	<ul style="list-style-type: none"> <li>• Evaluate and take advantage of opportunities to remove, bury, or modify existing power lines within priority sage-grouse habitat areas. Sage-grouse may avoid powerlines because of increased predation risk (Steenhof et al. 1993, Lammers and Collopy 2007). Powerlines effectively influence (direct physical area plus estimated area of effect due to predator movements) at least 39% of the sage-grouse range (Knick et al. 2011). Deaths resulting from collisions with powerlines were an important source of mortality for sage-grouse in southeastern Idaho (Beck et al. 2006, 75 FR 13910)</li> </ul>	<p><b>See appendix X pg. 213</b>  <b>Powerlines and Generation Facilities</b>  <i>Issue: Existing power lines near a lek, brood-rearing habitat, or winter habitat increases the risk of predation on sage grouse by raptors.</i></p> <ol style="list-style-type: none"> <li>1. Document the segment(s) of line causing problems.</li> <li>2. Determine by cooperative action-agencies, utilities, and landowners-whether or not modification of poles to limit perching will prevent electrocution of raptors and decrease</li> </ol>	<p>Are we to actively pursue this or just when ROW is renewed?</p>

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		<p>predation on sage grouse.</p> <ol style="list-style-type: none"> <li>3. Emphasize the following if perch prevention modifications do not work to protect sage grouse and sage-brush habitat:                             <ol style="list-style-type: none"> <li>a) reroute the line using distance, topography, or vegetative cover; or</li> <li>b) bury the line.</li> </ol> </li> <li>4. Explore opportunities for technical assistance and funding.</li> <li>5. Remove power line when use is completed.</li> </ol> <p><i>Issue: Existing power line is causing consistent or significant collision mortality on sage grouse.</i></p> <ol style="list-style-type: none"> <li>1. Document the segment(s) of line causing consistent or biologically significant mortality- with agencies, utilities, and landowners cooperating in the effort.</li> <li>2. Initiate collision prevention measures using guidelines (Avian Power Line Action Committee 1994) on identified segments. Measures are subject to restriction or modification for wind and ice loading or other engineering concerns, or updated collision prevention information.</li> <li>3. Remove power lines that traverse important sage grouse habitats when facilities being serviced are no longer in use or when projects are completed.</li> </ol>	
	<ul style="list-style-type: none"> <li>• Where existing leases or ROWs have had some level of development (road, fence, well, etc.) and are no longer in use, reclaim the site by removing these features and restoring the habitat.</li> </ul>	<p>See #5 above↑</p> <p>Habitat restoration is addressed below under Range management and Habitat Restoration</p>	<p>No Concern This is a common practice</p>
	<p><i>Planning Direction Note:</i> While engaged in this sage-grouse EIS planning process, relocate existing designated ROW corridors crossing priority sage-grouse habitat void of any authorized ROWs, outside of the priority habitat area. If relocation is not possible, undesignate that entire corridor during the planning process.</p>		

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	<p><u>General sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Make general sage-grouse habitat areas “avoidance areas” for new ROWs.</li> </ul>	<p><b>Pg. 64 Action 7</b>                      7. Where avoidance areas and designated corridors over-lap (e.g., the Lewis and Clark Trail and the designated corridor through the Beaverhead River Canyon), issuance of new rights-of-way and upgrade/expansion of existing rights-of-way will be allowed if mitigation measures can reduce impacts to resources of concern to an appropriate level.</p>	<p>No Concern                      This is a common practice</p>
	<ul style="list-style-type: none"> <li>• Where new ROWs are necessary, co-locate new ROWs within existing ROWs where possible.</li> </ul>	<p><b>Pg. 64 Action 3</b>                      3. Locate new right-of-way facilities within or adjacent to existing rights-of-way, to the extent practical, in order to minimize adverse environmental impacts and the proliferation of separate rights-of-</p>	<p>No Concern                      This is a common practice</p>
	<p><b><i>Land Tenure Adjustment</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Retain public ownership of priority sage-grouse habitat. Consider exceptions where:                             <ul style="list-style-type: none"> <li>○ There is mixed ownership, and land exchanges would allow for additional or more contiguous federal ownership patterns within the priority sage-grouse habitat area.</li> <li>○ Under priority sage-grouse habitat areas with minority federal ownership, include an additional, effective mitigation agreement for any disposal of federal land. As a final preservation measure consideration should be given to pursuing a permanent conservation easement.</li> </ul> </li> </ul>	<p><b>Land Ownership Adjustment Pg. 38</b>                      In considering whether an exchange is in the public interest, consideration is given to the opportunity to:                     <ul style="list-style-type: none"> <li>• achieve better management of Federal lands,</li> <li>• meet the needs of state and local residents and their economies,</li> <li>• secure important objectives, including but not limited to, protection of fish and wildlife habitats, cultural re-sources, watersheds, wilderness and aesthetic values; enhancement of recreation opportunities and public access; consolidation of lands and/or interests in lands; consolidation of split estate; expansion of communities; accommodation of land use authorizations; pro-motion of multiple-use values; and fulfillment of public needs.</li> </ul> <p><b>Goal 2 pg. 39</b>                      Retain public lands with high resource values in public ownership. Adjust land ownership to consolidate public land holdings, acquire lands with high public resource values, and meet public and community needs.</p> </p>	<p>No Concern                      Lands for disposal are identified in Appendix I</p>
	<ul style="list-style-type: none"> <li>• Where suitable conservation actions cannot be achieved, seek to acquire state and private lands with intact</li> </ul>	<p><b>Acquisition Criteria - Appendix H pg.129</b>                      Lands would be considered for acquisition</p>	<p>We may seek but we may not be able to afford!</p>

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	<p>subsurface mineral estate by donation, purchase or exchange in order to best conserve, enhance or restore sage-grouse habitat.</p>	<p>if one of more of the following criteria is met and acquisition would:</p> <ul style="list-style-type: none"> <li>• Facilitate access to public lands and resources</li> <li>• Maintain or enhance the manageability of public lands and resources</li> <li>• Maintain or enhance important public values and uses, especially                             <ul style="list-style-type: none"> <li>o Special Status Species plant, animal and fish habitats</li> </ul> </li> </ul>	<p>If there is not a NLLS nexus then there is no funding. Therefore our abilities to do land exchanges are very limited due to the many requirements and lack of funding.</p>
	<p><b><i>Proposed Land Withdrawals</i></b>  <u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Propose lands within priority sage-grouse habitat areas for mineral withdrawal.</li> </ul>	<p><b>Withdrawals Pg 41</b>  <b>Actions 1,2,3,5</b></p> <ol style="list-style-type: none"> <li>1. Review existing withdrawals on a case-by-case basis prior to the end of the withdrawal period or as other-wise required by law to determine whether the withdrawals should be extended, revoked, or modified. Withdrawals no longer needed, in whole or in part, for the purpose for which they were withdrawn will be revoked or modified. Appendix J describes the existing withdrawals in the planning area as shown on Map 16 (oversized).</li> <li>2. Consider other agency requests for withdrawal relinquishments, extensions or modifications on a case-by- case basis.</li> <li>3. Consider new withdrawal proposals on a case-by-case basis where the public land would transfer from one federal agency to another or where resource values or agency investments are best protected by withdrawal. Lands proposed to be withdrawn should be the mini-mum area required for the intended use and where applicable alternative prescriptions such as the use of rights-of-way, leases, permits, or cooperative agreements are inadequate to protect the resource values.</li> <li>5. Review any additional existing land classifications on a case-by-case basis to determine if they should be continued or terminated.</li> </ol>	<p>Priority habitat proposed for withdrawal not analyzed under any alternatives.</p>

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	<ul style="list-style-type: none"> <li>Do not approve withdrawal proposals not associated with mineral activity unless the land management is consistent with sage-grouse conservation measures. (For example; in a proposed withdrawal for a military training range buffer area, manage the buffer area with sage-grouse conservation measures.)</li> </ul>	See above ↑	
<p><b>Range Management</b></p>	<p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>Within priority sage-grouse habitat, incorporate sage-grouse habitat objectives and management considerations into all BLM grazing allotments through AMPs or permit renewals.</li> </ul>	<p><b>Pg. 69 Action 3</b> - identifies SG habitat as priority habitat.</p> <p>3 Consider the following habitats priority wildlife habitats:</p> <ul style="list-style-type: none"> <li>all listed and special status species habitats, with grizzly bear and lynx receiving the most emphasis in coniferous forest habitats, and sage grouse receiving the most emphasis in sagebrush steppe habitats</li> <li>coniferous forest and sagebrush habitats that provide important big game winter habitat</li> <li>sagebrush habitats that provide bighorn sheep year-long or seasonal habitats</li> <li>sagebrush habitats that provide sage grouse breeding, early brood rearing, or winter habitat</li> <li>mountain mahogany and sagebrush steppe habitat associations in the Lima Sweetwater Breaks key raptor management area</li> <li>all riparian and wetland habitats</li> </ul> <p>4 Consider the following species priority wildlife species:</p> <ul style="list-style-type: none"> <li>all listed and special status species, with grizzly bear, lynx, and sage grouse receiving the most emphasis</li> <li>bighorn sheep</li> </ul> <p><b>Pg. 73 Actions 42, 43, 44</b>  <b>Sagebrush Steppe Wildlife Habitats</b>  42. Use the National and Montana sage</p>	<p>No Concern</p> <p>This is a general practice being considered during WA and permit renewal.</p>



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		<p>grouse conservation strategies (see Appendix X) as the basis to address habitat management in the watershed planning process and in project level analysis.</p> <p>43. Manage sagebrush habitats so that mid-scale level shrub cover includes a mix of height classes with herbaceous understory adequate for meeting seasonal habitat requirements for sage grouse and other wildlife species that use sagebrush habitat including wintering antelope and mule deer.</p> <ul style="list-style-type: none"> <li>• In habitats with predominately mountain big sage-brush, manage sites with the potential to support sagebrush in a manner that maintains &gt; 70 percent of those areas in canopy closure of 5 to 25 percent.</li> <li>• In habitats that include predominately Wyoming big sagebrush, manage sites with ecological potential to maintain sagebrush over at least 60 per-cent of those areas in a canopy closure of 5 to 25 percent.</li> <li>• Maintain an herbaceous understory emphasizing multiple species of native forbs and grasses, recognizing that herbaceous productivity decreases at &gt;10-15 percent canopy cover.</li> <li>• Emphasize restoration and rehabilitation of sage-brush in areas that are capable of supporting sage-brush and contribute to the distribution and connectivity of patches.</li> </ul> <p>44. When making project decisions located in sage grouse habitats, objectives for sage grouse habitats and relevant information about sage grouse seasonal habitat will be considered when determining the desired</p>	

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		<p>resource condition. If specific issues regarding sage grouse are identified, applicable conservation actions or guidelines will be reviewed by interdisciplinary teams and considered in the decision-making process. None of the conservation actions or guidelines in the Management Plan and Conservation Strategies for Sage Grouse in Montana will be construed as mandatory or standards.</p> <p><b>Appendix X – pg. 208</b>  <b>Grazing Management</b>  <i>Issue: Conflicting priorities for land uses, species, and habitats.</i></p> <ol style="list-style-type: none"> <li>1. Use scientific data and historic information to establish baseline information when evaluating soil conditions and ecological processes and when monitoring seasonal sage grouse habitats.</li> <li>2. Set specific habitat objectives and implement appropriate grazing management to achieve those objectives and maintain or improve vegetation condition and trends.</li> </ol>	
	<ul style="list-style-type: none"> <li>• Work cooperatively on integrated ranch planning within sage-grouse habitat so operations with deeded/BLM allotments can be planned as single units.</li> </ul>	<p><b>Appendix X pg. 208 action 3</b>  <b>Grazing Management</b>  <i>Issue: Conflicting priorities for land uses, species, and habitats.</i></p> <ol style="list-style-type: none"> <li>3. Offer private landowners incentives when and where appropriated to achieve sage grouse objectives.</li> </ol>	<p>Being done to some degree  Ongoing during WA and permit renewal</p>
	<ul style="list-style-type: none"> <li>• Prioritize completion of land health assessments and processing grazing permits within priority sage-grouse habitat areas. Focus this process on allotments that have the best opportunities for conserving, enhancing or restoring habitat for sage-grouse. Utilize Ecological Site Descriptions (ESDs) to conduct land health assessments to determine if standards of range-land health are being met.</li> </ul>	<p><b>Livestock Grazing</b>  <b>Pg. 42 Actions 1,2 and 4</b>  <b>Actions</b></p> <ol style="list-style-type: none"> <li>1 Authorize an average of between 101,183 and 113,219 Animal Unit Months (AUMs) on about 425 allotments, subject to lands meeting the <i>Western Montana Standards for Rangeland Health</i> and make adjustments to allotments for management efficiency.</li> <li>2 Use watershed evaluations (see Map 20 for watershed areas) when authorizing</li> </ol>	<p>No Concern</p> <p>All allotments in DFO have had health assessments completed and ESD were used to determine Function.</p>

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		<p>livestock grazing to assess whether the <i>Western Montana Standards for Rangeland Health</i> (Appendix A) are being met or if changes in livestock grazing are necessary.</p> <p>3 Incorporate the <i>Guidelines for Livestock Grazing</i> as described in Appendix A into livestock grazing permits, as well as strategies outlined in <i>Best Management Practices for Grazing</i> (MT DNRC 1999), when applicable.</p> <p>4 Follow the procedures outlined in the <i>Rangeland Health Standards Handbook</i> (H-4180) for areas that do not meet the <i>Western Montana Standards for Rangeland Health</i> due to livestock grazing.</p>	
	<ul style="list-style-type: none"> <li>Conduct land health assessments that include (at a minimum) indicators and measurements of structure/condition/composition of vegetation specific to achieving sage-grouse habitat objectives (Doherty et al. 2011). If local/state seasonal habitat objectives are not available, use sage-grouse habitat recommendations from Connelly et al. 2000b and Hagen et al. 2007.</li> </ul>	<p>Answered above ↑</p> <p>Also addressed in Appendix X Sage Grouse Management and repeated under many topics here. Just keep looking</p>	<p>MT sage grouse conservation plan guidelines (based on Conley/WAFWA) are being used to determine habitat conditions</p>
	<p><b>Implementing Management Actions after Land Health and Habitat Evaluations</b></p> <ul style="list-style-type: none"> <li>Develop specific objectives to conserve, enhance or restore priority sage-grouse habitat based on ESDs and assessments (including within wetlands and riparian areas). If an effective grazing system that meets sage-grouse habitat requirements is not already in place, analyze at least one alternative that conserves, restores or enhances sage-grouse habitat in the NEPA document prepared for the permit renewal (Doherty et al. 2011b, Williams et al. 2011).</li> </ul>	<p><b>Appendix X pg. 208</b>  <i>Issue: Some sagebrush communities may have been significantly altered by past grazing management practices.</i></p> <ol style="list-style-type: none"> <li>Implement appropriate grazing management strategies and range management practices where soil conditions and ecological processes will support sage grouse and desired commodities and societal values.</li> <li>Establish suitable goals for sagebrush communities that have deteriorated to such an extent that livestock management alone may not contribute to habitat objectives.</li> </ol>	<p>No Concern</p> <p>Already being done in WA EA's</p>
	<ul style="list-style-type: none"> <li>Manage for vegetation composition and structure consistent with ecological site potential and within the reference state to achieve sage-grouse seasonal habitat objectives.</li> </ul>	<p><b>APPENDIX A  WESTERN MONTANA STANDARDS FOR RANGELAND HEALTH AND GUIDELINES FOR</b></p>	<p>No Concern</p> <p>We use to renew all AMP's Objectives are in WA EA's</p>

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		<p><b>LIVESTOCK GRAZING</b> pg. 102                      These are incorporated into DFO RMP and are being used for determinations on all allotments in DFO</p>	
	<ul style="list-style-type: none"> <li>Implement management actions (grazing decisions, AMP/Conservation Plan development, or other agreements) to modify grazing management to meet seasonal sage-grouse habitat requirements (Connelly et al. 2011c). Consider singly, or in combination, changes in:                             <ol style="list-style-type: none"> <li>Season or timing of use;</li> <li>Numbers of livestock (includes temporary non-use or livestock removal);</li> <li>Distribution of livestock use;</li> <li>Intensity of use; and</li> <li>Type of livestock (e.g., cattle, sheep, horses, llamas, alpacas and goats) (Briske et al. 2011).</li> </ol> </li> </ul>	<p><b>Appendix B - Montana BMP's for grazing pg. 105</b></p> <p><b>Appendix X Sage Grouse Management incorporates WAFWA guidelines</b></p> <p>Draft RMP Ch 2, pg 21                      Alternatives considered but eliminated - <b>Deferment of grazing turnout until July 1 Planning area wide.</b>                      Proposals to defer livestock turnout until July 1 across all grazing allotments were considered but not analyzed in detail. Processes are currently in place to make recommendations on grazing management on a site-specific basis during completion of the land health evaluations conducted on a watershed basis and subsequent allotment management planning if livestock grazing is determined to be a contributing factor in not meeting the standards. An area-wide prescription was not considered reasonable.</p>	<p>Not going to paste the whole thing here.</p> <p>No Concern                      Already being done in WA EA's</p>
	<ul style="list-style-type: none"> <li>During drought periods, prioritize evaluating effects of the drought in priority sage-grouse habitat areas relative to their needs for food and cover. Since there is a lag in vegetation recovery following drought (Thurow and Taylor 1999, Cagney et al. 2010), ensure that post-drought management allows for vegetation recovery that meets sage-grouse needs in priority sage-grouse habitat areas.</li> </ul>	<p><b>Pg. 42 Action7</b>                      7. Modify grazing schedules and livestock management practices as necessary during drought conditions.</p>	<p>Reductions were made during drought periods around 2003-2004 and post drought management was allotted for.</p>

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	<p><b><i>Riparian Areas and Wet Meadows</i></b></p> <ul style="list-style-type: none"> <li>• Manage riparian areas and wet meadows for proper functioning condition within priority sage-grouse habitats.                             <ul style="list-style-type: none"> <li>○ Within priority and general sage-grouse habitats, manage wet meadows to maintain a component of perennial forbs with diverse species richness relative to site potential (e.g., reference state) to facilitate brood rearing. Also conserve or enhance these wet meadow complexes to maintain or increase amount of edge and cover within that edge to minimize elevated mortality during the late brood rearing period (Hagen et al. 2007, Kolada et al. 2009, Atamian et al. 2010).</li> </ul> </li> </ul>	<p><b>Pg. 55</b> <b>Goal</b> Restore and maintain riparian wetland areas so that at least 955 miles of streams and 2,050 acres of wetlands are in proper functioning condition. Design management to achieve objectives (Desired Future Conditions) or initiate an upward trend in 20 years.</p> <p><b>Appendix X - Grazing Mngmt pg. 209</b> <i>Issue: Riparian areas (wet meadows, seeps, streams) are important resources for sage grouse and livestock.</i></p> <ol style="list-style-type: none"> <li>1. Design and implement livestock grazing management practices (riparian pastures, seasonal grazing, development of off-stream water facilities, etc.) to achieve riparian management objectives.</li> <li>2. Modify or adapt pipelines and natural springs, where practical, to create small wet meadows as brood habitat.</li> <li>3. ensure the sustainability of desired soil conditions and ecological processes within upland plant communities following implementation of strategies to protect riparian areas. This can be achieved by:                             <ul style="list-style-type: none"> <li>• protecting natural wet meadows and springs from over-use while developing water for livestock, and</li> <li>• plan the location, design, and construction of new fences to minimize impacts on sage grouse.</li> </ul> </li> </ol>	<p>This is current mgmt. goal on all allotments</p>

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	<ul style="list-style-type: none"> <li>• Where riparian areas and wet meadows meet proper functioning condition, strive to attain reference state vegetation relative to the ecological site description.                             <ul style="list-style-type: none"> <li>○ For example: Within priority sage-grouse habitat, reduce hot season grazing on riparian and meadow complexes to promote recovery or maintenance of appropriate vegetation and water quality. Utilize fencing/herding techniques or seasonal use or livestock distribution changes to reduce pressure on riparian or wet meadow vegetation used by sage-grouse in the hot season (summer) (Aldridge and Brigham 2002, Crawford et al. 2004, Hagen et al. 2007).</li> </ul> </li> </ul>	<p><b>pg. 55</b>  <b>Objectives (Desired Future Condition after 20- 50 years of management)</b>                      Riparian and wetland vegetation supports the biological, hydrologic, and physical components of streams and wetlands based on site-specific capabilities.</p> <p>Deciduous woody and coniferous communities are present with diverse composition, density, and age structure within site potential.</p> <p>Herbaceous plant communities are dominated by deep- rooted native species that support streambank and shore-line stability, floodplain development, and nutrient cycling. Stream channels display the dimensions, pattern, and profile that are representative of site potential (Rosgen).</p> <p>Emphasize maintenance of riparian communities on approximately 415 miles of stream dominated by a tall deciduous shrub or aspen/cottonwood habitat types and on approximately 500 miles of stream dominated by herbaceous and coniferous habitat types (based on 2002 inventory summary).</p> <p><b>Action 3</b>                      Implement the <i>Western Montana Standards for Range-land Health</i> (see Appendix A) to achieve proper functioning condition in riparian and wetland habitats. In-corporate of the <i>Guidelines for Livestock Grazing</i>, as well as strategies outlined in <i>Best Management Practices for Grazing</i> (MT DNRC 1999), when applicable.</p>	<p>No concern</p>
	<ul style="list-style-type: none"> <li>• Authorize new water development for diversion from spring or seep source only when priority sage-grouse habitat would benefit from the development. This includes</li> </ul>	<p><b>pg. 56 Action 13</b>                      Analyze water developments on a case-by-case basis, considering the following:</p>	<p>All new water developments are analyzed during watershed assessments.</p>

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	<p>developing new water sources for livestock as part of an AMP/conservation plan to improve sage-grouse habitat.</p>	<ul style="list-style-type: none"> <li>• Available water flow. In general, no water developments that remove more than 50% of average summer daily flows from a water source will be constructed unless systems can be designed for return flows back into the drainage within a 1/4 mile of the diversion.</li> <li>• Protection of source water riparian and wet-land habitat. Where isolated springs are developed, associated riparian habitat will be protected, usually through fencing.</li> <li>• Protection of other resource values from direct and indirect impacts from construction and use of the water source. Measures to protect riparian habitats and other resource values including but not limited to sensitive plant species and cultural resources will be implemented based on site-specific needs. Only off-stream water developments and/or armored water gaps will be considered on streams where fencing has excluded the riparian area to prevent impacts to various resources.</li> <li>• Location of water tanks in relation to other resource values. Measures to protect resource values in proximity to tank locations will be implemented based on site-specific needs. In general, water tanks will be placed at least 1/4 mile from unfenced stream riparian habitat.</li> </ul> <p>Appendix X pg. 209  <i>Issue: Riparian areas (wet meadows, seeps,</i></p>	<p>Impacts identified are mitigated during EA process.</p> <p>All spring sources are fenced when new developments are constructed.</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p><i>streams) are important resources for sage grouse and livestock.</i></p> <ol style="list-style-type: none"> <li>1. Design and implement livestock grazing management practices (riparian pastures, seasonal grazing, development of off-stream water facilities, etc.) to achieve riparian management objectives.</li> <li>2. Modify or adapt pipelines and natural springs, where practical, to create small wet meadows as brood habitat.</li> <li>3. Ensure the sustainability of desired soil conditions and ecological processes within upland plant communities following implementation of strategies to protect riparian areas. This can be achieved by:                             <ul style="list-style-type: none"> <li>• protecting natural wet meadows and springs from over-use while developing water for livestock, and</li> <li>• plan the location, design, and construction of new fences to minimize impacts on sage grouse.</li> </ul> </li> </ol>	
	<ul style="list-style-type: none"> <li>• Analyze springs, seeps and associated pipelines to determine if modifications are necessary to maintain the continuity of the predevelopment riparian area within priority sage-grouse habitats. Make modifications where necessary, considering impacts to other water uses when such considerations are neutral or beneficial to sage-grouse.</li> </ul>	<p>Refer to previous action above ↑</p>	<p>All new water developments are analyzed during watershed assessments.</p>
	<p><b><i>Treatments to Increase Forage for Livestock/Wild Ungulates</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Only allow treatments that conserve, enhance or restore sage-grouse habitat (this includes treatments that benefit livestock as part of an AMP/Conservation Plan to improve sage-grouse habitat.<sup>1</sup></li> </ul>	<p><b>Appendix X pg. 208</b></p> <p><i>Issue: Some sagebrush communities may have been significantly altered by past grazing management practices.</i></p> <ol style="list-style-type: none"> <li>1. Implement appropriate grazing management strategies and range management practices where soil conditions and ecological processes will support sage grouse and desired</li> </ol>	<p>No actions or “treatments” are identified specifically to increase forage for livestock.</p>

<sup>1</sup> Conserve or enhance means to allow no degradation and can mean that the improvement or livestock supplement is part of a grazing/AMP/Conservation Plan that facilitates meeting sage-grouse habitat objectives within a pasture or allotment.



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		<p>commodities and societal values.</p> <p>2. Establish suitable goals for sagebrush communities that have deteriorated to such an extent that livestock management alone may not contribute to habitat objectives.</p>	
	<ul style="list-style-type: none"> <li>Evaluate the role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to priority sage-grouse habitats to determine if they should be restored to sagebrush or habitat of higher quality for sage-grouse. If these seedings are part of an AMP/ Conservation Plan or if they provide value in conserving or enhancing the rest of the priority habitats, then no restoration would be necessary. Assess the compatibility of these seedings for sage-grouse habitat or as a component of a grazing system during the land health assessments (Davies et al. 2011).</li> </ul> <p>For example: Some introduced grass seedings are an integral part of a livestock management plan and reduce grazing pressure in important sagebrush habitats or serve as a strategic fuels management area.</p>	<p><b>Pg 51 Action 14</b>                      Improve existing seedings that are not meeting range-land health standards for plant vigor and density by implementing grazing management systems or re-seeding with appropriate species of natives or cultivars. Focus restoration of any existing seedings on areas containing high resource values and/or priority habitats and species. Allow the use of all available tools.</p> <p><b>Appendix X pg. 215</b>  <i>Issue: The age distribution of sagebrush may have been altered by management, such as a young stand recovering from disturbance or a mature stand with poor regeneration.</i></p> <ol style="list-style-type: none"> <li>Map and inventory areas believed to be deficient in quality of habitat or exhibiting poor health.</li> <li>Evaluate the site potential and desired condition, and develop specific objectives accordingly within specific landscapes.</li> <li>If sagebrush is lacking:                             <ol style="list-style-type: none"> <li>develop and implement grazing practices that influence sagebrush growth,</li> <li>inter-seed historical breeding and winter habitats with the appropriate sagebrush species,</li> <li>identify and promote seed sources for habitat restoration efforts,</li> <li>encourage the voluntary use of</li> </ol> </li> </ol>	<p>Currently evaluated during watershed analysis process, most historic seedings have converted back to sagebrush habitat.</p>

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		<p>sagebrush in habitat incentive programs, such as the Conservation Reserve Program, and work to develop additional funding sources for such programs,</p> <p>e) reclaim and/or re-seed areas disturbed by treatments when necessary, and</p> <p>f) promote sage plantings, where appropriate, on project areas occurring within sage grouse habitats.</p> <p><i>Issue: The plant community has been altered and lack a diverse herbaceous understory.</i></p> <ol style="list-style-type: none"> <li>1. Map and inventory areas believed to be important sage grouse breeding habitats.</li> <li>2. Evaluate the site potential and desired condition within the context of a larger landscape.</li> <li>3. Develop and implement techniques to increase herbaceous diversity and density in sagebrush-steppe within ecological limits.</li> <li>4. Ensure that grazing practices allow plants to grow to seed ripe on a rotational basis.</li> <li>5. Adjust livestock grazing management when necessary, such as the season of use/projects, to promote forb establishment and recruitment.</li> <li>6. Identify large areas of introduced plant species, such as crested wheat, and determine if restoration efforts are deemed appropriate.</li> <li>7. Inter-seed appropriate breeding habitats with forbs as identified by the specialists and affected interests.</li> </ol>	
	<p><b><i>Structural Range Improvements and Livestock Management Tools</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Design any new structural range improvements and location</li> </ul>	<p><b>Pg 69 Actions 7, 8, 9, 16</b></p> <p>7. Install functional wildlife access ramps</p>	<p>No Concerns</p>

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	<p>of supplements (salt or protein blocks) to conserve, enhance, or restore sage-grouse habitat through an improved grazing management system relative to sage-grouse objectives. Structural range improvements, in this context, include but are not limited to: cattleguards, fences, exclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments. Potential for invasive species establishment or increase following construction must be considered in the project planning process and monitored and treated post-construction.</p>	<p>on all water tanks on public lands.</p> <p>8. Modify existing fences on public land identified as barriers to wildlife movement to accommodate wildlife passage.</p> <p>9. Follow "wildlife friendly" fence specifications in BLM Manual H1741-1 for new fences.</p> <p>16. Coordinate when new roads are proposed for construction and/or when changes are proposed regarding travel restrictions on existing roads to determine if concerns with wildlife displacement and/or habitat fragmentation exist. See the <i>Travel Management</i> section for additional details.</p> <p><b>Pg. 73 Action 44</b></p> <p>44. When making project decisions located in sage grouse habitats, objectives for sage grouse habitats and relevant information about sage grouse seasonal habitat will be considered when determining the desired resource condition. If specific issues regarding sage grouse are identified, applicable conservation actions or guidelines will be reviewed by interdisciplinary teams and considered in the decision-making process. None of the conservation actions or guidelines in the Management Plan and Conservation Strategies for Sage Grouse in Montana will be construed as mandatory or standards.</p> <p><b>Appendix X Pg. 211 and 212 – Noxious Weed Mgmt</b></p> <p><i>Issue: Weed infestations result in loss of native grass, forb, and sagebrush abundance and diversity.</i></p> <ul style="list-style-type: none"> <li>• Promote measures that prevent the introduction and spread of weed seeds and other reproducing plant parts.</li> </ul>	

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p><i>Issue: It is important to maintain viable sagebrush habitat and populations of sage grouse while eradicating infestations of noxious weeds.</i></p> <ol style="list-style-type: none"> <li>1. Employ integrated weed management treatment methods such as a combination of biological and cultural, such as grazing, mowing, or seeding treatments in conjunction with herbicides to manage weeds in sage grouse habitat.</li> <li>2. Use the most selective herbicides where chemical treatment is appropriate, to minimize loss of non-target plant species.</li> <li>3. Restore plant communities with desired species adapted to the site, using proven management techniques where biologically feasible. A restoration program may be necessary if conditions prevent natural plant species.</li> </ol> <p><i>Issue: New weed infestations are often undetected.</i></p> <ul style="list-style-type: none"> <li>• Establish a monitoring protocol to detect new infestations.</li> </ul>	
	<ul style="list-style-type: none"> <li>• When developing or modifying water developments, use best management practices (BMPs, see Appendix C) to mitigate potential impacts from West Nile virus (Clark et al. 2006, Doherty 2007, Walker et al. 2007b, Walker and Naugle 2011).</li> </ul>	<p><b>Appendix X pg. 211</b></p> <p><i>Issue: Water discharge and impoundments can degrade or inundate breeding, nesting, and winter habitat.</i></p> <ol style="list-style-type: none"> <li>1. Design impoundments and manage discharge so as not to degrade or inundate leks, nesting sites, and wintering sites.</li> <li>2. Protect natural springs from any source of disturbance or degradation from energy-related activities.</li> </ol>	<p>Are these BMP's specific to CBM development? WNV has not been identified as an issue in the DFO may be that the species of mosquito that is a carrier cannot survive at this elevation/climate.</p> <p>Could incorporate BMP's in Appendix C into RMP if needed.</p> <p>Can discuss risk of WNV in EA's and may not need to be incorporated in RMP.</p>

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	<ul style="list-style-type: none"> <li>• Evaluate existing structural range improvements and location of supplements (salt or protein blocks) to make sure they conserve, enhance or restore sage-grouse habitat.                             <ul style="list-style-type: none"> <li>○ To reduce outright sage-grouse strikes and mortality, remove, modify or mark fences in high risk areas within priority sage-grouse habitat based on proximity to lek, lek size, and topography (Christiansen 2009, Stevens 2011).</li> <li>○ Monitor for, and treat invasive species associated with existing range improvements (Gelbard and Belnap 2003 and Bergquist et al. 2007).</li> </ul> </li> </ul>	<p><b>Pg 69 Actions 8 and 9</b></p> <p>8. Modify existing fences on public land identified as barriers to wildlife movement to accommodate wildlife passage.</p> <p>9. Follow "wildlife friendly" fence specifications in BLM Manual H1741-1 for new fences.</p> <p><b>Appendix X pg 209</b>  <i>Issue: Potential for sage grouse to be disturbed or displaced by concentrations of livestock near leks or winter habitat.</i></p> <p>1. Discourage concentration of livestock on leks or other key sage grouse habitats.                             <ul style="list-style-type: none"> <li>• Avoid placement of salt or mineral supplements near leks during the breeding season (March-June), and</li> <li>• Avoid supplemental winter feeding of livestock , where practical, on sage grouse winter habitat and around leks</li> </ul> </p> <p><i>Issue: Existing fences near breeding, brood-rearing, or winter habitats can increase the risk of collision mortalities and /or predation on sage grouse by hawks, eagles, and ravens by providing perches.</i></p> <p>1. If portions of existing fences are found to pose a significant threat to sage grouse as strike sties or raptor perches, mitigate through moving or modifying posts, implementation of predator control programs, etc. Actions may include increasing the visibility of the fences by flagging or by designing “take-down” fences.</p> <p>2. Offer private landowners incentives when and where appropriate to achieve sage grouse objectives.</p> <p><b>Appendix X Pg 211- 212 Noxious Weed Mgmnt</b>  <i>Issue: Weed infestations result in loss of native grass, forb, and sagebrush</i></p>	<p>No concern</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p><i>abundance and diversity.</i></p> <ul style="list-style-type: none"> <li>Promote measures that prevent the introduction and spread of weed seeds and other reproducing plant parts.</li> </ul> <p><i>Issue: It is important to maintain viable sagebrush habitat and populations of sage grouse while eradicating infestations of noxious weeds.</i></p> <ol style="list-style-type: none"> <li>Employ integrated weed management treatment methods such as a combination of biological and cultural, such as grazing, mowing, or seeding treatments in conjunction with herbicides to manage weeds in sage grouse habitat.</li> <li>Use the most selective herbicides where chemical treatment is appropriate, to minimize loss of non-target plant species.</li> <li>Restore plant communities with desired species adapted to the site, using proven management techniques where biologically feasible. A restoration program may be necessary if conditions prevent natural plant species.</li> </ol> <p><i>Issue: New weed infestations are often undetected.</i></p> <ul style="list-style-type: none"> <li>Establish a monitoring protocol to detect new infestations.</li> </ul>	
	<p><i>Retirement of Grazing Privileges</i></p> <ul style="list-style-type: none"> <li>Maintain retirement of grazing privileges as an option in priority sage-grouse areas when base property is transferred or the current permittee is willing to retire grazing on all or part of an allotment. Analyze the adverse impacts of no livestock use on wildfire and invasive species threats (Crawford et al. 2004) in evaluating retirement proposals.</li> </ul> <p><i>Planning direction Note:</i> Each planning effort will identify the specific allotment(s) where permanent retirement of grazing privileges is potentially beneficial.</p>	<p><b>pg. 43 Allocations</b></p> <p>Manage approximately 47,837 acres of public land as un-available for livestock grazing (see Map 19, oversized). No term grazing permits or leases would be issued for these areas. These areas could be grazed with livestock on a temporary nonrenewable basis to meet resource objectives of the area. Lands that are not available include:</p> <ul style="list-style-type: none"> <li>Unallotted areas</li> <li>Blue Lake</li> <li>Eli Springs area</li> </ul> <p>Maintain the Cross and Exchange</p>	<p><b>DO NOT</b> like the idea of identifying potential permanent retirement of allotments during planning process. This could make for strange relations between the permittees and BLM staff.</p> <p>What is the cause and effect justification for this?</p>

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		<p>Allotments as Resource Reserve Allotments. (A Resource Reserve Allotment is a unit of public land that will not have term grazing permits issued. Such an allotment will only be grazed on a temporary nonrenewable basis. The use of these allotments will be to provide temporary grazing to rest other areas following wildfire, habitat treatments, or to allow for more rapid attainment of rangeland health. The allotment must be of sufficient size to be managed as a discrete unit. Resource Reserve Allotments should be distributed throughout the planning area).</p> <p>Designate Resource Reserve Allotments on a case-by-case basis following watershed evaluations as described in <i>Livestock Grazing Actions</i> 20, 21, and 22. (pg. 43)</p> <p>Maintain all current riparian exclosures as un-leased for live-stock grazing.</p>	<p>If warranted no grazing is analyzed on specific parcels or pastures/allotments during Watershed assessments.</p>
<p><b>Wild Horse and Burro Management</b></p>	<p><i>Ongoing Authorizations/Activities</i></p> <ul style="list-style-type: none"> <li>• Manage wild horse and burro population levels within established Appropriate Management Levels (AML).</li> <li>• Prioritize gathers in priority sage-grouse habitat, unless removals are necessary in other areas to prevent catastrophic environmental issues, including herd health impacts.</li> </ul> <p><i>Proposed Authorization/Activities</i></p> <ul style="list-style-type: none"> <li>• Within priority sage-grouse habitat, develop or amend herd management area plans (HMAPs) to incorporate sage-grouse habitat objectives and management considerations for all BLM herd management areas (HMAs).                             <ul style="list-style-type: none"> <li>○ For all HMAs within priority sage-grouse habitat, prioritize the evaluation of all AMLs based on indicators that address structure/condition/composition of vegetation and measurements specific to achieving sage-grouse</li> </ul> </li> </ul>	<p>Not applicable Addressed in RMP on pg. 67</p>	<p>No Concern No wild horse herd in DFO</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
	<p>habitat objectives.</p> <ul style="list-style-type: none"> <li>Coordinate with other resources (Range, Wildlife, and Riparian) to conduct land health assessments to determine existing structure/condition/composition of vegetation within all BLM HMAs.</li> <li>When conducting NEPA analysis for wild horse and burro management activities, water developments or other rangeland improvements for wild horses in priority sage-grouse habitat, address the direct and indirect effects to sage-grouse populations and habitat. Implement any water developments or rangeland improvements using the criteria identified for domestic livestock identified above in priority habitats.</li> </ul>		
<p><b>Minerals</b></p>	<p><b><u>Fluid Minerals</u></b></p> <p><b><i>Unleased Federal Fluid Mineral Estate</i></b></p> <p><i>Alternative A</i></p> <ul style="list-style-type: none"> <li>Close priority sage-grouse habitat areas to fluid mineral leasing. Upon expiration or termination of existing leases, do not accept nominations/expressions of interest for parcels within priority areas.</li> <li>Allow geophysical exploration within priority sage-grouse habitat areas to obtain exploratory information for areas outside of and adjacent to priority sage-grouse habitat areas. Allow geophysical operations only by helicopter-portable drilling methods and in accordance with seasonal timing restrictions and/or other restrictions that may apply.</li> </ul>	<p><b>RMP Final EIS Alt. C</b>  <b>Pg. 53 Table 6</b> lists stipulations that were analyzed.                      Winter/Spring habitat – NL                      Leks – NL ½ mile buffer                      Breeding habitat – NSO</p> <p>NL = no lease                      NSO = no surface occupancy</p> <p>Under Alternative C, 80 percent (1,086,596 acres) of the planning area would not be available for oil and gas leasing. This includes all the lands identified in Alternative B, plus lands in these additional locations:</p> <ul style="list-style-type: none"> <li>Sage Grouse Winter/Spring Range</li> <li>Lands within 1/2 mile of Sage Grouse Strutting Grounds (leks)</li> </ul> <p><b>Final RMP Pg. 46</b>  <b>Goal 2</b>                      Allow environmentally responsible geophysical exploration for energy resources in the Dillon Field Office on lands</p>	<p>No Lease was analyzed under alt C in draft RMP. See below for Final Decision</p> <p>I feel this is adequate as we have no active drilling/wells and no APD's in DFO</p> <p>Online link to BMP's for Fluid Minerals located in Appendix B                      Also see Washington Office IM No. 2004-194.</p> <p>Also refer to <b>Appendix M</b> Procedures in oil and gas recovery.                      In DFO ROD/RMP</p>



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		<p>ad-administered by the BLM.</p> <p><b>Actions</b></p> <ol style="list-style-type: none"> <li>1 Review Notices of Intent to Conduct Geophysical Exploration (NOI) in the planning area and develop appropriate mitigation measures so as not to create undue and unnecessary degradation.</li> <li>2 Prepare a site-specific environmental analysis for each NOI filed. Develop mitigation measures using the oil and gas lease stipulations approved in this plan as the starting point.                             <ul style="list-style-type: none"> <li>• The transient nature of geophysical exploration and the short-term impacts of the exploration may provide an opportunity for operations to occur in seasonal wildlife areas during the time of closure under lease stipulations without creating detrimental effects on wild-life. As such the proposed exploration will be analyzed for the length and nature of its impact to determine if operations can be allowed during the period of closure found in lease stipulation(s).</li> <li>• Allow geophysical exploration on a case-by- case basis in areas closed to oil and gas leasing based on the nature and level of impacts from the exploration, and consistency with other applicable policy.</li> <li>• Geophysical operations may also be allowed in areas of No Surface Occupancy (NSO) stipulations for oil and gas leasing. A determination will be made considering the nature and impacts of the</li> </ul> </li> </ol>	<p>Any geophysical exploration would require site specific NEPA</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p>proposed exploration and the reason behind the NSO restriction. This will be documented and be the basis for allowing or not allowing geophysical exploration in NSO areas.</p> <p>3 Apply travel restrictions based on route designations made through travel management decision to geophysical exploration, with consideration given to exceptions as appropriate and granted on a case-by-case basis.</p>	
	<p><i>Alternative B</i></p> <ul style="list-style-type: none"> <li>• Close priority sage-grouse habitat areas to fluid mineral leasing. Consider an exception: <ul style="list-style-type: none"> <li>○ When there is an opportunity for the BLM to influence conservation measures where surface and/or mineral ownership is not entirely federally owned (i.e., checkerboard ownership). In this case, a plan amendment may be developed that opens the priority area for new leasing. The plan must demonstrate long-term population increases in the priority area through mitigation (prior to issuing the lease) including lease stipulations, off-site mitigation, etc., and avoid short-term losses that put the sage-grouse population at risk from stochastic events leading to extirpation.</li> </ul> </li> <li>• Allow geophysical exploration within priority sage-grouse habitat areas to obtain exploratory information for areas outside of and adjacent to priority sage-grouse habitat areas. Only allow geophysical operations by helicopter-portable drilling methods and in accordance with seasonal timing restrictions and/or other restrictions that may apply.</li> </ul>	<p><b>Appendix X. pg 210-211</b>  <b>Mining and Energy Development</b>  <i>Issue: Energy development may adversely affect sage grouse.</i></p> <ol style="list-style-type: none"> <li>1. Work cooperatively – agencies, utilities, and landowners – to identify and map important seasonal ranges for sage grouse.</li> <li>2. Complete a broad scale assessment to identify important areas that require additional protection or conservation during land use planning and leasing of energy reserves.</li> <li>3. Prioritize areas relative to their need for protection – ranging from complete protection to availability for moderate to high levels of energy development.</li> <li>4. Encourage development in incremental stages to stagger disturbance (federal leases range from 3-10 years); design schedules that include long-term strategies to localize disturbance and recovery within established zones over a staggered time frame.</li> <li>5. Provide technical assistance to private landowners who lease privately owned fee minerals.</li> <li>6. Use off-site mitigation, such as the creation of sage-brush habitat, or</li> </ol>	<p>↑Refer to response above for Fluid Minerals Alternative A</p>

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		<p>purchase conservation easements with industry dollars to offset habitat losses.</p> <p>7. Remove facilities and infrastructure when use is completed.</p> <p>8. Enhance our understanding of the effects of energy development through:</p> <ul style="list-style-type: none"> <li>a) pre-activity inventory,</li> <li>b) monitoring over the life of the development, and</li> <li>c) Annual evaluations.</li> </ul> <p><i>Issue: Increased roads, pipelines, and power lines can fragment sagebrush habitats.</i></p> <ul style="list-style-type: none"> <li>1. Develop a comprehensive infrastructure plan prior to energy development activities to minimize road densities.</li> <li>2. Avoid locating roads and power lines in crucial sage grouse breeding, nesting, and wintering areas.</li> <li>3. See conservation actions for siting and constructing power lines.</li> </ul> <p>4. Use minimal surface disturbance to install roads and pipelines and reclaim site of abandoned wells to natural communities.</p> <p><i>Issue: Energy-related facilities located within 2 miles of a sage grouse lek can degrade habitat quality within existing leases.</i></p> <ul style="list-style-type: none"> <li>1. Locate storage facilities, generators, and holding tanks outside the line of sight and sound of important breeding habitat.</li> <li>2. Minimize ground disturbance in sagebrush stands with documented use by sage grouse: <ul style="list-style-type: none"> <li>a) breeding habitat – the lek and associated stands of sagebrush,</li> <li>b) nesting habitat – stands of sagebrush within 2 miles of a lek, and</li> <li>c) wintering habitat – sagebrush stands</li> </ul> </li> </ul>	

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		<p>with documented winter use by sage grouse with portions that would remain above the snow even during years of deep-snow conditions.</p> <p>3. Concentrate energy-related facilities when practicable.</p> <p><b>RMP/Final EIS Alt. A Pg. 56 Alternative A</b>                      Vehicular use would be restricted for geophysical exploration on an estimated 65,544 acres in the following areas:</p> <ul style="list-style-type: none"> <li>• East Fork of Blacktail Deer Creek</li> <li>• Centennial Mountains</li> <li>• Upper Clark Canyon</li> <li>• Axolotl Lakes Area</li> <li>• Madison River</li> <li>• Big Hole River</li> <li>• on unstable and highly erodible soils</li> <li>• on paleontological sites.</li> </ul> <p><b>Map 31</b> depicts these areas. Geophysical exploration in the rest of the planning area would be evaluated on a case-by-case basis.</p>	
	<p><b><i>Leased Federal Fluid Mineral Estate</i></b></p> <p><u>Priority sage-grouse habitat areas</u> (with varying levels of exploration &amp; development)</p> <p>Apply the following conservation measures through Resource Management Plan (RMP) implementation decisions (e.g., approval of an Application for Permit to Drill, Sundry Notice, etc.) and upon completion of the environmental record of review (43 CFR 3162.5), including appropriate documentation of compliance with NEPA. In this process evaluate, among other things:</p> <ol style="list-style-type: none"> <li>1. Whether the conservation measure is “reasonable” (43 CFR 3101.1-2) with the valid existing rights; and</li> <li>2. Whether the action is in conformance with the approved RMP.<sup>2</sup></li> </ol>	<p><b>Pg. 45 Action 3</b>                      Manage oil and gas leases existing prior to the Record of Decision for the Dillon RMP according to the exist-ing lease stipulations. When the lease expires, manage those lands according to the oil and gas decisions and required stipulations outlined in the ROD/Approved Plan.</p> <p>All stipulations for fluid mineral development apply to geophysical explorations as well. All leased parcels have stipulations applied consistent with DFO RMP as outlined in Table 5 on pg 44 of RMP.                      (Did not attempt to paste table in here for</p>	<p>DFO currently does not have any level of development. Last geophysical exploration was in 2008. Nothing has been developed on those leases</p> <p>May need plan amendment to update the ¼ mile NSO currently in DFO RMP to 4m NSO if warranted.</p> <p>Can add Appendix D BMP’s</p>

<sup>2</sup> Plan conformance means, “a resource management action shall be specifically provided for in the plan, or if not specifically mentioned, shall be clearly consistent with the terms, conditions, and decisions of the approved plan or amendment.” 43 CFR 1601.0-5(b).

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	<p>Provide the following conservation measures as terms and conditions of the approved RMP:</p> <ul style="list-style-type: none"> <li>• Do not allow new surface occupancy on federal leases within priority habitats, this includes winter concentration areas (Doherty et al. 2008, Carpenter et al. 2010) during any time of the year. Consider an exception:               <ul style="list-style-type: none"> <li>○ If the lease is entirely within priority habitats, apply a 4-mile NSO around the lek, and limit permitted disturbances to 1 per section with no more than 3% surface disturbance in that section.</li> <li>○ If the entire lease is within the 4-mile lek perimeter, limit permitted disturbances to 1 per section with no more than 3% surface disturbance in that section. Require any development to be placed at the most distal part of the lease from the lek, or, depending on topography and other habitat aspects, in an area that is less demonstrably harmful to sage-grouse.</li> </ul> </li> <li>• Apply a seasonal restriction on exploratory drilling that prohibits surface-disturbing activities during the nesting and early brood-rearing season in all priority sage-grouse habitat during this period.</li> <li>• Do not use Categorical Exclusions (CXs) including under the Energy Policy Act of 2005, Section 390 in priority sage-grouse habitats due to resource conflicts.</li> <li>• Complete Master Development Plans in lieu of Application for Permit to Drill (APD)-by-APD processing for all but wildcat wells.</li> <li>• When permitting APDs on existing leases that are not yet developed, the proposed surface disturbance cannot exceed 3% for that area. Consider an exception if:               <ul style="list-style-type: none"> <li>○ Additional, effective mitigation is demonstrated to offset the resulting loss of sage-grouse (see</li> </ul> </li> </ul>	<p>formatting reasons)</p> <p><b>RMP Final EIS Alt. C</b>  <b>Pg. 53 Table 6</b> lists stipulations that were analyzed.            Winter/Spring habitat – NL            Leks – NL ½ mile buffer            Breeding habitat – NSO</p> <p>NL = no lease            NSO = no surface occupancy</p> <p>Under Alternative C, 80 percent (1,086,596 acres) of the planning area would not be available for oil and gas leasing. This includes all the lands identified in Alternative B, plus lands in these additional locations:</p> <ul style="list-style-type: none"> <li>• Sage Grouse Winter/Spring Range</li> <li>• Lands within 1/2 mile of Sage Grouse Strutting Grounds (leks)</li> </ul> <p><b>DFO RMP Appendix M pg. 156, pp 5</b>            The BLM planning process is the mechanism used to evaluate and determine where and how federal oil and gas resources will be made available for leasing. <b>In areas where oil and gas development may conflict with other resources, the areas may be closed to leasing.</b> Areas where oil and gas development could coexist with other land uses or resources will be open to leasing. Leases in these areas will be issued with standard lease terms or with added stipulations based upon decisions in the land use document. Added stipulations are a part of the lease only when environmental and planning records demonstrate the necessity for the stipulations (modifications of the lease).</p> <p><b>DFO Proposed RMP/Final EIS Appendix H pg. 85-86</b></p>	

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	<p>Objectives).</p> <ul style="list-style-type: none"> <li>▪ When necessary, conduct additional, effective mitigation in 1) priority sage-grouse habitat areas or – less preferably – 2) general sage-grouse habitat (dependent upon the area-specific ability to increase sage-grouse populations).</li> <li>▪ Conduct additional, effective mitigation first within the same population area where the impact is realized, and if not possible then conduct mitigation within the same Management Zone as the impact, per 2006 WAFWA Strategy – pg 2-17.</li> </ul> <ul style="list-style-type: none"> <li>• Require unitization when deemed necessary for proper development and operation of an area (with strong oversight and monitoring) to minimize adverse impacts to sage-grouse according to the Federal Lease Form, 3100-11, Sections 4 and 6.</li> <li>• Identify areas where acquisitions (including subsurface mineral rights) or conservation easements, would benefit sage-grouse habitat.</li> <li>• Require a full reclamation bond specific to the site. Insure bonds are sufficient for costs relative to reclamation (Connelly et al. 2000, Hagen et al. 2007) that would result in full restoration. Base the reclamation costs on the assumption that contractors for the BLM will perform the work.</li> <li>• Make applicable Best Management Practices (BMPs, see Appendix D) mandatory as Conditions of Approval within priority sage-grouse habitat.</li> </ul>	<p><b>SUMMARY OF THE REASONABLE FORESEEABLE DEVELOPMENT SCENARIO FOR OIL AND GAS</b></p> <p>Based on our analysis, we estimate that six wildcat wells could be drilled in the area in the next 10 to 15 years. (A “wildcat well” is an exploratory well drilled in an area with no existing production.) Of these six wells, we estimate that four would be dry holes. (If no economically producible oil or gas is discovered, a well is called a “dry hole” or “noncommercial discovery.”) Dry holes would be plugged and abandoned with surface reclamation occurring shortly afterward. For analysis purposes, we believe that two of the wells could likely have gas discoveries (however there is also a lower chance of oil production). One producer would be on either BLM minerals or lands administered by the Forest Service. The other would be on privately owned minerals. Each of those wells would probably prompt additional step-out wells. (A “step-out well” is a well drilled adjacent to or near a proven well to establish the limits of the oil or gas reservoir.) For analysis purposes, we estimate that a total of four step-out wells would be drilled, two for each discovery.</p> <p><b>DFO Proposed RMP/Final EIS Appendix H - table at bottom of pg. 88</b> Total disturbed acres for development would be less than 580 Acres</p>	<p>←←</p> <p>See scenario analyzed in RMP for full field development. max of ten wells could be drilled over the life of the RMP</p> <p>RMP plan amendment would be needed to exceed this over the life of the plan.</p>

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	<p><b><u>Solid Minerals</u></b></p> <p><b><i>Coal</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• <i>Surface mines</i>: Find unsuitable all surface mining of coal under the criteria set forth in 43 CFR 3461.5.</li> <li>• <i>Sub-surface mines</i>: Grant no new mining leases unless all surface disturbances (appurtenant facilities) are placed outside of the priority sage-grouse habitat area.</li> <li>• For coal mining operations on existing leases: <ul style="list-style-type: none"> <li>○ <i>Sub-surface mining</i>: in priority sage-grouse habitat areas, place any new appurtenant facilities outside of priority areas. Where new appurtenant facilities associated with the existing lease cannot be located outside the priority sage-grouse habitat area, co-locate new facilities within existing disturbed areas. If this is not possible, then build any new appurtenant facilities to the absolute minimum standard necessary.</li> </ul> </li> </ul>	<p><b><u>Proposed RMP/Final EIS Ch 2 pg. 55</u></b></p> <p><b><u>Coal and Oil Shale</u></b></p> <p><b>Management Common to All Alternatives</b></p> <p>Under all alternatives, BLM would consider proposals for coal and oil shale leasing on a case-by-case basis for mineral resources under the administration of the federal government. To date, no areas have been identified with economic reserves to support future leasing analysis. Site-specific environmental analysis and a plan amendment would be required to lease for coal or oil shale.</p> <p>There are currently no regulations governing the leasing of oil shale. Any leases issued would be issued under the authority of 30 U.S.C. Chapter 3A, Subchapter V, Sec. 241 which authorizes the Secretary of the Interior to lease deposits of oil shale. Unsuitability criteria described in 43 CFR 3461 would be applied to coal lands determined to have development potential on a case-by-case.</p> <p><b>ROD/RMP pg45 - Action 9</b></p> <p>Consider proposals for coal and oil shale leasing on a case-by-case basis. A plan amendment would be necessary to lease, along with the appropriate level of environmental analysis.</p> <ul style="list-style-type: none"> <li>• Issue any oil shale leases under the authority of 30 U.S.C. Chapter 3A, Subchapter V, Sec. 241 which authorizes the Secretary of the Interior to lease deposits of oil shale</li> <li>• Apply unsuitability criteria described in 43 CFR Part 3461 to coal lands determined to have development potential on a case-by-</li> </ul>	<p>No Concern</p> <p>Currently no coal mining operations in DFO</p>

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		case basis.	
	<p><u>General sage-grouse habitat</u></p> <ul style="list-style-type: none"> <li>• Apply minimization of surface-disturbing or disrupting activities (including operations and maintenance) where needed to reduce the impacts of human activities on important seasonal sage-grouse habitats. Apply these measures during activity level planning.                             <ul style="list-style-type: none"> <li>○ Use additional, effective mitigation to offset impacts as appropriate (determined by local options/needs).</li> </ul> </li> </ul>	SAME AS ABOVE	No concern
	<b><i>Locatable Minerals</i></b>		



Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
	<p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Propose withdrawal from mineral entry based on risk to the sage-grouse and its habitat from conflicting locatable mineral potential and development.                             <ul style="list-style-type: none"> <li>○ Make any existing claims within the withdrawal area subject to validity patent exams or buy out. Include claims that have been subsequently determined to be null and void in the proposed withdrawal.</li> <li>○ In plans of operations required prior to any proposed surface disturbing activities, include the following:                                     <ul style="list-style-type: none"> <li>▪ Additional, effective mitigation in perpetuity for conservation (In accordance with existing policy, WO IM 2008-204). Example: purchase private land and mineral rights or severed subsurface mineral rights within the priority area and deed to US Government).</li> <li>▪ Consider seasonal restrictions if deemed effective.</li> </ul> </li> </ul> </li> </ul>	<p><b>Proposed RMP/Final EIS</b> <b>Ch 2 pg. 57</b></p> <p><b>LOCATABLE MINERALS</b></p> <p><b>Goal – Encourage and facilitate development of locatable minerals in the manner to prevent unnecessary or undue degradation.</b></p> <p><b>Management Common to All Alternatives</b></p> <p>Standard management practices in the public land administration of locatable minerals would continue across all alternatives. BLM would coordinate with MT DEQ during the review, approval, inspection and reclamation of mining operations. At a minimum, conduct annual compliance inspections on each active notice. Requirements of all state and federal laws would be met in the management of mining operations.</p> <p>Administration of locatable minerals on public lands would continue as required by law and regulation (43 CFR 3809) by taking the following steps:</p> <ul style="list-style-type: none"> <li>• Review and process notices to ensure the proposed action does not create unnecessary or undue degradation of the environment.</li> <li>• Review and process plans of operation to ensure the proposed action does not create unnecessary or undue degradation of the environment.</li> <li>• Conduct at a minimum annual compliance inspections on each active notice and plan of operation.</li> </ul>	<p>Would like clearer guidance on the buyout of patent exams</p>

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		<ul style="list-style-type: none"> <li>• Allow casual use where work is done by hand and no explosives are used. Refer inquiries to appropriate agencies for further guidance on other permit requirements.</li> </ul> <p>Terms and conditions would be applied to mining activities (within the constraints of the mining law) to meet land health standards for uplands, riparian and wetlands, water quality, air quality, and native plant and animal species.</p> <p><b>ROD/RMP pg. 46</b>  <b>Locatable Minerals</b>  <i>Goal</i>                      Encourage and facilitate development of locatable minerals in a manner to prevent unnecessary or undue degradation.  <i>Allocations</i>                      Manage approximately 30,000 acres of federal mineral estate currently withdrawn from operation of the mining law as closed to locatable mineral entry (see Map 16, oversized), but review as necessary prior to expiration (if applicable) to determine whether the withdrawals should be extended, revoked, or modified. This includes the Bear Trap Unit of the Lee Metcalf Wilderness, the Beaverhead River acquisition, FERC Power Projects on the Madison River and Wisconsin Creek, the reservoir site reserve for Lima Reservoir, areas withdrawn for several BLM recreation sites, public</p>	
	<ul style="list-style-type: none"> <li>▪ Make applicable Best Management Practices (see Appendix E) mandatory as Conditions of Approval within priority sage-grouse habitat.</li> </ul>		Appendix E BMP's could be amended to the DFO RMP – MOST if not all are already used when site specific NEPA is done.

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	<p><b><i>Non-energy Leasable Minerals (i.e. sodium, potash)</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Close priority habitat to non-energy leasable mineral leasing. This includes not permitting any new leases to expand an existing mine.</li> <li>• For existing non-energy leasable mineral leases, in addition to the solid minerals BMPs (Appendix E), follow the same BMPs applied to Fluid Minerals (Appendix D), when wells are used for solution mining.</li> </ul>	<p><b>Proposed RMP/Final EIS</b></p> <p><b>Ch 2 pg. 59</b></p> <p><b>Alternative C</b></p> <p>Under this alternative, no new mineral material sites would be established over the life of the plan. Currently authorized sites would be maintained until material was exhausted or other circumstances warranted closure. As a result, 681 acres in the planning area would be open to mineral material disposal (existing sites) as shown on <b>Map 38</b> and the remaining planning area would be closed.</p>	<p>Closing all priority habitat to any mineral leasing may mean it cannot occur anywhere on DFO. Is this consistent with multiple use?</p> <p>Appendix B pg. 106 – Incorporates Montana Placer Mining BMP’s</p> <p>Appendix D&amp;E BMP’s could be amended to the DFO RMP – MOST if not all are already used when site specific NEPA is done.</p>
	<p><b><i>Saleable Mineral Materials</i></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Close priority habitat to mineral material sales.</li> <li>• Restore saleable mineral pits no longer in use to meet sage-grouse habitat conservation objectives.</li> </ul>	<p><b>Proposed RMP/Final EIS</b></p> <p><b>Ch 2 pg. 59</b></p> <p><b>Alternative C</b></p> <p>Under this alternative, no new mineral material sites would be established over the life of the plan. Currently authorized sites would be maintained until material was exhausted or other circumstances warranted closure. As a result, 681 acres in the planning area would be open to mineral material disposal (existing sites) as shown on <b>Map 38</b> and the remaining planning area would be closed.</p>	<p>See comment above</p> <p>Analyzed under alt C</p> <p>Also refer to <b>Appendix N</b> Standard operating procedures for Mineral material sites in DFO ROD/RMP pg. 169</p>
	<p><b><u>Mineral Split Estate</u></b></p> <p><u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>• Where the federal government owns the mineral estate, and the surface is in non-federal ownership, apply the conservation measures applied on public lands.</li> <li>• Where the federal government owns the surface, and the mineral estate is in non-federal ownership, apply appropriate Fluid Mineral BMPs (see Appendix D) to surface development.</li> </ul>	<p><b>DFO ROD/RMP pg. 44 Allocations</b></p> <p>Make the remainder of federal mineral estate in the planning area (approximately 1,209,278 acres) available for leasing, subject to the stipulations specified in Table 5 or under Standard Lease Terms.</p> <ul style="list-style-type: none"> <li>• Approximately 433,797 acres are available for oil and gas leasing, subject to No Surface Occupancy stipulations.</li> <li>• Approximately 632,061 acres are available for oil and gas leasing,</li> </ul>	<p>Would this apply to all minerals fluid and hard rock?</p> <p>Can add Appendix D to amended RMP if needed.</p>

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		<p>subject to Timing Limitations and/or Controlled Surface Use stipulations.</p> <ul style="list-style-type: none"> <li>Approximately 143,420 acres are available and subject to standard lease terms (and to the CSUs listed on Table 5 that apply to the entire planning area)</li> </ul> <p><b>Appendix M - Spilt Estate, pg. 167</b>                      On split estate lands where the surface ownership is private, the BLM places necessary restrictions and requirements on its leases and permit approvals and works in cooperation with the surface owner. BLM has established policies for the management of federal oil and gas resources in accordance with federal laws and regulations.                      The BLM does not have the legal authority to regulate how private surface is managed. BLM does have the statutory authority to require measures by lessees to avoid or minimize adverse impacts that may result from federally authorized mineral lease activities. These measures, in the form of lease stipulations or permit conditions of approval, are intended to protect or preserve the privately owned resources and prevent adverse impacts to adjoining lands, not to dictate management to the surface owner.</p>	
<p><b>Wildfire                      Suppression,                      Fuels                      Management and                      Fire                      Rehabilitation</b></p>	<p><b>Fuels Management</b>  <u>Priority sage-grouse habitat areas</u></p> <ul style="list-style-type: none"> <li>Design and implement fuels treatments with an emphasis on protecting existing sagebrush ecosystems.                             <ul style="list-style-type: none"> <li>Do not reduce sagebrush canopy cover to less than 15% (Connelly et al. 2000, Hagen et al. 2007) unless a fuels management objective requires additional reduction in sagebrush cover to meet strategic protection of priority sage-grouse habitat</li> </ul> </li> </ul>	<p><b>DFO ROD/RMP pg. 28</b>  <b>Goal 2</b>                      Restore and maintain desired ecological conditions and fuel loadings through use of prescribed fire, wildland fire use, and other treatment methods.  <b>Actions</b>                      1. Place priority on fuels reduction in wildland urban interface areas. Prioritize treatments by comparing historical fire regimes and current fire severity. Focus management on</p>	<p>No Concern</p> <p>All prescribed fire units are designed to improve habitat conditions and discussed with local FWP biologists to reduce conflicts with wildlife use,</p> <p>Did not paste it here, but also refer to <b>Rangeland</b></p>

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	<p>and conserve habitat quality for the species. Closely evaluate the benefits of the fuel break against the additional loss of sagebrush cover in the EA process.</p> <ul style="list-style-type: none"> <li>○ Apply appropriate seasonal restrictions for implementing fuels management treatments according to the type of seasonal habitats present in a priority area.</li> <li>○ Allow no treatments in known winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and will maintain winter range habitat quality.</li> <li>○ Do not use fire to treat sagebrush in less than 12-inch precipitation zones (e.g., Wyoming big sagebrush or other xeric sagebrush species; Connelly et al. 2000, Hagen et al. 2007, Beck et al. 2009). However, if as a last resort and after all other treatment opportunities have been explored and site specific variables allow, the use of prescribed fire for fuel breaks that would disrupt the fuel continuity across the landscape could be considered, in stands where cheatgrass is a very minor component in the understory (Brown 1982).</li> <li>○ Monitor and control invasive vegetation post-treatment.</li> <li>○ Rest treated areas from grazing for two full growing seasons unless vegetation recovery dictates otherwise (WGFD 2011).</li> <li>○ Require use of native seeds for fuels management treatment based on availability, adaptation (site potential), and probability of success (Richards et al. 1998). Where probability of success or native seed availability is low, non-native seeds may be used as long as they meet sage-grouse habitat</li> </ul>	<p>maintaining fire dependent ecosystems and restoring those outside their natural balance through mechanical, chemical, and prescribed fire treatments.</p> <p>2. Use both prescribed fire and mechanical treatments to treat conifer encroachment in the non-forest habitat types, for aspen restoration and as a post-harvest treatment in timber harvest areas. See the <i>Rangeland Vegetation</i> and <i>Forest and Woodland Vegetation sections for treatment proposals and acres</i>.</p> <p>5. Coordinate all vegetation treatment projects using pre-scribed fire with FWP and adjacent landowners.</p> <p><b>Appendix X pg.207</b>  <b>Conservations measures for Fire Management</b>  <i>Issue: Reduction of sagebrush by prescribed fire.</i></p> <p>1. Sites should not be burned unless:</p> <ul style="list-style-type: none"> <li>a) biological and physical limitations of the site and impact on sage grouse are identified and considered,</li> <li>b) management objectives for the site, including those for wildlife, are clearly defined,</li> <li>c) potential for weed invasion and successional trends are well understood, and</li> <li>d) capability exists to manage the post-burn site properly, including a funded monitoring schedule, to achieve a healthy sagebrush community.</li> </ul> <p>2. Develop local or regional guidelines, such as the Beaverhead-Deer Lodge Forest/FWP guidelines in the intermountain valleys, or consider the following guide-lines if fire is used as a tool elsewhere:</p>	<p><b>Vegetation pg. 51</b>  <b>Actions 4,5,6,7,8,9,12,13</b>  All identify habitat considerations for fire management.</p>

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	<p>objectives (Pyke 2011).</p> <ul style="list-style-type: none"> <li>○ Design post fuels management projects to ensure long term persistence of seeded or pre-treatment native plants. This may require temporary or long-term changes in livestock grazing management, wild horse and burro management, travel management, or other activities to achieve and maintain the desired condition of the fuels management project (Eiswerth and Shonkwiler 2006).</li> <li>● Design fuels management projects in priority sage-grouse habitat to strategically and effectively reduce wildfire threats in the greatest area. This may require fuels treatments implemented in a more linear versus block design (Launchbaugh et al. 2007).</li> </ul> <p>During fuels management project design, consider the utility of using livestock to strategically reduce fine fuels (Diamond et al. 2009), and implement grazing management that will accomplish this objective Davies et al. 2011 and Launchbaugh et al. 2007). Consult with ecologists to minimize impacts to native perennial grasses.</p>	<ul style="list-style-type: none"> <li>a) analyze cumulative effects of sagebrush treatment by considering ecological units, evaluate the degree of fragmentation, and maintain a good representation of mature sagebrush,</li> <li>b) predict effects for the length of time necessary for sagebrush to return to desired condition for determine treatment types and intervals,</li> <li>c) identify suitable patch size based on site-specific characteristics of the natural community and treat patches in a mosaic pattern that provides sagebrush cover for snow capture, hiding cover, and a seed source,</li> <li>d) use available literature to research the effects of fire on sagebrush communities,</li> <li>e) use caution in reducing sagebrush cover in and following drought periods,</li> <li>f) work cooperatively with public agencies, academia, and private landowners to establish conservation objectives for the project area, and</li> <li>g) map all burns within one year of treatment, monitor vegetative response, and develop a GIS layer of burn history.</li> </ul> <p>3. Develop treatments to improve habitats over the long term if sagebrush stands do not meet objectives for sage grouse, such as confining treatments to small patches.</p> <p>4. Consider mechanical treatment as the primary method and prescribed fire as a secondary method to remove conifers that encroach on sage grouse habitat, except where forested habitat is limited.</p>	

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p>5. Avoid treatments to sage grouse habitat in areas that are susceptible to invasion by cheatgrass or other invasive plant species. Treatment will be accompanied by restoration, and reseeded if necessary, to re-establish native vegetation.</p> <p>6. Protect sagebrush along riparian zones, meadows, lakebeds, and farmlands that include important sage grouse habitat:</p> <p>a) winter habitat,                      b) breeding habitat, and                      c) nesting habitat.</p> <p>7. Wash vehicles and heavy equipment for fires prior to arrival at a new location to avoid introduction for noxious weeds.</p> <p><b>Livestock Grazing</b>  <b>Pg 43 Action 16</b>                      16. Rest vegetation treatment areas (e.g., prescribed burns) from livestock grazing up to one year prior to treatment (if necessary) to maintain fine fuels for burning, and for a minimum of two growing seasons following treatment to promote recovery of vegetation. Livestock rest for less than two growing seasons could be justified on a case-by-case basis.</p>	
	<p><b>Fire operations</b></p> <ul style="list-style-type: none"> <li>• In priority sage-grouse habitat areas, prioritize suppression, immediately after life and property, to conserve the habitat.</li> <li>• In general sage-grouse habitat, prioritize suppression where wildfires threaten priority sage-grouse habitat.</li> <li>• Follow Best Management Practices (WO IM 2011-138, see appendix E.)</li> </ul>	<p><b>Appendix X pg.208</b>  <b>Conservations measures for Fire Management</b>  <i>Issue: Reduction of sagebrush by wildfire.</i></p> <p>1. Schedule annual coordination meetings – with appropriate resource staff including fire specialists, wildlife biologists, and range ecologists – to incorporate new sage grouse habitat and other wildlife habitat information needed to set wildfire suppression priorities related to resources. Distribute updates to fire dispatchers for initial attack planning.</p> <p>2. Identify the location of know sage grouse habitat and other wildlife habitats of</p>	<p>No Concern</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p>concern, such as latitude and longitude with a polygon and radius, to avoid disturbance or degradation by temporary facilities, such as fire camps, staging areas, and helibases.</p> <p>3. Incorporate known sage grouse habitat information into each Wildfire Situation Analysis to help determine appropriate suppression plans and prioritize multiple fires.</p> <p>4. Retain unburned areas of sage grouse habitat, such as interior islands and patches between roads and fire perimeter, unless compelling safety, resource protection, or control objectives are at risk.</p>	
	<p><b>Emergency Stabilization and Rehabilitation (ES&amp;R)</b></p> <ul style="list-style-type: none"> <li>• Prioritize native seed allocation for use in sage-grouse habitat in years when preferred native seed is in short supply. This may require reallocation of native seed from ES&amp;R projects outside of priority sage-grouse habitat to those inside it. Use of native plant seeds for ES&amp;R seedings is required based on availability, adaptation (site potential), and probability of success Richards et al. 1998). Where probability of success or native seed availability is low, non-native seeds may be used as long as they meet sage-grouse habitat conservation objectives (Pyke 2011). Re-establishment of appropriate sagebrush species/subspecies and important understory plants, relative to site potential, shall be the highest priority for rehabilitation efforts.</li> <li>• Design post ES&amp;R management to ensure long term persistence of seeded or pre-burn native plants. This may require temporary or long-term changes in livestock grazing, wild horse and burro, and travel management, etc., to achieve and maintain the desired condition of ES&amp;R projects to benefit sage-grouse (Eiswerth and Shonkwiler 2006).</li> <li>• Consider potential changes in climate (Miller et al. 2011)</li> </ul>	<p><b>Goal 3</b> Use rehabilitation to mitigate the adverse effects of fire on the soil, vegetation, and water resources in a cost effective manner.</p> <p><b>Actions</b></p> <ol style="list-style-type: none"> <li>1. Consider if emergency fire rehabilitation is necessary following a wildland fire, depending on the situation.</li> <li>2. If necessary, pursue funding and follow the process outlined in BLM's Emergency Fire Rehabilitation Hand-book (H-1742-1) and Appendix E. Separate environmental analysis will only be completed for emergency fire rehabilitation projects that are outside the scope of activities described in <b>Appendix E</b>.</li> </ol> <p><b>Appendix E. pg. 118</b> Seeding guidelines:</p> <ul style="list-style-type: none"> <li>• Native species will be utilized over nonnative species as appropriate and based on seed availability.</li> <li>• A project inspector will monitor all phases of implementation.</li> <li>• The area to be seeded will be rested from grazing for at least two growing seasons or until vegetation is successfully established. Livestock will</li> </ul>	<p>Climate change is not currently considered for re-seeding under current RMP guidelines</p>



Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
	<p>when proposing post-fire seedings using native plants. Consider seed collections from the warmer component within a species' current range for selection of native seed. (Kramer and Havens 2009).</p>	<p>be excluded by using fencing, closing specific pastures, or closing en-tire allotments.</p> <ul style="list-style-type: none"> <li>• Only native species will be seeded in WSAs.</li> <li>• Monitoring will determine the effectiveness of seeding and to indicate when grazing will resume.</li> <li>• Use only certified weed-free sources and collect seed samples for an All States Noxious Weed Test. Seed nonnatives only in areas of the burn where high erosion or unacceptable vegetation is expected to occur. This may include, but not be limited to, roads, gullies, noxious weed areas, or cheatgrass sites. This will allow refugia for native species where they can reestablish without competition from nonnative species.</li> <li>• If nonnative species are used, a preference should be given to species that are not invasive and can be replaced naturally by native shrubs and grasses. If this is inappropriate or is ineffective, a commitment should be made for long-term secondary restoration of a site following planting of nonnatives.</li> </ul> <p><b>DFO ROD/RMP pg. 29 Monitoring</b>  <i>Goal 2</i>                      Pre-fire condition and post-fire effects will be determined by monitoring vegetative response to treatments and progress towards meeting objectives. Monitoring methods may include fuels and vegetation transects, photo points, density, cover and frequency plots, and ocular estimates. As available, applicable remote sensing data will also be incorporated into ecological condition monitoring. The number of acres in Condition Class 1, 2, and 3 will be re-evaluated during the watershed assessment</p>	

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p>process, and tracked and reported in the Annual Program Summary and Planning Update.</p> <p><i>Goal 3</i> Wildfire rehabilitation effectiveness monitoring studies will be encouraged to determine whether emergency rehabilitation objectives are met. Monitoring requirements and methods will be project specific.</p> <p><b>Appendix X pg.208</b> <i>Issue: Rehabilitation and restoration of sagebrush grass-lands.</i></p> <ol style="list-style-type: none"> <li>1. Assure that long-term wildfire rehabilitation objectives are consistent with the desired natural plant community.</li> <li>2. Re-vegetate burned sites in sage grouse habitat within one year unless natural recovery of the native plant community is expected. Areas disturbed by heavy equipment will be given priority consideration.</li> <li>3. Emphasize native plant species adapted to the site that are readily available and economically and biologically feasible.</li> <li>4. Monitor the site and treat for noxious weeds.</li> <li>5. Allow a minimum of two growing seasons of rest from grazing by domestic livestock unless there are specific restoration objectives using livestock.</li> </ol>	
<p><b>Habitat Restoration</b></p>	<ul style="list-style-type: none"> <li>• Prioritize implementation of restoration projects based on environmental variables that improve chances for project success in areas most likely to benefit sage-grouse (Meinke et al. 2009). <ul style="list-style-type: none"> <li>○ Prioritize restoration in seasonal habitats that are thought to be limiting sage-grouse distribution and/or abundance.</li> </ul> </li> </ul>	<p>WAFWA guidelines are incorporated in Appendix X and include restoration guidelines</p> <p><b>Rangeland Veg pg. 51 Action 14</b> 14. Improve existing seedings that are not meeting range-land health standards for plant vigor and density by implementing grazing management systems or re-seeding with appropriate species of natives or cultivars. Focus restoration of any existing</p>	<p>No seasonal habitats in DFO have been identified as limiting sage grouse distribution. Most if not all habitat that has been tilled or sprayed and seeded on BLM lands in the past has re-established the sagebrush canopy cover .</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		seedings on areas containing high resource values and/or priority habitats and species. Allow the use of all available tools.	
	<ul style="list-style-type: none"> <li>• Include sage-grouse habitat parameters as defined by Connelly et al. (2000), Hagen et al. (2007) or if available, State Sage-Grouse Conservation plans and appropriate local information in habitat restoration objectives. Make meeting these objectives within priority sage-grouse habitat areas the highest restoration priority.</li> </ul>	WAFWA guidelines are incorporated in Appendix X Management Plan and Conservation strategies for sage grouse in MT is also used for sage grouse habitat management	No Concern  This is identified and prioritized during Watershed assessment process
	<ul style="list-style-type: none"> <li>• Require use of native seeds for restoration based on availability, adaptation (ecological site potential), and probability of success (Richards et al. 1998). Where probability of success or adapted seed availability is low, non-native seeds may be used as long as they support sage-grouse habitat objectives (Pyke 2011).</li> </ul>	This is all addressed in responses above under the other resources and conservation measures in Appendix X <b>DFO ROD/RMP</b> <b>Noxious Weeds pg. 49 Action 10</b> 10. Use native species for rehabilitation and reclamation unless site specific evaluations indicate that nonnative species are needed to ensure success or rapid vegetative reestablishment.	No Concern
	<ul style="list-style-type: none"> <li>• Design post restoration management to ensure long term persistence. This could include changes in livestock grazing management, wild horse and burro management and travel management, etc., to achieve and maintain the desired condition of the restoration effort that benefits sage-grouse (Eiswerth and Shonkwiler 2006).</li> </ul>	This is all addressed in responses above under the other resources and conservation measures in Appendix X	No Concern
	<ul style="list-style-type: none"> <li>• Consider potential changes in climate (Miller et al. 2011) when proposing restoration seedings when using native plants. Consider collection from the warmer component of the species current range when selecting native species (Kramer and Havens 2009).</li> </ul>		Climate change not addressed in RMP
	<ul style="list-style-type: none"> <li>• Restore native (or desirable) plants and create landscape patterns which most benefit sage-grouse.</li> </ul>	This is all addressed in responses above	No Concern

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
	<ul style="list-style-type: none"> <li>Make re-establishment of sagebrush cover and desirable understory plants (relative to ecological site potential) the highest priority for restoration efforts.</li> </ul>	<p>This is all addressed in responses above under the other resources and conservation measures in Appendix X</p>	<p>No Concern</p>
	<ul style="list-style-type: none"> <li>In fire prone areas where sagebrush seed is required for sage-grouse habitat restoration, consider establishing seed harvest areas that are managed for seed production (Armstrong 2007) and are a priority for protection from outside disturbances.</li> </ul>	<p><b>Appendix E pg. 118</b>  <b>NATURAL REVEGETATION</b>                      In many cases, successful reestablishment of native species occurs if the perennial plant species are not killed as a result of the fire, or if viable and desirable seed or root mass is present. Generally, in these areas it would be necessary to rest the burned area from livestock grazing for at least two growing seasons. In some situations, the area may be closed to vehicles by issuing a temporary emergency closure. The only rehabilitation that may be necessary is repairing dam-aged fencing and/or construction of temporary fencing around the burned area until the native vegetation is successfully re-established.</p> <p>Seeding guidelines:</p> <ul style="list-style-type: none"> <li>Native species will be utilized over nonnative species as appropriate and based on seed availability.</li> <li>A project inspector will monitor all phases of implementation.</li> <li>The area to be seeded will be rested from grazing for at least two growing seasons or until vegetation is successfully established. Livestock will be excluded by using fencing, closing specific pastures, or closing en-tire allotments.</li> <li>Only native species will be seeded in WSAs.</li> <li>Monitoring will determine the effectiveness of seeding and to indicate when grazing will resume.</li> <li>Use only certified weed-free sources and collect seed samples for an All States Noxious Weed Test. Seed</li> </ul>	<p>No Concern</p>

Topic Area	GSG National Technical Team Report	Consistency Review	Comment/Concern
		<p>nonnatives only in areas of the burn where high erosion or unacceptable vegetation is expected to occur. This may include, but not be limited to, roads, gullies, noxious weed areas, or cheatgrass sites. This will allow refugia for native species where they can re-establish without competition from nonnative species.</p> <ul style="list-style-type: none"> <li>• If nonnative species are used, a preference should be given to species that are not invasive and can be re-placed naturally by native shrubs and grasses. If this is inappropriate or is ineffective, a commitment should be made for long-term secondary restoration of a site following planting of nonnatives.</li> </ul>	

**DONE!!**



**US Department of the Interior  
Bureau of Land Management**

**Greater Sage-Grouse Resource Management Plan  
Amendments and Environmental Impact  
Statements**

**Western Region**

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**CURRENT MANAGEMENT  
JARBIDGE RESOURCE MANAGEMENT PLAN  
(1987)**

**FEBRUARY 2012**

**FOR INTERNAL BLM AND FOREST SERVICE USE ONLY – NOT FOR  
DISTRIBUTION**

## To Western Sage-grouse RMPA/EIS ID Teams:

This document is intended for internal use by the BLM and Forest Service Field Offices for the Greater Sage-Grouse RMPAs/EISs. Current management (No Action alternative) provides a useful baseline for comparison of environmental effects (including cumulative effects) and demonstrates the consequences of not meeting the need for the action. Development of the Greater Sage-Grouse RMPAs/EISs current management will include reviewing and analyzing relevant goals, objectives, and management actions and allocations (descriptions of goals, objectives, and management actions and allocations is provided below) related to sage-grouse/habitat protection in existing BLM and Forest Service land use plans. This process will include documenting those goals, objectives, and management actions and allocations to aid in developing the No Action alternative in the RMPAs/EISs.

**Current Management Matrix** (provided at the end of these instructions). Field Office IDT members should use the current management matrix to capture current management relevant to sage-grouse/habitat protection. The intent is not to repeat the entire ROD for a land use plan, but rather document only the relevant goals, objectives, and management actions and allocations related to sage-grouse/habitat. The matrix includes an exhaustive list of resource and resource use topics that could possibly apply to a planning area/land use plan. However, not all resources/resource uses in the matrix may apply to all existing land use plans. Field Offices need to only provide information for those resources/resource uses that apply to 1) the land use plan under consideration, and 2) the resource/resource use **directly** or **indirectly** related to sage-grouse/habitat management.

## Steps in Documenting Current Management

1. **Column 1 – Current Management: Capture goals, objectives, and management actions and allocations relevant to sage-grouse/habitat protection.** The land use plan decisions establish goals and objectives (desired outcomes) for resources and resource uses and the allowable uses and management actions needed to achieve those goals and objectives. More specifically, desired future conditions or desired outcomes are stated as goals and objectives. Goals are broad statements of desired outcomes (plan-wide and resource or resource-use specific) and generally are not quantifiable or measurable. Objectives are more specifically desired conditions or outcomes to meet the resource/resource use goal.  
  
Management actions and allowable uses are designed to achieve the objectives. Management actions include management measures that will guide future and day-to-day activities. Allowable uses indicate which uses are allowed, restricted, or prohibited, and may include stipulations. Allowable uses also identify lands where specific uses are excluded to protect resource values, or where certain lands are open or closed in response to legislative, regulatory, or policy requirements.
2. **Column 2 – Source Data: Document the source data related to the management action/allocation.** Include the GIS and other data that goal, objective, and management action and allocation is based on.
3. **Column 3 – Preliminary Assessment: Perform preliminary assessment of management action/allocation.** Include results of preliminary analysis (i.e., overlays) to determine status of sage-grouse/habitat protections (Example – FO excludes ROWs of X% of priority habitat).
4. **Column 4 – Management Adequacy: Assess whether goals, objectives, and management actions and allocations are adequate related to sage-grouse/habitat protection.** A “Not Adequate” determination will require an amendment to the land use plan.

<a href="#">Air</a>	<a href="#">Mineral Materials</a>	<a href="#">Vegetation – Rangeland</a>
<a href="#">ACECs</a>	<a href="#">Non-energy Leasables</a>	<a href="#">Vegetation – Riparian</a>
<a href="#">Cave and Karst Resources</a>	<a href="#">Other Administrative Designations</a>	<a href="#">Vegetation – Weeds</a>
<a href="#">Coal</a>	<a href="#">Paleontology</a>	<a href="#">Visual Resources</a>
<a href="#">Comprehensive Trails and Travel Management</a>	<a href="#">Recreation and Visitor Services</a>	<a href="#">Wild and Scenic Rivers</a>
<a href="#">Cultural Resources</a>	<a href="#">Renewable Energy</a>	<a href="#">Wild Horses and Burros</a>
<a href="#">Fisheries &amp; Aquatic Wildlife</a>	<a href="#">Soil &amp; Water</a>	<a href="#">Wilderness and Wilderness Study Areas</a>
<a href="#">Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</a>	<a href="#">Special Status Species – Wildlife</a>	<a href="#">Wilderness Characteristics Outside Existing WSAs</a>
<a href="#">Forestry</a>	<a href="#">Special Status Species – Plants</a>	<a href="#">Wildland Fire Management</a>
<a href="#">Lands and Realty</a>	<a href="#">Support</a>	<a href="#">Wildlife</a>
<a href="#">Livestock Grazing</a>	<a href="#">Vegetation – Forest &amp; Woodlands</a>	
<a href="#">Locatable Minerals</a>	<a href="#">Vegetation – General</a>	

<b>Current Management</b>	<b>Source Data (GIS data requirements/ source related to management action)</b>	<b>Sage-Grouse Relation</b>	<b>Threats</b>	<b>Preli minar y Assess ment</b>	<b>Management Adequacy Y/N (N=need amendment)</b>
<b>Resources</b>					
<b>Air</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Soil &amp; Water</b>					
<b>GOAL:</b> Soils will be managed to maintain productivity and to minimize erosion.		Tertiary	Livestock Impacts		
Objective: Project level planning will consider the level of sensitivity of soil, water and air resources in the affected area on a site specific basis.		Tertiary	Infrastructure		
Action: All construction of management facilities and land treatments will be designed to minimize adverse impacts to the soil, water, and air resources.		Tertiary	Infrastructure		
Action: All areas disturbed during project construction will be reseeded with a mixture of grasses, forbs, and shrubs.		Tertiary	Infrastructure		
Objective: Maintain soil erosion by maintaining good, perennial vegetation cover on all sites.		Tertiary	Livestock Impacts		



Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
Objective: Manage native perennial range to attain good ecological condition.		Secondary	Livestock Impacts		
Objective: Rehabilitated or manipulated sites are considered to be in good condition from a watershed standpoint when at least 75% (by weight) of the sites potential for production is composed of perennial vegetation.		Secondary	Livestock Impacts		
Action: [Insert allowable use #1]					
<b>Vegetation – General</b>					
Listed under Vegetation-Rangeland					
<b>Vegetation – Forest &amp; Woodlands</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Vegetation – Rangeland</b>					
<b>GOAL:</b> The overall objective of the range program is to maintain or improve the soil, vegetation, and watershed conditions within the resource area and to provide forage for livestock, wildlife and wild horses.		Secondary	Livestock Impacts		
Objective: Wildlife habitat will be managed to maintain or increase wildlife numbers over the long term, and the total acres of unsatisfactory crucial habitat will be reduced over the long term.	<i>No maps or GIS data exist to describe wildlife habitat in this plan.</i>	Secondary	Annual Grasslands		
Action: Interseeding and reseeding projects in MUA with objectives to improve ecological condition to benefit wildlife or livestock will use shrub, forb, and grass seed mixture that are normally found in that type of ecological zone/type.		Secondary	Perennial Seeded		
Action: Specific habitat improvement projects will be	Map 11	Tertiary	Annual		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
implemented on 18,200 acres.			Grassland		
Action: No chemical control of sagebrush will be allowed.		Secondary	Contaminants – Pesticide Use		
Action: Priority areas for vegetative treatment include: areas where excessive annual vegetation is causing management problems or economic burdens; areas where unacceptable wildlife habitat condition exists (appropriate seed mixtures for wildlife will be used); areas for overall multiple use improvement using seed mixtures for both wildlife and livestock.		Secondary	Annual Grassland		
Action: [Insert allowable use #1]					
<b>GOAL:</b> Manage all ecological sites on mule deer, pronghorn, elk, bighorn sheep and sage grouse habitat currently in fair or poor ecological condition, for good ecological condition.	<i>No maps or GIS data exist to describe wildlife habitat or ecological condition in this plan.</i>	Primary	Livestock Impacts		
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Vegetation – Riparian</b>					
<b>GOAL:</b> Riparian and wetland habitat will have a high priority for protection and improvement in accordance with national policy.		Secondary	Livestock Impacts		
Objective: Management activities in riparian zones will be designed to maintain or improve riparian habitat condition.		Secondary	Livestock Impacts		
Action: Roads and utility corridors will avoid riparian zones to the extent practicable.		Secondary	Infrastructure		
Action: Design all new spring developments and modify selected existing spring developments to protect wetted areas.		Secondary	Water Development		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
Action: Where possible, and if the need exists for wildlife, fence reservoirs and provide water for livestock away from the reservoirs.	Map 8	Secondary	Livestock Impact		
Objective: Avoid construction activities which remove or destroy riparian vegetation and instream fish cover.		Secondary	Infrastructure		
Action: Provide a riparian buffer zone of sufficient width (100 to 300 feet minimum) to protect riparian vegetation....as determined by an interdisciplinary team of resource specialists, which includes fisheries and wildlife specialists. Buffer zones would generally be used to exclude the following activities: <ul style="list-style-type: none"> <li>• Limit new road construction that parallels streams</li> <li>• Maintain full suppression on wildfires</li> <li>• Spraying of herbicides and pesticides</li> </ul>		Secondary	Infrastructure		
Action: Utilize a 1000 foot (500 feet each side) buffer zone for the total exclusion of the following activities: <ul style="list-style-type: none"> <li>• Oil and gas occupancy and/or surface disturbance</li> <li>• Introduction of chemical toxicants as a result of construction, mining, or agriculture.</li> </ul>		Tertiary	Oil and Gas		
Action: In all cases, allow no proposals that include dewatering of the streambed.		Secondary	Water Development		
Action: All habitat improvement projects in riparian-stream systems will be coordinated and/or reviewed by the Idaho Department of Fish and Game.		Tertiary	Human Disturbance		
<b>Vegetation – Weeds</b>					
<b>GOAL:</b> BLM will control the spread of noxious weeds on public lands where possible, where economically feasible, and to the extent that funds		Secondary	Invasive Plants		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preli minar y Assess ment	Management Adequacy Y/N (N=need amendment)
are prioritized for that purpose.					
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>Fisheries &amp; Aquatic Wildlife</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Wildlife</b>					
Listed under general wildlife section.					
<b>Special Status Species – Wildlife</b>					
<b>Sage-grouse</b>					
<b>GOAL:</b> Protect and enhance endangered, threatened, and sensitive species habitats in order to maintain or enhance existing and potential populations within the planning area.		Secondary	Sagebrush Control		
Objective: Where applicable, “Guidelines for Habitat Protection in Sage Grouse Range” and “Sage Grouse Management Practices” (Technical Bulletin No. 1) – Western States Sage Grouse Committee, June 1974, and 1982 respectively, will be followed.		Primary	Sagebrush Control		
Action: No control work would be allowed where live sagebrush cover is less than 20%.	<i>No maps or GIS data exist to describe 20% sagebrush cover in this plan.</i>	Primary	Sagebrush Control		
Action: Treatment measures should be applied in irregular patterns using topography and other ecological considerations to minimize adverse effects to the sage grouse resource.		Primary	Sagebrush Control		
Action: Where fire is used as a habitat management tool, it should be used in such manner as to result in a mosaic pattern of shrubs in open areas, with openings, optimally from 1 to 10 acres in size.		Secondary	Prescribed Fire		
Action: Maintain the density of sagebrush canopy	<i>No maps or GIS data exist</i>	Primary	Sagebrush		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
coverage at 20-30% within nesting habitats and at least 20% in wintering habitats.	<i>to describe sagebrush cover, nesting or wintering habitats in this plan.</i>		Control		
Action: No control of sagebrush would be considered in any area known to have supported important wintering populations of sage grouse in the past 10 years.	<i>No maps or GIS data exist to describe wintering sage-grouse populations/areas in this plan.</i>	Primary	Sagebrush Control		
Action: Seed mixtures for range improvement projects and fire rehabilitation projects will include a mixture of grasses, forbs, and shrubs that benefit sage grouse.		Primary	Seeded Perennial Grassland		
Action: Improve sage grouse brood rearing habitat where sagebrush canopy cover is greater than 20% by removing sagebrush in small irregular areas and then reseeding.	<i>No maps or GIS data exist to describe sagebrush cover or brood rearing habitats in this plan.</i>	Primary	Sagebrush Control		
Action: Wildlife Habitat Occupancy Restrictions: No occupancy in sage grouse winter range (entire habitat area) from December 1 through February 15.	<i>No maps or GIS data exist to describe sagebrush wintering habitats in this plan.</i>	Primary	Human Disturbance		
Action: Wildlife Habitat Occupancy Restrictions: No occupancy in sage grouse breeding grounds (entire habitat) from February 15 through June 30.	<i>No maps or GIS data exist to describe sage-grouse breeding grounds in this plan.</i>	Primary	Human Disturbance		
Action Wildlife Habitat Occupancy Restrictions: No occupancy in sage grouse nesting/brood rearing habitat within 2 miles radius from a lek from April 15 through June 30.	<i>No maps or GIS data exist to describe sage-grouse nesting/brood rearing habitat or leks in this plan. IDFG has historic lek data.</i>	Primary	Human Disturbance		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
<b>GOAL:</b> Priority for habitat management will be given to habitat for listed and candidate threatened or endangered species and sensitive species.		Secondary	Several: Infrastructure, Livestock Impacts, Human Disturbance, Sagebrush Control, Prescribed Fire		
Objective: [Insert objective #1]					
Action: If any listed or candidate threatened or endangered species may be affected by BLM actions, the Fish and Wildlife Service will be consulted as prescribed by the Endangered Species Act.		Secondary	Several: Infrastructure, Livestock Impacts, Human Disturbance, Sagebrush Control, Prescribed Fire		
Action: [Insert management action #2]					
<b>General Wildlife</b>					
<b>GOAL:</b> Wildlife habitat will be managed to maintain or increase wildlife numbers over the long term, and the total acres of unsatisfactory crucial habitat will be reduced over the long term.	<i>No maps or GIS data exist to describe crucial habitat in this plan.</i>	Secondary	Annual Grassland		
Objective: Localized adverse impacts will be avoided or reduced through interdisciplinary project planning and wildlife input into the development of AMPs and other specific resource plans.		Tertiary	Livestock Impacts		
Action: Existing fences will be modified where specific wildlife needs are not being met. All new fences will be built for wildlife passage.		Secondary	Infrastructure		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
Objective: Wildlife needs will be considered in all vegetation treatment projects. Seed mixtures will contain appropriate mixtures of grasses, forbes, and shrubs to benefit wildlife.		Secondary	Seeded Perennial Grassland		
Action: Forage/cover requirements will be incorporated into allotment management plans and will be specific to areas of primary wildlife use.		Secondary	Livestock Impacts		
Action: Areas disturbed during project construction will be reseeded with a mixture of grasses, forbs and shrubs to meet site specific needs or habitat requirements.		Secondary	Infrastructure		
Action: The Idaho Department of Fish and Game will be consulted one year in advance on all vegetative manipulation projects.		Tertiary	Sagebrush Control		
Objective: Range improvements will be designed to achieve watershed, wildlife, and range objectives.		Secondary	Sagebrush Control		
Action: Wildlife escape devices will be installed on all troughs and tanks.		Tertiary	Water Development		
Action: In crucial wildlife habitats (winter ranges, strutting grounds, etc.) major construction and maintenance work will be scheduled to avoid or minimize disturbance to wildlife.	<i>No maps or GIS data exist to describe wildlife habitat in this plan.</i>	Secondary	Human Disturbance		
Action: Water will be provided in allotments (including rested pastures) during seasonal periods of need for wildlife.		Secondary	Water Development		
<b>GOAL:</b> Limited use class areas' purpose is to delineate public lands where strict environmental controls are required to protect sensitive and significant resources.		Tertiary	Infrastructure		
Objective: First priority for managing a limited use class is to protect and enhance key wildlife habitat, wild horse habitat, scenic values, wilderness, cultural	Map 4	Tertiary	Infrastructure		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
resources, watershed, and other sensitive and significant resources.					
Action: [Insert management action #1]					
<b>Special Status Species – Plants</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Wild Horses and Burros</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Cultural Resources</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Paleontology</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Wildland Fire Management</b>					
<b>GOAL:</b> The present Bureau policy and the Jarbidge RMP proposed action are to aggressively suppress all new fires on or threatening public lands.		Secondary	Wildfire		
Objective: [Insert objective #1]					
Action: [Insert management action #1]					
<b>GOAL:</b> Public lands affected by wildfires will be rehabilitated to accomplish multiple use objectives and designed to reduce fire size.		Secondary	Wildfire		
Objective: [Insert objective #1]					
Action: Rehabilitation of areas, particularly large areas, that have a high potential for fires or have a high frequency of fires, will utilize irregular buffer strips with seed mixtures that are fire resistant and/or meet watershed protection, wildlife and riparian objectives.		Secondary	Wildfire		
Action: In areas where the RMP goal/objective is to		Secondary	Seeded		



Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
return the area to an improved ecological condition, 10 to 25% of the wildfire burn area will use seed mixtures to allow this objective to be met.			Perennial Grassland		
Action: Prescribed burns (proposed) may be reduced, postponed or cancelled in areas where they, in combination with recent burns, would cause significant cumulative impacts to wildlife or watershed conditions.		Secondary	Prescribed Fire		
Action: Seedings will include appropriate seed mixtures to replace wildlife habitat that is burned.		Secondary	Seeded Perennial Grassland		
<b>Wilderness Characteristics Outside Existing WSAs</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Cave and Karst Resources</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Visual Resources</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Resource Uses</b>					
<b>Forestry</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Livestock Grazing</b>					
<b>GOAL:</b> The overall objective of the range program is to maintain or improve the soil, watersheds and vegetation conditions within the resource area and to provide forage for livestock, wildlife, and wild horses.		Tertiary	Livestock Impacts		
Objective: Sufficient vegetation is reserved for purposes of maintaining plant vigor, stabilizing soil, providing cover for wildlife, and other non-consumptive uses.		Secondary	Livestock Impacts		
Action: Establish livestock grazing systems and		Tertiary	Livestock		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
practices that recognize the physiological requirements of forbs and shrubs.			Impacts		
Objective: Proposed stocking rates are designed to provide adequate forage for watershed protection, plant requirements, wildlife, livestock, and other resource uses.		Secondary	Livestock Impacts		
Action: The proposed use of 176,976 AUMs is a target level that will be reached over a period of several years and may be adjusted based on monitoring and evaluation studies.		Tertiary	Livestock Impacts		
Objective: Priority will be given to evaluating the season-of-use on multiple use areas (MUA) 10, 15, and 16. These MUA contain large areas of crucial wildlife habitat. Season of use will be adjusted if necessary to resolve forage conflicts. Priority will be given to crucial habitat areas that are in poor ecological condition.	<i>No maps or GIS data exist to describe crucial wildlife habitat in this plan.</i>	Secondary	Livestock Impacts		
Action: [Insert allowable use #1]					
Objective: Improve lands in poor ecological condition.	<i>No maps or GIS data exist to describe ecological condition in this plan.</i>	Secondary	Livestock Impacts		
Objective: Maintain existing lands that are in good and excellent ecological condition.	<i>No maps or GIS data exist to describe ecological condition in this plan.</i>	Secondary	Livestock Impacts		
Objective: Maintain present levels of upland game bird nesting and cover habitat.	<i>No maps or GIS data exist to describe bird nesting and cover habitat in this plan.</i>	Secondary	Sagebrush Control		
Action: Activity plans will be implemented on an allotment basis and will be designed to achieve		Tertiary	Livestock Impacts		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
the resource objectives identified in each MUA.					
Objective: Maintain current condition of riparian habitat.		Tertiary	Livestock Impacts		
Objective: Improve 40.4 miles of riparian habitat.	Map 8?	Secondary	Livestock Impacts		
Action: Specific management actions to improve riparian habitat will include grazing schedules designed to meet riparian vegetative needs and fencing of riparian pastures to provide maximum control over livestock use.		Secondary	Livestock Impacts		
Action: Fencing of riparian habitat to exclude livestock will occur where other management opportunities do not exist or where other management actions have been implemented and are not successful in achieving the riparian management objective.	Map 8 Riparian/Aquatic Proposed Fencing	Secondary	Livestock Impacts		
<b>Recreation and Visitor Services</b>					
<b>GOAL:</b> BLM will manage recreation on the public lands.		Tertiary	Human Disturbance		
Objective: The Boise District will provide and maintain recreation opportunities and facilities on public lands.		Tertiary	Human Disturbance		
Action: Some areas may be subject to special restrictions to protect resources or eliminate or reduce conflicts among uses.		Secondary	Human Disturbance		
<b>Comprehensive Trails and Travel Management</b>					
<b>GOAL:</b> [Insert goal #1]					
Objective: [Insert objective #1]					
Action: Avoid constructing any roads within or	<i>No maps or GIS data exist</i>	Secondary	Infrastructure		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
closely adjacent to crucial wildlife habitat.	<i>to describe crucial wildlife habitat in this plan.</i>				
<b>Lands and Realty</b>					
<b>GOAL:</b> The RMP identifies 90,366 acres of public land for transfer out of federal ownership.		Tertiary	Urban/Exurban Development, Agricultural Expansion		
Objective: Detailed analysis will be conducted on a case by case basis before decisions are made to transfer these lands through sale, exchange, or through appropriate agricultural entry laws.		Tertiary	Urban/Exurban Development/ Agricultural Expansion		
Action: Land exchanges would not be considered where crucial wildlife habitat would be disposed of unless better crucial wildlife habitat is to be received.	<i>No maps or GIS data exist to describe crucial wildlife habitat in this plan.</i>	Secondary	Urban/Exurban Development, Agricultural Expansion		
Action: Exchanges will not be considered that would dispose of Sikes Act designated wildlife tracts.	<i>No maps or GIS data exist to describe wildlife tracts in this plan.</i>	Tertiary	Agricultural Expansion		
Objective: Exchanges will be weighed against enhancing the Jarbidge Forks Recreation Management Area and wildlife values.	<i>No maps or GIS data exist to describe the Jarbidge Forks RMA in this plan.</i>	Tertiary	Urban/Exurban Development, Agricultural Expansion		
Action: The Idaho Department of Fish and Game will be consulted one year in advance on all proposed land transfers.		Tertiary	Urban/Exurban Development, Agricultural Expansion		
Action: Any public lands where rare, endangered, threatened, or sensitive species of plant or animal are known to live (or nest) would be found unsuitable for disposal, unless mitigation is possible.		Secondary	Urban/Exurban Development, Agricultural Expansion		
Action: Certain tracts of land identified as valuable for wildlife habitat would be found unsuitable for	<i>No maps or GIS data exist to describe wildlife habitat</i>	Tertiary	Agricultural Expansion		

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
disposal. The guidelines and analysis contained in the Environmental Statement (Agricultural Development for Southwest Idaho, February, 1980 Appendix I-1) are used to select the wildlife leave areas.	<i>tracts in this plan.</i>				
<b>West-wide Energy Corridor ROD</b> - Designated energy corridors and adopted interagency operating procedures. Did not find any info related to sage-grouse.	WWEC data can be found at <a href="http://corridoreis.anl.gov/eis/fmap/gis/index.cfm">http://corridoreis.anl.gov/eis/fmap/gis/index.cfm</a>				
<b>Coal</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Fluid Minerals (Oil and Gas, Tar Sands, and Geothermal Resources)</b>					
<b>GOAL:</b> Generally the public lands may be considered for energy and minerals leasing and sale.					
Objective: Approval of an application for lease or sale is subject to an environmental analysis and may include stipulations to protect other resources.		Tertiary	Oil and Gas		
Action: Occupancy for oil and gas activities will be restricted in crucial wildlife habitats as shown in Table I. (see sage-grouse section for occupancy restrictions).	<i>No maps or GIS data exist to describe crucial wildlife habitat in this plan.</i>	Primary	Oil and Gas		
<b>Locatable Minerals</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Mineral Materials</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Non-energy Leasables</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Renewable Energy</b>					
N/A - Did not find any info related to sage-grouse.					
<b>GOAL:</b> The Wind PEIS ROD amended the Jarbidge RMP to include:					

Current Management	Source Data (GIS data requirements/ source related to management action)	Sage-Grouse Relation	Threats	Preliminary Assessment	Management Adequacy Y/N (N=need amendment)
Wind energy development will be restricted from wildlife habitat where adverse effects could not be mitigated. Programmatic policies and BMPs in the Wind Energy Development Program will be adopted.					
<b>Special Designations</b>					
<b>ACECs (Administrative Designations)</b>					
N/A: Designated ACECs are not related to Sage-grouse. ACECs include Sand Point, Bruneau/Jarbidge River, and Salmon Falls Creek.					
<b>Wilderness and Wilderness Study Areas (Administrative Designations)</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Wild and Scenic Rivers</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Other Administrative Designations</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Support</b>					
<b>Interpretation &amp; Environmental Education</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Transportation Facilities</b>					
N/A - Did not find any info related to sage-grouse.					
<b>Health &amp; Safety</b>					
N/A - Did not find any info related to sage-grouse.					

### Approaches/Considerations - Brainstorming/Discussion

- 1) Current Functioning/Non-functioning Habitat in PPH Habitats
  - a. Use vernacular in the Framework report: suitable, marginal, unsuitable
  - b. PPH habitats - management actions for restoration – Current map includes stratification for perennial grassland and conifer encroachment
  - c. Potential for wildfire relative to habitat loss, contribution to sage-grouse habitat requisites, site resiliency, etc.
- 2) Habitat Categories/intensity of management
  - a. Footprint/population
- 3) Habitat Categories/Seasons of Use – Data Availability
  - a. Brood-rearing – some data available
  - b. Lekking – yes
  - c. Winter – generally known - yes
  - d. Connectivity – yes
  - e. Priority habitats broken into 3 categories: functioning, perennial grass, conifer encroachment
  - f. Connectivity with BBD map – could map seasonal habitats as individual layers
  - g. Habitat Quality – Measures of habitat are one component, but needs to include restoration/management of habitats
    - i. Degrees of departure
  - h. Management Zones
    - i. Goals and objectives vary depending on habitat suitability and vegetation condition
    - ii. Functional vs non-functional habitats – suite of management actions depending on category
    - iii. Difficulty in mapping functional and non-functional habitats – scale inferences?
- 4) Precipitation Zones – Lump with #
  - a. Inferences for productivity, management goals and objectives, etc.
- 5) Sage-Grouse Population/sub-populations
  - a. 2006 assessment, management areas within administrative boundaries
- 6) Management Areas – Administration of Management Boundaries
- 7) Local Working Group Boundaries
  - a. Use LWG boundaries as areas relative to management priorities
- 8) Protection vs. Restoration Stratification (cf. #1)
  - a. Stratification of habitats relative to management direction
- 9) WAFWA Management Zones
  - a. Most of ID is MZ 3 with a small portion in MZ 4
  - b. Need to be addressed separately
- 10) Soil/Vegetation
  - a. Restoration/management opportunities, site resiliency, etc.
- 11) Ecoregional/Assessments Delineation
- 12) Key/R1/R2/R3 – Stratification of sagebrush/sage-grouse habitats
  - a. Key habitats – intact for sage-grouse in most seasons
  - b. Restoration areas – perennial grasslands
  - c. R2 – annual grassland
  - d. R3 – conifer

**Idaho Sage-Grouse Meeting**  
**June 25, 2012**  
**Pocatello, ID**

Participants: from sign-up sheet

**Goals and Objectives**

- Goals for Meeting
  - o Develop stratification for sage-grouse habitats with group consensus
  - o Criteria for which stratifications are derived
  - o Recommendation of in a final map and approach
  - o Used as a basis for future discussion by teams in July/August
  - o Submit to Contractor for use in EIS
- Internal ID/MT Alternatives – Range of Alternatives
  - o Stratify sage-grouse PPH map
  - o Management goals, objectives and actions
- Alternatives to Date
  - o No Action - Schroeder map
  - o National Planning Strategy – Guidance in NTT report to PPH
    - Map displays PPH and PGH = occupied habitat
    - Management direction and guidance from NTT – focus on PPH
  - o Alt. B – Conservation Group Alternative
    - Derived from scoping document – Wild Earth Guardians
    - Recommended all PPH described – energy development areas → Nominate as ACEC
    - Map = PPH and PGH combined as priority areas – managed separately
  - o Governor’s Task Force Draft
    - PPH/PGH as base to redefine subsets of habitat/management direction
      - Core habitats – existing development, no new development
      - Important Areas – allow for some new development → focus on existing development areas/corridors
      - PGH – rest of sage-grouse habitats
      - Combination of Core/Important Areas covers 95% BBD map (100%)
    - Totals PPH/PGH habitat among the 3 subsets

**Available Data**

- Information from v. 2 map for PPH/PGH for Idaho and Montana
- Persistence information with currently occupied habitat
  - o 1 km grids cf. Aldredge – 25-65% considered low probability; 65% + persistence – index of landscape (sagebrush)
- Analysis comprised of 3 data layers: lek connectivity, persistence map, BBD (100%) maps to sum up contribution of landscaped
- Assessed relationship to other data sets: recent lek data (2011), known winter and breeding habitats, human footprint analysis, geographic risk map (abiotic map), fire history, roads, etc.
- Cf. Framework document (*A Framework to Identify Greater Sage-grouse Preliminary Priority Habitat and Preliminary General Habitat for Idaho*)



## Approaches – Step Down

- 1) Populations – primary stratification (incorporates MZs)
  - Populations in Sub-region
    - SW MT – telemetry indicates high connectivity – essentially one core population
      - Potential to group with Idaho populations? Management guidance may be similar across state boundaries
    - Weiser
    - East Central ID
    - Snake -Salmon-Beaverhead
    - Northern Great Basin
    - Sawtooth (lump with Snake/Salmon River Population)
    - Bear River (part of WY Basin population) – MZ III
  - USFWS - roll up for populations; contribution of populations to range-wide distribution
- 2) Local Working Groups - second stratification (within population)
  - Provides specific goals and objectives
  - Geographically identifiable
  - Some applicability to sub-population boundaries
  - Means of aggregating information for analysis purposes and management guidance
  - Provides for further stratification of PPH/PGH and importance to population
- 3) PPH/PGH – third stratification (spatial)
  - a. Seasonal and (cf. Habitat Assessment Framework) – described in the document (non-spatial)
  - b. Connectivity Habitats as described in Idaho Framework
- 4) Internal ACEC nominations – fourth stratification

Ed's questions regarding ID-BLM Response to NPT 6/4/14

In preparation for our discussion later today, I wanted to provide you with some of the concerns we would like to go over with you and your team regarding the info memo you sent us on 5/29/14. Hopefully you can provide us with some clarification/rationale on a few inconsistencies with the NPT allocation recommendations.

**For Priority Habitat (Core/Important):**

- 1 What is your rationale for managing medial (important) habitat as a ROW avoidance area, instead of managing it as a ROW exclusion area for wind/solar?
- 2 Idaho is only closing areas to fluid mineral development that are low potential. What is the biological rationale for opening moderate and high potential areas for development? Are you applying NSO to any core (priority) areas?
- 3 Are core and important areas closed to non-energy leasables?
- 4 For mineral materials, what is the rationale for leaving medial (important) areas open? For existing sites, are they subject to the 3% disturbance cap and no net unmitigated loss?

**For General Habitat**

- 5 What is your rationale for not managing general habitat as a ROW avoidance area for solar/wind?
- 6 What is your rationale for not managing general habitat as a ROW avoidance area for high-voltage transmission ROWs?

### **Adaptive Management**

- 7 Is BLM Idaho's adaptive management strategy consistent with the AM sideboards? How does the AM strategy apply to other allocation categories other than ROWs?

### **Disturbance**

- 8 What do you mean when you say that BLM Idaho is “inconsistent with specific biological units.” The NPT guidance allowed the sub-regions to provide for their own unit, as long as information could be aggregated up to the PAC level. Also – you state that the cap is only subject to “seasonal habitats of highest concern” – does this mean that you are not applying the cap to all general and priority (core, important, and general)? Who makes the determination of what is of a “highest concern?”
- 9 Will the no net unmitigated loss be applied to core, important, and general habitat?
- 10 How much medial (important) habitat lies within the PAC boundaries?

### **Cross-Jurisdictional Coordination**

- 11 Are there any inconsistencies with how the Forest Service plans to manage their priority and general habitat areas?
- 12 Have you resolved all of the FWS stop-light matrix concerns (shifting reds to yellows or greens)?

I look forward to our discussion. After we discuss these questions and reconcile these issues, we can confirm that the data you sent to the NOC is ready for the roll-up or you can send any changes in data on to the NOC.



*Brent* → Please stop by  
 Foss, Jeffery <jfoss@blm.gov>  
 JEFF

## Re: Conference Call Prep--re: Response to NPT Guidance

**Roberson, Edwin** <eroberso@blm.gov>

Wed, Jun 4, 2014 at 6:42 AM

To: Timothy Murphy <tmurphy@blm.gov>, Jeffery Foss <jfoss@blm.gov>, Brent Ralston <bralston@blm.gov>

Tim, I had a misstatement in the last line of my email to you all this morning. It should have said: After we discuss these questions and reconcile these issues, we can confirm that the data is ready to send to the NOC for the roll up.,

On Wed, Jun 4, 2014 at 8:35 AM, Roberson, Edwin <eroberso@blm.gov> wrote:

Tim,

In preparation for our discussion later today, I wanted to provide you with some of the concerns we would like to go over with you and your team regarding the info memo you sent us on 5/29/14. Hopefully you can provide us with some clarification/rationale on a few inconsistencies with the NPT allocation recommendations.

### For Priority Habitat (Core/Important):

What is your rationale for managing medial (important) habitat as a ROW avoidance area, instead of managing it as a ROW exclusion area for wind/solar?

Idaho is only closing areas to fluid mineral development that are low potential. What is the biological rationale for opening moderate and high potential areas for development? Are you applying NSO to any core (priority) areas?

Are core and important areas closed to non-energy leasables?

For mineral materials, what is the rationale for leaving medial (important) areas open? For existing sites, are they subject to the 3% disturbance cap and no net unmitigated loss?

### For General Habitat

What is your rationale for not managing general habitat as a ROW avoidance area for solar/wind?

What is your rationale for not managing general habitat as a ROW avoidance area for high-voltage transmission ROWs?

### Adaptive Management

Is BLM Idaho's adaptive management strategy consistent with the AM sideboards? How does the AM strategy apply to other allocation categories other than ROWs?

### Disturbance

What do you mean when you say that BLM Idaho is "inconsistent with specific biological units." The NPT guidance allowed the sub-regions to provide for their own unit, as long as information could be aggregated up to the PAC level. Also – you state that the cap is only subject to "seasonal habitats of highest concern" – does this mean that you are not applying the cap to all general and priority (core, important, and general)? Who makes the determination of what is of a "highest concern?"

Will the no net unmitigated loss be applied to core, important, and general habitat?

How much medial (important) habitat lies within the PAC boundaries?

Cross-Jurisdictional Coordination

Are there any inconsistencies with how the Forest Service plans to manage their priority and general habitat areas?

Have you resolved all of the FWS stop-light matrix concerns (shifting reds to yellows or greens)?

I look forward to our discussion. After we discuss these questions and reconcile these issues, we can confirm that the data you sent to the NOC is ready for the roll-up or you can send any changes in data on to the NOC.  
Thank you. Ed

1 Avoidance Wind & Solar

Protection of Core

Important - Stringent Development Criteria - upward trend in population

No activity buffers around lakes, RDFs, BMPs

Limited Resource for Wind or Solar

\*

2 Interest vs Potential

MT consist with Rocky mtn rest of MT

Illinois m2 II consist with Rocky mtn Co. / Wyoming

NSO is applied to Core & Important

General CSU - Timing restrictions, buffers

3 Yes, all MPLAs are outside Core & Important

~~4~~

4 ~~MTA~~ Same as Wind/Solar under Stringent Development Criteria potential future need

5 95% of habitat is hands off or avoidance with strict criteria  
General limited habitat & limited resource

6 Same as above.

7 Yes, still need to work on broader alternative AM

8 Biological values the ~~same~~ nesting & wintering habitat within Core or Important  
Coordination with state

9 Core No vulnerability loss, mitigation would occur in

10 33% & 200k acres outside PACs

Ed Roberson

Virgil has spoken with Ed

Sally Bitts

Conservation National

Harry Stue

Want an email back

Joe Stue

Develop requirements for anything is important

Matt Magaldi

Development will only occur when I don't affect the birds

PAC plus

Do everything we can to push development outside of PAC  
Final manuals - more than considered

Manual materials - disturbance criteria

Send draft email to Harry, Joe & Steve

General letters, RDPs

How does disturbance relate to PAC

**Brent Ralston**

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**From:** Gardetto, Jessica  
**Sent:** Thursday, August 14, 2014 2:27 PM  
**To:** Brent Ralston  
**Subject:** TPs for Tim  
**Attachments:** Fed\_Fam\_Mtg\_TPs\_8.2014.docx

See if I'm on the right track?

Jessica Gardetto  
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**Why does Idaho have three GRS management zones?**

The three-tiered management zone approach, created in partnership with the state of Idaho, is designed to specifically support an adaptive management strategy and to substantively address wildfire, the primary threat to the species within the Idaho and Montana sub-region.

The Idaho and SW Montana sub-regional plan delineates three sage-grouse management zones – Core, Important and General, to retain and protect sagebrush cover and sage-grouse habitat through appropriate habitat prioritization and protective measures within the most critical habitat zones.

**Core Management Zones:**

- Protect large, continuous sagebrush habitat from anthropogenic disturbance
- Focus on wildfire reduction within these areas
- Two key metapopulations; 65% of the occupied leks and associated seasonal habitats necessary to support 73% of the breeding males
- Compose 66% of the USFWS priority areas for conservation (PAC)
- Extremely limited to further anthropogenic disturbance
- Go beyond the NPT direction by including closures to fluid mineral leasing,
- If an adaptive regulatory hard trigger is engaged in these zones, no further development is permitted
- Soft triggers in these zones can be related to grazing management

**Important Management Zones:**

- Provide protection for habitats adjacent to CMZs
- Encompass 30% of the occupied leks
- Support approximately 22% of the breeding males
- Compose remaining PACs (33%)
- Include additional 750,000 acres that support 4% of the breeding males outside of PACs
- Also include areas beyond those PAC boundaries that would receive threat amelioration management to help foster connectivity and retention of habitat within CMZ and PAC areas.
- Any proposed development in these zones must comply with Anthropogenic Disturbance Development Criteria and would require lek buffers, required design features, and appropriate seasonal or timing restrictions

**General Management Zones:**

- Contain less than 5% of the occupied leks and population
- Represent least intact/least productive habitat

The management zone development restrictions are consistent with the USFWS COT report and its identified PAC areas; they serve to discourage further development in GRS habitat.

**ROW**

Avoidance criteria applies more to ROW areas because BLM Idaho wants to ensure that, if these projects are instituted, sage-grouse habitat is not compromised. All disturbance and associated effects is evaluated with regard to GRS impacts with the same rule set. This eliminates the potential occurrence

where an activity may be approved/not approved while the ROW associated with or supporting the activity would be conversely not approved.

The General Management Zone is not an avoidance area for ROW developments, however, proposals within this zone would still need to conform to the required design features, lek buffers and seasonal restrictions. This maintains a high standard of limiting effects to GRSG and directs potential use away from CMZ and IMZ areas.

### **Other Disturbances**

In the Idaho and Southwestern Montana sub-region, we have expanded ROW avoidance criteria to other large-scale disturbances as well. This ensures that all potential disturbances and their associated effects are evaluated with regard to GRSG impacts using the same rule set and evaluation tools, which avoids inconsistencies in project applications too.

### **Wildland Fire Threats**

BLM Idaho has supported the state of Idaho in the creation of Rangeland Fire Protection Associations (RFPA), which are comprised of ranchers and private land owners in remote, rural areas. RFPA members have been trained to respond to wildfires and to coordinate with federal firefighters, which help keep wildfires in sage-grouse habitat small across both private and public land ownership.

### **Working with Partners**

BLM Idaho's Sage-Grouse planning effort Interdisciplinary Team is comprised of scientists and partners from the Idaho Governor's Office, Idaho Department of Fish and Game, USDA, USDS, and the USFWS. We have shown that, through the need to conserve a species, we can work together across agency and political divides.

We have institutionalized how we monitor rangeland health and sage-grouse habitat across agencies and land ownership; everyone is working on learning how to provide healthy sage-grouse habitat.

BLM has worked with Idaho's numerous sage-grouse working groups throughout the state over the last 10-15 years. For example, the Twin Falls District Fire and Fuels program has partnered with the Natural Resources Conservation Service, Pheasants Forever, Idaho Department of Fish and Game and permittee allotment holders to treat portions of the Burley Field Office encroached by Utah juniper that is affecting sage-grouse habitat

The Idaho and Southwestern Montana Sub-region's key habitat map does not recognize land ownership; it addresses sage-grouse habitat conservation as an intact landscape.

### **Disturbance Threshold**

Our sub-regional plan will limit anthropogenic disturbance to 3% as calculated within the biologically significant unit, (the nesting and wintering habitat within Core and Important Management Zones). This includes all land ownerships for the purpose of evaluation and excludes wildfire disturbance.

New anthropogenic disturbances will not be permitted within Core or Important management zones if the disturbance threshold is already exceeded from any source. A proposed development would not be permitted until enough habitat has been restored to maintain the area under the 3% threshold.

### **Adaptive Management**

There are two different triggers that can be tripped in order to flag the BLM and FS that adjustments must be made within a certain management zone; hard triggers and soft triggers.

Adaptive Regulatory Criteria for soft habitat triggers involves a 10% loss of nesting and/or wintering habitat within a CA/CMZ or IMZ.

Adaptive Regulatory Criteria for hard habitat triggers involves a 20% decline in the maximum number of males counted and a finite rate of change within a CA/CMZ or IMZ.

**Soft Triggers:** Once one of these triggers is activated, Adaptive Regulatory Criteria is initiated, allowing land managers to adjust administration techniques in order to best conserve sagebrush habitat.

**Habitat Triggers:** When a 20% combined loss of nesting and/or wintering habitat occurs within a Conservation Area's CMZ, land managers must adjust their management techniques.

**Brent Ralston**

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**From:** Timothy Murphy  
**Sent:** Friday, August 15, 2014 2:48 PM  
**To:** Brent Ralston; Dennis Mackey  
**Subject:** New Version FFM TPs  
**Attachments:** FFM Talking Points 081514.docx

Note: updated % for population, eg leks and males. Replace former copy.  
Dennis, this is Brent using Tim's pc



National Greater Sage-Grouse  
Idaho & Southwestern Montana Sub Region  
Federal Family Meeting  
August 2014



**1. Why does Idaho need to have three GRSG management zones?**

The Idaho delineates three GRSG management zones – Core, Important and General, to retain and protect sagebrush cover and GRSG habitat (consistent with Wisdom et al. 2011, Aldridge et al. 2008, and Knick et al. 2000) through appropriate prioritization and protective measures within the most critical habitats and across broader habitat areas. Each of these management zones has associated management restrictions and protections for greater sage-grouse (GRSG) and are foundational to the adaptive management strategy.

**Core Management Zones (CMZ)** are delineated to protect large unfragmented, contiguous landscapes from anthropogenic disturbance and to focus wildfire reduction (suppression activities and fuels treatments) associated with the two key metapopulations within the subregion (Garton et al. 2011). These areas encompass 68% of the occupied leks and associated seasonal habitats necessary to support 77% of the breeding males (and by association the entire population) in Idaho. CMZ compose 66% of the USFWS priority areas for conservation (PACs). They have the highest priority for wildfire suppression and minimization activities (fuel breaks and reduction treatments) and have the most restrictive management direction for anthropogenic development which is consistent with the national policy team direction or goes beyond that direction in its protection of GRSG.

**Important Management Zones (IMZ)** are delineated to provide protection to habitats adjacent to the CMZs and encompass 26% of the occupied leks and support approximately 22% of the breeding males (and by association the entire population) in Idaho. IMZ compose the remaining areas of PACs (33%) and in addition include over 750K additional acres supporting 4% of the breeding males outside of PAC areas. The two management zones encompass the FWS identified priority areas for conservation (PAC) and include areas beyond those PAC boundaries that would receive threat amelioration management to help foster connectivity and retention of habitat within CMZ and PAC areas. The IMZ areas provide a management buffer between more intact CMZ areas and General Management Zones with a higher likelihood of wildfire occurrence. The IMZ also has protective and restrictive management supporting the retention and recovery of GRSG habitats in IMZ and CMZ with management direction for anthropogenic development disturbance that is largely consistent with the national policy team direction with several exceptions – solar, wind, non-energy leasable (phosphate) and mineral material developments.

**General Management Zones (GMZ)** contain less than 5% of the occupied leks and population and represent the least intact and least productive habitats for GRSG.

The three management zone approach, unique to Idaho's Plan, was specifically designed in coordination with the State of Idaho to support an adaptive management strategy that substantively addresses the primary threat to the species in Idaho and which could be supported and applicable to non-federal lands within the management zone in coordination with Rural Fire Protection Associations, the development and support of which has garnered Gubernatorial and Congressional support in the State of Idaho.

**2. Why is Solar development not excluded in Important and General Management Zones?**

3. *Why is Wind development not excluded in Important and General Management Zones?*
4. *Why is non-energy leasable development not excluded in Important Management Zones?*
5. *Why is mineral materials development not excluded in Important Management Zones?*

- a. See - *Why does Idaho need to have three GRSG management zones?*
- b. The management zone development restrictions serve to discourage further development in GRSG habitat. The management for the identified uses is consistent with the objectives described in the USFWS COT Report and consistent with the identified PAC areas. The CMZ areas are extremely limited to further anthropogenic disturbance and go beyond the direction provided by the National Policy Team (e.g. closures to fluid mineral leasing and a cessation of further development in the event an adaptive regulatory hard trigger is engaged).
- c. Any proposed development in Important Zones must comply with the Anthropogenic Disturbance Development Criteria (avoidance criteria); if development were to proceed then lek buffers, required design features and appropriate seasonal or timing restrictions would also be applied to limit impacts to GRSG or habitat. In addition mitigation of residual impacts would be required.

AD-4: Core and Important Management Zone: Anthropogenic Disturbance Development Criteria – the following criteria must be met in the screening and assessment process:

- a. The project cannot reasonably be achieved, technically or economically, outside of this management zone; and
- b. The project is co-located within the footprint for existing infrastructure, to the extent practicable. In the event co-location is not practicable, the siting should best reduce cumulative impacts and/or impacts on other high value natural, cultural, or societal resources; and
- c. The project does not result in a net loss of GRSG Key habitat or habitat fragmentation or other impacts causing a decline in the population of the species within the relevant CA; and
- d. The project design mitigates unavoidable impacts through appropriate compensatory mitigation; and
- e. The project complies with the applicable RDFs and BMPs as described in Appendix A.
- f. The project would not exceed the disturbance threshold (AD-1).

6. *Why are high voltage transmission and major pipeline ROW developments not avoided in General Management Zones?*

The GMZ is not identified as an avoidance area for ROW developments; however, proposals within this zone would still need to conform to the required design features, lek buffers and seasonal restrictions which would serve to direct actions away from GRSG habitat (leks specifically) and times that could impact bird behavior. This maintains a high standard of limiting effects to GRSG even within GMZ. This serves to direct potential use away from CMZ and IMZ areas while still minimizing and eliminating impacts to GRSG.

7. *Why is no net unmitigated loss not applied to General Management Zones?*

This has been further refined during the development of the Proposed Plan to include no net unmitigated loss within GMZs as well.

8. *Why does avoidance criteria apply to more than ROWs?*

While many activities or proposals for development are carried out within the purview of ROW permits, others are not, and in some cases proposals involve both actions permitted under a ROW and those permitted under other authorities. In Idaho the ROW avoidance criteria has been expanded to include all large scale anthropogenic disturbance proposals. This effectively accomplishes several objectives:

1. All disturbance and associated effects is evaluated with regard to GRSG impacts with the same rule set (individual proposals may have very different potential impacts – a transmission line versus and oil and gas well – which would be considered in the evaluation of the projects conformance to the criteria.
2. This eliminates the potential occurrence where an activity may be approved/not approved while the ROW associated with or supporting that activity would be conversely not approves/approved, leading to inconsistencies in application.

**9. Lek Buffers**

The plan contains direction to minimize impacts from various impacts and causes. These include minimization measures, buffers around leks and seasonal timing restrictions. The following table delineates specific uses and associated lek buffers.

Program/Use	Buffer
Fluid Minerals Development	2 miles
Solar Development	2 miles
Misc. Anthropogenic Structures	2 miles
Roads	0.8 miles
Industrial Pipelines	0.6 miles
Salable Minerals Developments	0.8 miles
Communication Towers	3 miles
Transmission Lines	600 meters
Organized Recreational Events	2 miles

**10. Disturbance Threshold**

Limit anthropogenic disturbance to 3 percent. This is measured within the nesting and wintering habitat within Core and Important management zones, separately, by Conservation Area. This area is inclusive of all ownerships for evaluation. Anthropogenic disturbance excludes habitat disturbance from wildfire and includes specific activities defined in the Monitoring Strategy. For Idaho this disturbance is measured by direct footprint or by ROW width for linear features (powerlines, pipelines and roads).

If or when the 3% threshold were hit within the nesting and wintering areas of either Core or Important management zones then new anthropogenic disturbances within that Core or Important management zone would not be not be allowed (subject to valid existing rights).

Core and Important Management Zone: Anthropogenic Disturbance Development Criteria – the following criteria must be met in the screening and assessment process:

f. The project would not exceed the disturbance threshold (AD-1).

### ***11. 3 percent disturbance in biologically significant unit for nesting and winter habitat only?***

Nesting and wintering habitats were delineated in Idaho within each of the Conservation Areas to monitor and adaptively manage threats at a biologically meaningful scale. Measuring habitat loss and disturbance within nesting and wintering habitats, as opposed to across the entire Conservation Area or PAC, has several advantages:

- It more accurately reflects methodologies applied in relevant scientific literature (e.g. Knick et al. 2013, Wisdom et al. 2011, Aldridge et al. 2008);
- Provides greater sensitivity for threat response within the large meta-populations;
- Provides a disincentive for development in more critical habitats, while at the same time providing an incentive for proactive maintenance and restoration of those same habitats.

### ***12. Adaptive Management***

The Idaho portion of the plan contains both soft and hard triggers for adaptive management. The triggers are a loss of 10% (soft) or 20% (hard) of either population or habitat when compared to 2001 baseline values.

When any of the Adaptive Regulatory Criteria for Soft Triggers have been met the Implementation Team would evaluate causal factors and recommend additional potential implementation level activities.

When any of the Adaptive Regulatory Criteria for Hard Triggers have been met then CMZ management actions would be applied to the IMZ within that CA.

If an adaptive regulatory trigger is tripped and livestock grazing is identified as a probable limiting factor then adjustments would follow the Adaptive Grazing Management Response.

Remove any adaptive management response when the habitat or population information shows a return to or an exceedance of baseline values within the associated CA.

### ***13. Resource Potentials***

Solar: Extremely low to the point of not addressed in Solar PEIS

Wind: Low with a few areas with higher potential/interest – Cotterell, China Mountain

Oil and Gas: Low in most of Idaho; moderate to high in Bear Lake (se Idaho) and sw Montana

Geothermal: Low in western, northern and eastern part of Idaho and sw Montana; moderate to high in central part of Idaho

Phosphate: high in Known Phosphate Leasing Areas in eastern part of Idaho

### ***14. Protection of PACs***



Core and Important Management Zones encompass all of the PAC areas. Protective management is included for both management zones which meets the COT objectives and affects over 95% of the population in Idaho.

### ***15. State Monitoring Strategy***

The subregional monitoring strategy includes measures and processes to support the evaluation of the adaptive regulatory triggers and anthropogenic disturbance cap. The State of Idaho monitors and tracks population indices and the BLM and Forest Service monitor and track habitat indices.

Implementation of the Habitat Assessment Framework and the broad scale Monitoring Framework are also included as part of the local monitoring strategy.

### ***16. Issues with MT/ID as there are great differences?***

Montana BLM continues to work forward in the development of adaptive management and anthropogenic disturbance approaches applicable to Montana that are also consistent with the yet to be final State of Montana Plan. These will be incorporated into the proposed plan when final.

### ***17. Designated corridors in SE Idaho?***

No final answer on these corridors, their validity and designation is being investigated.

### ***18. Mitigation***

The plan calls for mitigation for any impacts to GRSG and their habitat to a net conservation benefit standard and in addition any key habitat impacted through discretionary actions would be mitigated to a no net loss standard.

### ***19. Map Adjustment***

Between Draft and Final EIS the BLM, Forest Service, US Fish and Wildlife Service and State of Idaho took some time to refine the maps to more accurately reflect on the ground conditions. At the larger scale the original management zone mapping in the preferred alternatives in the Draft identified approximately 11.3 million acres of BLM and Forest Service greater sage-grouse habitat. Based on the refinement there were adjustments between Core, Important and General management zones and removal of non-habitat areas. These non-habitat areas comprised approximately 250k acres leaving approximately 11 million acres designated by BLM or Forest Service as greater sage-grouse habitat.

## Why does Idaho have three GRSG management zones?

The three-tiered management zone approach, created in partnership with the state of Idaho, based on sage-grouse populations and habitat conditions to protect the two key meta-populations in the subregion, is designed to specifically support an adaptive management strategy and to substantively address wildfire, the primary threat to the species within the Idaho and Montana sub-region.

The Idaho and SW Montana sub-regional plan delineates three sage-grouse management zones – Core, Important and General, to retain and protect sagebrush cover and sage-grouse habitat through appropriate habitat prioritization and protective measures within the most critical habitat zones.

### Core Management Zones:

- Protect large, continuous sagebrush habitat from anthropogenic disturbance
- Focus on wildfire reduction within these areas
- Two key metapopulations; 68% of the occupied leks and associated seasonal habitats necessary to support 77% of the breeding males
- Compose 66% of the USFWS priority areas for conservation (PAC)
- Extremely limited to further anthropogenic disturbance
- Go beyond the NPT direction by including closures to fluid mineral leasing,
- If an adaptive regulatory hard trigger is engaged in these zones, no further development is permitted
- Soft triggers in these zones can be related to grazing management

### Important Management Zones:

- Provide protection for habitats adjacent to CMZs
- Encompass 26% of the occupied leks
- Support approximately 20% of the breeding males
- Compose remaining PACs (33%)
- Include additional 750,000 acres that support 4% of the breeding males outside of PACs
- Also include areas beyond those PAC boundaries that would receive threat amelioration management to help foster connectivity and retention of habitat within CMZ and PAC areas.
- Any proposed development in these zones must comply with Anthropogenic Disturbance Development Criteria and would require lek buffers, required design features, and appropriate seasonal or timing restrictions

### General Management Zones:

- Contain less than 5% of the occupied leks and population
- Represent least intact and least productive habitat and the lowest priority for conservation or restoration efforts

The management zone development restrictions are consistent with the USFWS COT report and its identified PAC areas; they serve to discourage further development in GRSG habitat.

## ROW

Avoidance criteria applies more to ROW areas because BLM Idaho wants to ensure that, if these projects

are instituted, sage-grouse habitat is not compromised. All disturbance and associated effects is evaluated with regard to GRSG impacts with the same rule set. This eliminates the potential occurrence where an activity may be approved/not approved while the ROW associated with or supporting the activity would be conversely not approved.

The General Management Zone is not an avoidance area for ROW developments, however, proposals within this zone would still need to conform to the required design features, lek buffers and seasonal restrictions. This maintains a high standard of limiting effects to GRSG and directs potential use away from CMZ and IMZ areas.

### **Other Disturbances**

In the Idaho and Southwestern Montana sub-region, we have expanded ROW avoidance criteria to other large-scale disturbances as well. This ensures that all potential disturbances and their associated effects are evaluated with regard to GRSG impacts using the same rule set and evaluation tools, which avoids inconsistencies in project applications too.

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BLM Idaho has supported the state of Idaho in the creation of Rangeland Fire Protection Associations (RFPA), which are comprised of ranchers and private land owners in remote, rural areas. RFPA members have been trained to respond to wildfires and to coordinate with federal firefighters, which help keep wildfires in sage-grouse habitat small across both private and public land ownership.

### **Working with Partners**

BLM Idaho's Sage-Grouse planning effort Interdisciplinary Team is comprised of scientists and partners from the Idaho Governor's Office, Idaho Department of Fish and Game, USDA, USDS, and the USFWS. We have shown that, through the need to conserve a species, we can work together across agency and political divides.

We have institutionalized how we monitor rangeland health and sage-grouse habitat across agencies and land ownership; everyone is working on learning how to provide healthy sage-grouse habitat.

BLM has worked with Idaho's numerous sage-grouse working groups throughout the state over the last 10-15 years. For example, the Twin Falls District Fire and Fuels program has partnered with the Natural Resources Conservation Service, Pheasants Forever, Idaho Department of Fish and Game and permittee allotment holders to treat portions of the Burley Field Office encroached by Utah juniper that is affecting sage-grouse habitat

The Idaho and Southwestern Montana Sub-region's key habitat map does not recognize land ownership; it addresses sage-grouse habitat conservation as an intact landscape.

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New anthropogenic disturbances will not be permitted within Core or Important management zones if the disturbance threshold is already exceeded from any source. A proposed development would not be permitted until enough habitat has been restored to maintain the area under the 3% threshold.

### **Adaptive Management**

There are two different triggers that can be tripped in order to flag the BLM and FS that adjustments must be made within a certain management zone; hard triggers and soft triggers.

Adaptive Regulatory Criteria for soft habitat triggers involves a 10% loss of nesting and/or wintering habitat within a CA/CMZ or IMZ.

Adaptive Regulatory Criteria for hard habitat triggers involves a 20% decline in the maximum number of males counted and a finite rate of change within a CA/CMZ or IMZ.

**Soft Triggers:** Once one of these triggers is activated, Adaptive Regulatory Criteria is initiated, allowing land managers to adjust administration techniques in order to best conserve sagebrush habitat.

**Habitat Triggers:** When a 20% combined loss of nesting and/or wintering habitat occurs within a Conservation Area's CMZ, land managers must adjust their management techniques.

The Idaho and Southwestern Montana Subregional plan encompasses 18.5 million BLM & Forest Service acres of which 11 million acres provide habitat for Greater Sage-Grouse.

These 11 million acres represent 12 percent of the habitat range-wide and provides habitat for 15 percent of Greater Sage-Grouse range-wide.

The greatest threat to Greater Sage-grouse in the subregion by far is wildfire and invasive species (cheatgrass). All other threats are either insignificant or very site specific in extent.

Anthropogenic disturbance is well below 3% in all sage-grouse areas and potential for solar, wind and oil and gas development is low in most or all of the subregion. Eastern Idaho contains a high potential phosphate resource with designated known phosphate leasing areas.

The Subregional plan designates five (5) Conservation Areas based on relative threats, sage-grouse populations and similar habitat conditions.

The Plan also designates three management zones in Idaho and two in SW Montana, based on sage-grouse populations and habitat conditions to protect the two key meta-populations in the subregion.

These zones are Core, Important and General in Idaho, and Core and General in SW Montana and have been designated to protect sagebrush cover and sage-grouse habitat through habitat prioritization and protective measures within the most critical habitat.

The Conservation Areas and Management Zones have been designated to support the adaptive management strategy and the 3% anthropogenic disturbance threshold.

The Management Zones, adaptive management strategy, disturbance threshold and all other significant components of the plan have been developed in full cooperation and coordination with the State of Idaho, US Fish and Wildlife Service and Forest Service.

The Core and Important Management Zones provide protective management that meets the US Fish and Wildlife Service Conservation Objectives for all priority areas for conservation within the subregion and protects over 95% of the Greater Sage-Grouse population in Idaho.

Core Management Zones encompass 5.2 million acres of BLM and Forest Service sage-grouse habitat and 66% of the priority areas for conservation and protect 68% of the leks and 77% of the population.

Important Management Zones provide protection to an additional 3.1 million acres of BLM and Forest Service sage-grouse habitat, the remaining areas within PACs, including an additional 750 thousand acres outside of PACs and protect 26% of the leks and 20% of the population.

Combined Core and Important Management Zones encompass over 64% of the sage-grouse habitat in the subregion, contains all of the priority areas for conservation and contains over 94% of the leks and 97% of the population in Idaho.

The Adaptive Management Strategy is designed to specifically address the threat of wildfire in the subregion. Core Management Zones are the highest priority for suppression resources during times of multiple starts when resources are not available to address all new fires, and for protection from fuel breaks and other fuels management activities.

The Important Management Zone is the next highest priority for suppression and fuels management activities. In the event that significant portions of populations or habitat are lost (primarily due to fire although other factors could also play a role) the Important Management Zone would then receive the same high priority as Core along with more restrictive measures to address disturbance.

The Adaptive Management Strategy use a soft and a hard trigger to determine management changes based on a 10% (soft trigger) or 20% (hard trigger) change in either populations or habitat.

Engagement of a soft trigger would result in causal factor analysis and an evaluation of implementation level activities with potential adjustments to those activities to reduce or eliminate impacts to sage-grouse.

Engagement of the hard trigger results in a planning scale change in management direction within the Important Management Zone which includes additional priority for wildfire suppression, pre-suppression fuels treatments and limitations on anthropogenic disturbance activities.

Application of the Adaptive Management Strategy is a coordinated effort among BLM, Forest Service, US Fish and Wildlife Service and the States of Idaho and Montana for their respective states.

In Idaho the population component of the Adaptive Management Strategy is monitored and tracked by the state Fish and Game agency, BLM and Forest Service in coordination with the State Fish and Game and Local Sage-Grouse Working Groups track the habitat component. The Office of Species Conservation in the Governor's Office also supports this effort with oversight to be provided to the Idaho Implementation Task Force when it is convened.

The adaptive management strategy is designed to address the largest threat to sage-grouse in the subregion and to sustain viable populations of sage-grouse.

The 3% anthropogenic disturbance threshold is designed to limit development within critical habitats (nesting and wintering habitats). While current disturbance is significantly below 3% and future development is not expected to ever hit this threshold, it is included as a backstop to prevent disturbance beyond this level within Core and Important Management Zones.

The plan also identifies the need to mitigate all impacts to Greater Sage-grouse and that a no net mitigated loss requirement would apply within all management zones.

The Idaho portion of the plan has been coordinated with the Governor of Idaho, the Office of Species Conservation, the Department of Fish and Game, the US Fish and Wildlife Service, and the Forest Service.

The implementation and appropriate functioning of the management direction is reliant on a strong partnership with and continued involvement of the partners involved.

The plan for BLM and Forest Service lands lays a strong foundation for future inclusion of state and potentially private lands through continued efforts of the State of Idaho and Montana.

This coalition of support, management that addresses the primary threats in the subregion, protection provided to over 95% of the sage-grouse population in Idaho and consistency with the US Fish and Wildlife Service Conservation Objective and protection of all the priority areas for conservation, provides a strong foundation to maintain resilient populations in the subregion.

**Brent Ralston**

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**From:** Cooper, Natalie  
**Sent:** Thursday, August 21, 2014 9:38 AM  
**To:** Brent Ralston  
**Cc:** Karen Porter; Kelly Bockting; John Carlson  
**Subject:** Re: FW: Projected Existing Rights.xlsx

So one more question. Designated corridors only right? The numbers that are in the table that you sent, are those for BLM-wide? So we add two other columns, one for Idaho and one for Montana?

\*\*\*\*\*

Natalie Cooper  
BLM Idaho State Office  
Realty Specialist (Rights-of-Way)  
1387 S. Vinnell Way  
Boise, ID. 83709  
(208) 373-3905 office  
(208 373-3974 fax

On Thu, Aug 21, 2014 at 9:14 AM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

Just the corridor measures.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

**From:** Cooper, Natalie [mailto:[ncooper@blm.gov](mailto:ncooper@blm.gov)]  
**Sent:** Thursday, August 21, 2014 8:49 AM  
**To:** Brent Ralston  
**Cc:** Karen Porter; Kelly Bockting; John Carlson  
**Subject:** Re: FW: Projected Existing Rights.xlsx

Hi Brent,

Is there a ROW component to this as well? I only see mineral stuff. Want to make sure I am not missing anything.

natalie

\*\*\*\*\*

Natalie Cooper  
BLM Idaho State Office  
Realty Specialist (Rights-of-Way)  
1387 S. Vinnell Way  
Boise, ID. 83709  
(208) 373-3905 office  
(208 373-3974 fax

On Wed, Aug 20, 2014 at 5:32 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

There have been some questions regarding uses on the ground currently and expected. This is really a general – spitball exercise – for now could you look at the attached table and fill it in for Idaho and Montana (separately) and send back to me. Before noon Thursday would be great. Sorry for the short turnaround, and I appreciate any feedback you can provide me.

Brent Ralston

Greater Sage-Grouse Planning Lead

Idaho and Southwestern Montana Subregion

Idaho State Office

208-373-3812

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**From:** Melvin (Joe) Tague [mailto:[jtague@blm.gov](mailto:jtague@blm.gov)]  
**Sent:** Wednesday, August 20, 2014 3:47 PM  
**To:** Joan Suther; Quincy Bahr; Brent Ralston  
**Subject:** Projected Existing Rights.xlsx



Ted Koch asked that I send you this table. It is a projections of existing or potential development based existing rights.

**ESTIMATES OF AMOUNT OF GRSG HABITAT CURRENT UNDER EXISTING RIGHTS**

<b>FLUID LEASING</b>	OIL & GAS: There are apx. 1,900 oil & gas leases statewide (not all developed yet – leases only). BLM estimates that about 20% of these are in GRSG habitat. Based on Manier et al., (and the BLM Monitoring Framework) which assumes a 5-acre footprint per well, there are about <b>1,900</b> acres of existing rights oil and gas development (0.01% of 17,700 acres total).
<b>GEOHERMAL:</b>	There are 515 geothermal leases statewide (not all developed yet – leases only). BLM estimates 1/3 of these are in GRSG habitat, or about 155 leases. Based on Manier et al. (and the BLM Monitoring Framework) which assumes a 3 acre footprint per site, there are about <b>465</b> acres of existing rights geothermal development (0.003% of 17,700 acres total)
<b>SALABLE MINERALS:</b>	There are 108 pending cases for salable mineral leases. MMS Disposal Sites data 170 sites total <b>23,081</b> acres (0.013% of 17,700 acres Alt G Habitat)
<b>CORRIDORS:</b>	BLM estimates that of the 17.7 million acres, corridors make up 1.22% of GRSG habitat, or approx. <b>216,834</b> acres
<b>LOCATABLES:</b>	The mining claim acres as of 6/16/14 was <b>36,475</b>

REVISED ESTIMATE (07-15-14): 1,900 + 465 + 23,081 + 216,834 + 36,475 = **278,755 acres (or 1.57% of GRSG habitat)**

**Brent Ralston**

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**From:** Porter, Karen  
**Sent:** Thursday, August 21, 2014 3:18 PM  
**To:** Brent Ralston  
**Cc:** Natalie Cooper; Kelly Bockting; John Carlson  
**Subject:** Re: FW: Projected Existing Rights.xlsx  
**Attachments:** Projected Existing Rights\_idaho.xlsx

Brent-

I've got minerals numbers for you for all except mining claims, which Diane is working on providing me. It may take her some time to overlay the claims with habitat to arrive at an acreage, so in the meantime, I'm sending you what I've got so far, since you wanted this several hours ago. The data I've got is for the entire planning area-

On Wed, Aug 20, 2014 at 5:32 PM, Brent Ralston <[bralston@blm.gov](mailto:bralston@blm.gov)> wrote:

There have been some questions regarding uses on the ground currently and expected. This is really a general – spit-ball exercise – for now could you look at the attached table and fill it in for Idaho and Montana (separately) and send back to me. Before noon Thursday would be great. Sorry for the short turnaround, and I appreciate any feedback you can provide me.

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Ted Koch asked that I send you this table. It is a projections of existing or potential development based existing rights.

--

Karen Porter  
Geologist, Program Lead Leasable and Salable Minerals  
BLM Idaho State Office  
Phone (208) 373-3884  
Fax (208) 373-3899

**ESTIMATES OF AMOUNT OF GRSG HABITAT CURRENT UNDER EXISTING RIGHTS**

<b>FLUID LEASING</b>	OIL & GAS: There are currently 57,827 acres of GRSG habitat subject to existing oil & gas leases in the planning area (0.5% of the GRSG habitat). None of the leases are developed.
<b>GEOHERMAL:</b>	GEOHERMAL: There are currently 25,571 acres of GRSG habitat subject to valid existing geothermal leases (0.2% of GRSG habitat). None of the leased lands are currently developed, however drilling is proposed on one lease in the Raft River area of Idaho.
<b>SALABLE MINERALS:</b>	MINERAL MATERIALS: There are approximately 300 existing salable mineral cases subject to valid existing rights in the planning area, approximately half of which are located in GRSG habitat. Assuming an average size of 40 acres per site, it is estimated that approximately 12,000 acres (1%) of GRSG habitat is subject to valid existing rights.
<b>CORRIDORS:</b>	ROW: BLM estimates that of the xx million acres, corridors make up xx% of GRSG habitat, or approx. xx acres (Natalie)
<b>LOCATABLES:</b>	LOCATABLE MINERALS: The acres of GRSG habitat subject to mining claims assumed to be valid is estimated to be approximately

REVISED ESTIMATE (07-15-14): = **xx acres (or xx% of GRSG habitat)**

**From:** [Jerimiah Rieman](#)  
**To:** [Cally Younger](#)  
**Subject:** Fwd: Locatable Minerals and GSG in Wyoming  
**Date:** Tuesday, July 07, 2015 7:42:57 PM  
**Attachments:** [ATT00001.htm](#)  
[2015-1-6 State Regulation of Locatable Minerals.pdf](#)  
[DEQ-IT@wyo.gov\\_20150106\\_181001.pdf](#)  
[ATT00002.htm](#)

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Cally-

See the attached. Call if you have questions.

J

Jerimiah L. Rieman  
Natural Resource Policy Director  
Office of Governor Matthew H. Mead  
State Capitol  
Cheyenne, WY 82002  
307-777-5629  
[jerimiah.rieman@wyo.gov](mailto:jerimiah.rieman@wyo.gov)

Begin forwarded message:

**From:** Jerimiah Rieman <[jerimiah.rieman@wyo.gov](mailto:jerimiah.rieman@wyo.gov)>  
**Date:** June 29, 2015 at 1:06:36 PM MDT  
**To:** "Baker, Tim" <[TBaker@mt.gov](mailto:TBaker@mt.gov)>  
**Subject:** Fwd: Locatable Minerals and GSG in Wyoming

Tim-

See the attached as promised.

J

Jerimiah L. Rieman  
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----- Forwarded message -----

**From:** **Jerimiah Rieman** <[jerimiah.rieman@wyo.gov](mailto:jerimiah.rieman@wyo.gov)>  
**Date:** Tue, Jan 6, 2015 at 5:07 PM  
**Subject:** Locatable Minerals and GSG in Wyoming  
**To:** Sarah Greenberger <[sarah\\_greenberger@ios.doi.gov](mailto:sarah_greenberger@ios.doi.gov)>, Neil Kornze <[NKornze@blm.gov](mailto:NKornze@blm.gov)>, Steven Ellis <[sellis@blm.gov](mailto:sellis@blm.gov)>  
**Cc:** Bob Budd <[bob.budd@wyo.gov](mailto:bob.budd@wyo.gov)>

Sarah, Neil, Steve-

We will be sharing the following information (AG's Office memo concerning state regulation of locatable minerals; DEQ gold permit with reference to GSG) as well as other relevant data with the FWS locally as they work with their regional and national offices concerning locatable minerals and GSG in Wyoming. I wanted to ensure that you have this information as we do that outreach this evening and tomorrow. We are also working on the management actions and maps associated with locatable minerals in the stronghold areas in Wyoming. BLM Wyoming is currently working on that issue with their contractor and solicitors. More to come on both fronts. If you would like to discuss any of this please do not hesitate to contact me.

My best.

Jerimiah

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