From: Bean, Michael
To: Noreen Walsh
Subject: Re: ND Comment letter to BLM for FMT review
Date: Wednesday, January 08, 2014 3:40:29 PM

Thanks again for sending this, Noreen. There is so little BLM surface acreage encompassed by this RMP (30,000 acres) that it is probably much less consequential than any of the other RMPs. That said, I offer two comments:

(1) one of the alternatives (C) includes an ACEC. The FWS comments in the first two paragraphs on page 4 are highly critical of that proposal for BLM's failure to describe the effect of the ACEC designation in more detail. That may be a fair criticism, but the tone of the critique may be so negative as to discourage BLM from pursuing the matter further. For example, where the letter says that "without this discussion [of what an ACEC will do], the Service will not be able to consider the ACEC as an adequate regulatory mechanism," I would suggest instead that the Service tell BLM what it would like to have the ACEC accomplish and conclude that "with this discussion, the Service would be much more likely to be able to consider the ACEC designation as an adequate regulatory mechanism." Knowing Dan's interest in promoting ACEC and similar designations, I think Service comments should be as encouraging of these designations as possible and as helpful to BLM as possible in describing what the Service would like an ACEC to accomplish.

(2) I don't understand the discussion in the last paragraph on page 5 (in particular with respect to "the mitigation effectiveness associated with existing, undeveloped oil and gas leases"). Perhaps I simply haven't read enough of the DEIS to understand the comment, but the paragraph left me scratching my head.

Best wishes.

On Wed, Jan 8, 2014 at 1:06 PM, Noreen Walsh <noreen_walsh@fws.gov> wrote:

> Michael,
> Please note that review is still actively in progress on this letter, it is not complete. I have not reviewed it yet. I'm sending it along prematurely because we are bumping up against the deadline. We will value your thoughts.
> Best,
> Noreen
>
> Noreen Walsh
> Regional Director
> Mountain-Prairie Region
> U. S. Fish and Wildlife Service
>
> Begin forwarded message:
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> > **From:** "Thabault, Michael" <michael_thabault@fws.gov>
> > **Date:** January 8, 2014, 10:11:41 AM MST
> > **To:** FW6 Sage-grouse FMT <fw6_sage-grouse_fmt@fws.gov>

Subject: ND Comment letter to BLM for FMT review

FMT, here is the letter from ND ES to BLM on the BLM plan amendment. Comment period closes the 13th of this month. Please get any feedback to Kevin Shelley and Jeff Towner in ND by COB tomorrow. Thank you.

Michael Thabault
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Mountain Prairie Region
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Michael J. Bean

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