From: Ted_Koch@fws.gov
To: Walsh, Noreen
Cc: Deibert, Pat
Subject: RE: Informal comments on Nevada sage grouse recommendations
Date: Wednesday, October 31, 2012 9:01:35 AM

Noreen-

You got it on the plan.

Leo and others are not inviting us to meet. They've been meeting with BLM to try to generate an alternative for the EIS, and we're not a part of that. I don't have any specific concerns, but I am concerned that the more time they spend generating expectations on their own, or with others and without our input, the more surprises I worry they and others may experience later. I'm wondering if there's a reason they want to keep their distance now, or if this is more a lack of awareness of this pitfall? My experience suggests a lack of awareness.

Thanks,

Ted

Ted Koch
U.S. Fish & Wildlife Service
Nevada State Supervisor
1340 Financial Blvd., Suite 234
Reno, NV 89502-7147
Ted_Koch@fws.gov
775-861-6300

"Think of all the beauty still left around you and be happy" ~ Anne Frank ~

"Walsh, Noreen" <noreen_walsh@fws.gov>

"Walsh, Noreen" <noreen_walsh@fws.gov>
10/31/2012 07:06 AM

To"Koch, Ted" <ted_koch@fws.gov>
cc"Deibert, Pat" <pat_deibert@fws.gov>
SubjectRE: Informal comments on Nevada sage grouse recommendations

Ted, thanks for all the input and sorry to hear you have been ill. I ran out of time to actually call you, but here's what I understand as the most important feedback you would like emphasized to NV:

> No net loss is a great standard, but the rest of the plan doesn't show that will happen (e.g., 5% disturbance is acceptable statewide).
>
> An AMM approach without very specific thresholds as to when disturbance with subsequent mitigation is appropriate will essentially be status quo and will result in continued degradation of GSG status.
>
> While NV is not "responsible" for fire, the plan must acknowledge and account for the likelihood of habitat loss over time due to fire. None of us are held harmless…

Did I miss anything?

Noreen

Noreen Walsh
Deputy Regional Director
Mountain-Prairie Region
U. S. Fish and Wildlife Service

303 236 7920

From: Ted_Koch@fws.gov [mailto:Ted_Koch@fws.gov]
Sent: Tuesday, October 30, 2012 3:48 PM
To: Walsh, Noreen
Subject: RE: Informal comments on Nevada sage grouse recommendations

Noreen-

Okay, thanks. Feel free to call my cell this evening or early tomorrow, too, if you need. 775-313-1910.

Ted

Ted Koch
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Nevada State Supervisor
1340 Financial Blvd., Suite 234
Reno, NV 89502-7147
Ted_Koch@fws.gov
775-861-6300

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"Walsh, Noreen" <noreen_walsh@fws.gov>

"Walsh, Noreen" <noreen_walsh@fws.gov>

10/30/2012 02:21 PM

To
"Koch, Ted" <ted_koch@fws.gov>
cc
"Lohoefener, Ren" <Ren_Lohoefener@fws.gov>, "Fris, Michael" <michael_fris@fws.gov>, "Deibert, Pat" <pat_deibert@fws.gov>, "Werdon, Selena" <selena_werdon@fws.gov>, "Abele, Steve" <steve_abele@fws.gov>
Subject
RE: Informal comments on Nevada sage grouse recommendations

Thanks Ted. I will try to read through this on the break. I have heard about the no net loss vs 5% for a while now, but no change to it, and beyond that I am not sure what major changes you have alerted them are necessary. If you've told me I apologize for my faulty memory. And Leo in my initial conversation roday , seemed to be indicating all systems go, full speed ahead with the framework they have. I just want to echo your concerns in case they have not been heard.

Noreen Walsh
Deputy Regional Director
Mountain-Prairie Region
U. S. Fish and Wildlife Service

303 236 7920

From: Ted_Koch@fws.gov [mailto:Ted_Koch@fws.gov]
Sent: Tuesday, October 30, 2012 3:07 PM
To: Walsh, Noreen
Cc: Lohoefener, Ren; Fris, Michael; Deibert, Pat; Werdon, Selena; Abele, Steve
Subject: Fw: Informal comments on Nevada sage grouse recommendations

Noreen-

I understand you're looking for specific information regarding our opinion of the State of Nevada's sage grouse conservation efforts. Attached are informal comments we shared with Leo Drozdoff and the state on the plan sent to the Governor by his Sage Grouse Advisory Committee.

You should first know that the state and we agree (off the record) that the Committee's "plan" isn't really a plan, but more a set of recommendations, some of which may be in conflict. For example, they identify "no net loss" of sage grouse habitat as a goal, but then suggest that losses up to 5% could occur, and then they would only trigger a review. The state also asks to be "held harmless" regarding effects of fire and invasive species because it's a federal lands issue. My reply has been that we won't blame them, but such an inactive position on the most important threat may not help sage grouse avoid listing under the ESA.

Second, they appear motivated to conserve sage grouse. For example, last week the Governor's staff appealed to the Legislative Joint Interim Finance Committee for $300,000 to get started turning the recommendations into a plan (my words) and implementing it, and the 40ish-member Committee voted unanimously in favor. Leo did a good job there. They also have strong support from mining interests for a conservation banking system for regulating habitat impacts, which appears positive. Also notable; their's is a "Sagebrush Ecosystem" conservation plan because they know other species are at risk. I like that.

If there's one thing you could do, it would be to encourage Leo to engage with us ASAP to start turning the recommendations into a plan. I think he wants to wait until his office/staffing requirements fall into place, but I'd rather not wait that long. I did confirm with him two weeks ago that we want to avoid them publicly asking our approval prematurely because we're definitely not close yet; he said he understood, and they're discussing this issue at the Task Force level. Their willingness to regulate will be the toughest part for them, obviously.

More details included in the attachment. Please call my cell phone today with any questions: 775-313-1910. I'm home recovering from a nasty bug, and feeling much better today.

Thanks,

Ted

Ted Koch
U.S. Fish & Wildlife Service
Nevada State Supervisor
1340 Financial Blvd., Suite 234
Reno, NV 89502-7147
Ted_Koch@fws.gov
775-861-6300

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----- Forwarded by Ted Koch/R8/FWS/DOI on 10/30/2012 01:39 PM -----

Ted Koch/R8/FWS/DOI

09/14/2012 09:23 AM

To
Leo Drozdoff
cc
kemayer@ndow.org, ALueders@blm.gov, bruce.petersen@nv.usda.gov, jmhiggins@fs.fed.us, Michael Fris/SAC/R1/FWS/DOI, Selena_Werdon@fws.gov, "Steve Abele" <steve_abele@fws.gov>, pat_deibert@fws.gov
Subject
Informal comments on Nevada sage grouse recommendations

Leo-

As we discussed, attached are our informal staff comments on the July 31, 2012, "Nevada Strategic Plan for Conservation of Sage Grouse," representing recommendations from the Governor's Sage Grouse Advisory Committee. We hope you find them helpful, and we're happy to discuss them.

Thanks for a productive meeting on the topic earlier this week, too. We are eager to support the state's success in developing and implementing an effective plan for sagebrush ecosystem conservation.

Ted

(See attached file: NV SG recommend comments NFWO.docx)

Ted Koch
U.S. Fish & Wildlife Service
Nevada State Supervisor
1340 Financial Blvd., Suite 234
Reno, NV 89502-7147
Ted_Koch@fws.gov
775-861-6300

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