From: Lohoefener, Ren
To: Noreen Walsh; Richard Hannan
Subject: Re: edited recommendation to BLM
Date: Monday, December 22, 2014 3:55:08 PM
Attachments: FWS DRAFT recommendations 3.docx

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evidently!

according to Amy, state didn't seem to care about the sand and gravel exemption, so that will probably come out.

Ren

On Mon, Dec 22, 2014 at 2:24 PM, Noreen Walsh <noreen_walsh@fws.gov> wrote:

> I think you forgot the attachment
>
> Noreen Walsh
>
> Regional Director
>
> Mountain-Prairie Region
>
> U. S. Fish and Wildlife Service
>
> 303 236 7920
>
> ***The Mountain-Prairie Region of the U. S. Fish and Wildlife Service:*** *We provide conservation stewardship of some of America's most scenic lands, to ensure healthy fish and wildlife for the enjoyment and benefit of all people.*
>
> **From:** Lohoefener, Ren [mailto:ren_lohoefener@fws.gov]
> **Sent:** Monday, December 22, 2014 1:10 PM
> **To:** Noreen Walsh; Richard Hannan
> **Subject:** edited recommendation to BLM
>
> based on our conversation this morning (thank you). If you have edits or comments let me know.
>
> The addition about mineral materials (sand or gravel pits) was to address Nevada's desire that urban growth not be curtailed as a result of not being able to extract construction

materials.

REn

Fish and Wildlife Recommendations for greater sage grouse conservation on BLM land in Nevada

- Attain a long-term net conservation gain (NCG) for greater sage grouse and the habitat essential to the species.
  - NCG must be based on the conservation status of the greater sage grouse as a species or on conservation status of a greater sage grouse population that could be recognized as a discrete population based on habitat (e.g., the Great Basin).
  - NCG determinations should be based on recommendations from a panel of knowledgeable sources (e.g, experts from BLM, FWS, State agencies, USFS, NRCS).

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Based on what we know today, we believe:

- Direct and indirect harm (disturbance, habitat loss) should be
  - avoided in sage-grouse habitat
    - if not avoided, then minimized to the greatest extent possible
    - and mitigated to achieve a NCG
- We believe current science supports no more than 3% direct disturbance (measured by area) to priority conservation area habitat can be allowed and still meet the NCG goal:
  - There can be many types of indirect effects associated with direct effects and indirect effects can vary greatly in magnitude of harm.
  - The 3% direct harm "cap" is intended to also limit the indirect effects so that NCG can be achieved.
  - In Nevada, because of the threats posed by wildfire and invasive plant species, and because loss of habitat can result from hard-rock mining, to maintain the NCG:
    - In Priority Conservation Areas (including Sagebrush Focus Areas):
      - It is important to avoid direct harm from all other anthropogenic causes
      - Avoidance and minimization will be primarily managed using the NPT Guidance Land Use Allocations for Priority Habitat. Local deviations, on a case by case basis, to the guidance may occur (for example, exploitation of mineral materials associated with urban needs) if the NCG standard is maintained.
      - Avoidance will be further managed with a 2% Trigger. If anthropogenic disturbance in these areas exceeds 2% (as measured at the project scale or BSU level) then a 3% disturbance cap will be implemented. Once triggered, an adaptive management team (comprised of BLM, USFS, FWS, and NDOW biologists) will annually evaluate the cap to determine if adjustments need to be made based on new science or changes in habitat availability or condition. Using an adaptive management process, it is possible the disturbance cap could increase if new science finds 3% to be too conservative or if the conservation status of occupied sage grouse habitat improves to an extent where greater disturbance can be accommodated. Any adjustments to the cap must be supported by the best available science and preserve the NCG standard ~~result in a conservation gain~~ for the species.
    - It is important to minimize direct harm from all other anthropogenic causes in General Habitat Areas

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- Where direct and indirect effects cannot be avoided, they should be fully compensated.

- Mitigation of anthropogenic disturbance may be, at BLM's discretion, managed using the NV Conservation Credit System (assuming the questions raised in the recent letter from the Theodore Roosevelt Conservation Partnership, *et al.*, are fully resolved)
- The principles in place for mitigation should be:
    - Attain a NCG
    - Make mitigation on public lands the first priority for impacts on public lands
    - Ensure that proposed compensatory mitigation efforts will be additional and durable
    - Be advised by species and habitat experts from NDOW and USFWS to ensure proposed mitigation has a high likelihood of success
        - Have BLM management as the final decision making authority
    - Incorporate an adaptive management strategy

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