From: James Lyons
To: Amy Lueders
Cc: Ellis Steven
Bcc: noreen_walsh@fws.gov
Subject: Re: Know anything about this?
Date: Thursday, May 21, 2015 2:20:26 PM

Probably. Just thinking that a one-page summary describing the for of the project, the actions to achieve the goal, and a description of how this is consistent with current science is better than having to write pages of legal briefs - to the extent that a summary like that can help lessen the need to do so.

Thanks, Jim

Sent from my iPhone

On May 21, 2015, at 3:59 PM, Amy Lueders <alueders@blm.gov> wrote:

> Yes, and I assume the NEPA analysis does that, but will confirm once I get the BP
>
> Sent from my iPhone
>
> On May 21, 2015, at 3:53 PM, James Lyons <james_lyons@ios.doi.gov> wrote:
>
>> Would be useful if a project like this - at this time - could make clear how the science supports the specific kind of treatments they intend to apply and the specific goals -- from a sage grouse habitat perspective -- they seek to achieve through such treatments. Not meant to be a dissertation defense but simply an explanation of what they intend to accomplish and how the planned treatments will get it done.
>>
>> Thanks, Jim
>>
>> Sent from my iPhone
>>
>> On May 21, 2015, at 2:49 PM, Lueders, Amy <alueders@blm.gov> wrote:
>>
>>> The WWP letter raises rumerous issues so I'll try to walk through a couple of them. On the referenced Vale project, yesterday I asked Jerry Perez to prepare a BP on the specifics of the proposed project- I should get that on Tuesday and can speak to more specific concerns at that time. More broadly, the interim guidance does not prohibit us from moving forward with vegetative treatments, but requires us to pause and consider if

they provide for SG conservation benefits. There is a broad body of work showing the benefits of various types of treatments (such as PJ treatments in encroachment areas) and given the magnitude of the issue of fire and invasives, taking a time out from vegetative treatments is not a benefit to SG and its habitat. In fact, the FWS determination on bi-state was based in part on the commitment to implement the bi-state action plan which consists of a wide variety of vegetative treatment projects that was developed and prioritized in conjunction with the BIstate Technical Team. The RL funding that was recently released by OWF is another example of where we will continue to implement vegetative treatments that benefit sage grouse and its habitat.

Clearly there continues to be new science on the effectiveness of various vegetative treatments on safe grouse and its habitat, and our implementation discussions have focused on how best to ensure we are consistently interpreting and applying new science, in addition to ensuring we have and are implementing a consistent monitoring framework that includes effectiveness monitoring. This will be an integral part of ensuring implementation success.

Once I have the BP from OR I'd be happy to discuss the specifics of that project in more detail. If u would like to further discuss other aspects of the letter, let me know

On Thursday, May 21, 2015, Lyons, James <james_lyons@ios.doi.gov> wrote:

> I am sure this is being done with the best of intentions, but unless it is consistent with our sage grouse conservation effort and the pending plans -- and any interim direction to that effect -- it is likely to draw fire -- no pun intended.
>
> Can you let me know what this project involves. What would you recommend?
>
> As you can see from the attached, suspicions continue to run high. Would be good to minimize the potential for concern until we get the plans in place. Then we can work at trying to build some additional trust. Don't you agree?
>
> Jim
>
> --

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