**From:** DElia, Jesse
**To:** Deibert, Pat
**Cc:** Matt Kales; Mary Grim; Dawn Davis; Michael Thabault
**Subject:** Re: FIRE - Please Review
**Date:** Tuesday, March 03, 2015 2:27:20 PM
**Attachments:** Rewrite with NIFC.10.24.14 edits (1).docx

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Hi Pat,

Found one more round of comments in my e-mail - from Oct 27, 2014

.....

**Deibert, Pat** <pat_deibert@fws.gov>

10/27/14

to Lauren, me, Mary

Hi Lauren -

thanks for the additional look. I passed it through Mary and Jesse again and while improved we still have a few additional comments.

pat

On Mon, Oct 27, 2014 at 12:58 PM, Lauren Mermejo <lmermejo@blm.gov> wrote:

> Pat –
>
> I took your comments and reworked this with NIFC to that it is clean and doesn't repeat, repeat, repeat. We would make this into one Management Action….what do you think?
>
> Thanks for taking a quick look…..if you can get thru it today, that would be great….then I can share it with my Project Leads on my call tomorrow.
>
> Cheers!
>
> Lauren
>
> 2:14 PM (12 minutes ago)

Attachments area
Preview attachment Rewrite with NIFC.10.24.14 edits.docx
Rewrite with NIFC.10.24.14 edits.docx

On Tue, Mar 3, 2015 at 2:14 PM, Deibert, Pat <pat_deibert@fws.gov> wrote:

> Hi everyone -
>
> In response to a comment by Lauren Mermejo on the BLM coordinator call on Monday I went back to my e-mails and found this. We previously provided extensive comments on the fire language - this being the last of them. We did not see any revisions after this (at least not according to my e-mails).
>
> Take home message is that BLM did in part address our concerns, and we did not ask to change the word "allow" at that time. This is post FFM where the word Avoid was in the language (hence Dawn's confusion).
>
> So we need to think about what we want to say tomorrow relative to the word choice. I think our edits on the language are still valid and fill a void. Perhaps we need a short discussion before our call?
>
> Also, we expressly asked the 12 inch precip language be taken out - we wanted the fire efforts to focus on all types of sagebrush. If we allow them to insert the 12 inch clause it weakens fire management in other areas. Thoughts?
>
> pat
> ---------- Forwarded message ----------
> From: **Deibert, Pat** <pat_deibert@fws.gov>
> Date: Thu, Oct 23, 2014 at 1:37 PM
> Subject: Re: FIRE - Please Review
> To: Lauren Mermejo <lmermejo@blm.gov>
>
> Hi Lauren -
>
> Just emerged from our meeting and took a look. Pulled Mary Grim and Jesse D'Elia in as well as they are in my meeting. Our joint comments are attached.
>
> Thanks!
>
> Pat
>
> On Wed, Oct 22, 2014 at 3:46 PM, Lauren Mermejo <lmermejo@blm.gov> wrote:

Hi Patsy –

Hope things are going well…just tried to call you, but your voice mail said that you won't be in until Friday. So….here is why I am e-mailing you….

After the Great Basin FFM, you came up with the latest and greatest Prescribed Fire actions (four bullets).

These were sent to our fire specialists at NIFC to ensure all was kosher with them. I have attached two files – your original language from the FFM, and then the comments and rewrite from NIFC. I don't think that they are substantially different – just more concise and certainly made clearer thru the use of "NEPA analysis that supports the Burn Plan". (see comments)

This is about a 5 or 10 minute review, and I am wondering if you could take a look at the NIFC rewrite and let me know if you are OK with it. The biggest change that I saw was in the 3rd bullet - it now starts in the positive by saying "Allow" instead of "Avoid" and refines it to 'only' later in the sentence. The outcome is the same in my opinion.

Thanks Pat….give me a call if you want to discuss….if need be, we can tie into NIFC as well.

Lauren L. Mermejo

Great Basin GRSG Project Manager

BLM Nevada State Office

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got leks?

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got leks?

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If prescribed fire is used in Greater Sage-Grouse habitat, the NEPA analysis for the Burn Plan will address:

- how Greater Sage-Grouse goals and objectives would be met by its use;
- how the COT Report objectives would be addressed and met;
- why alternative techniques were not selected/ruled out as a viable options;
- a risk assessment to address how potential threats to Greater Sage-Grouse 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 PPMAs (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 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.

**Comment [DP1]:** I thought the NIFC comments said that burn plans don't get to this level of detail and that NEPA will only disclose the range of alternatives on prescribed fire in general, not specific burns. If the NIFC comments are on the mark, how will this level of analysis be implemented?

**Comment [DP2]:** suggest using one or the other (not selected OR ruled out). Its confusing with both.

**Comment [DP3]:** suggest this be the first comment