**From:** Frazer, Gary
**To:** Noreen Walsh
**Cc:** Carrier, Michael; Theresa Rabot; Richard Hannan; Dennis Mackey
**Subject:** Re: GRSG Re: Idaho Sage-Grouse Plan
**Date:** Sunday, March 15, 2015 10:28:25 AM

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Excellent suggestion, but we'll need to do this before 11a EDT. Would it be possible to get the right people engaged that early? I could pop out of Director's staff to do a quick call at 10:30 Eastern.

We can use this conf call number: 866/712-9351, code 476832

Thanks -- GDF

*Gary Frazer*
*Assistant Director -- Ecological Services*
*U.S. Fish and Wildlife Service*
*(202) 208-4646*

On Sun, Mar 15, 2015 at 1:17 PM, Noreen Walsh <noreen_walsh@fws.gov> wrote:

> Hi all, could we consider talking this through first thing tomorrow instead of emailing? That would allow us to bring the primary folks who worked on the strongholds into the conversation.
>
> Noreen Walsh
> Regional Director
> Mountain-Prairie Region
> U. S. Fish and Wildlife Service
>
> On Mar 15, 2015, at 10:48 AM, Frazer, Gary <gary_frazer@fws.gov> wrote:
>
>> Thanks, Mike. Just to confirm and clarify my understanding of the situation, based on Friday's conference call:
>>
>> - Do our ID strongholds include area that was mapped as Important and General under the ID plan framework?
>> - If so, did we consider refining the ID stronghold mapped areas, like was done in NV?
>> - As I recall at the time, we anticipated that there was going to be some tension between the protections that we advocated for the strongholds and the ID plan, but you or your folks thought it could be worked through. Is the reaction we are now experiencing from the State the result of impacts more significant than what we anticipated, or an unwillingness on the part of the State to work through those tensions?
>> - Just to confirm, you and your folks consider the proposed final plan allocations and direction from BLM to be more protective and beneficial for GRSG than the ID plan, correct?

Thanks. I am certain there will be more discussion of this within Interior tomorrow. Your note is very helpful. Best -- GDF

*Gary Frazer*
*Assistant Director -- Ecological Services*
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On Fri, Mar 13, 2015 at 6:43 PM, Carrier, Michael <michael_carrier@fws.gov> wrote:

Gary,

Terry Rabot asked that I provide you with a summary of the elements of the Idaho BLM plan. A summary is attached.

Terry also asked that I give you an idea of what loss of support from the Governor would mean in Idaho should he withhold his support or oppose the plan. First, I will briefly list the four issues about the BLM plan over which the Governor's Office has expressed concern. They are:

- **SFAs:** The overlay of Sagebrush Focal Area designation to include: the FWS map not aligning with what Idaho, working with federal agencies and others, had previously identified as the best habitat; the potential for SFA restrictions to complicate the adaptive management component of the plan; the recommendation for mineral withdrawals; and concerns that some lands identified as SFA are not priority habitat or are non-habitat for grouse.
- **Important Habitat Zone**: Idaho's concern is that merging the Important Habitat with Core Habitat and General Habitat Zones with across-the-board restrictions negates the value of the Important Habitat Zone as a habitat "bank" (which would be added to Core Habitat as losses to habitat or populations occur) thereby undermining Idaho's adaptive management strategy.
- **Additional Restrictions on General Habitat**: Application of the 3.1 mile lek buffer to this relatively small percentage of habitat and population (roughly 5% of GRSG) that would severely restrict activities combined with an exception mechanism that cannot practically be employed.
- **Grazing**: Concerns about the standards as they are implemented.

Absence of support from the Governor for the Plan could translate to:

- Idaho stalling or dropping its continued investment of state funds into creating and supporting Rural Fire Protection Associations which are a key component of BLM's wildland fire protection strategy for grouse habitat;
- As chair of the State Land Board, loss of the Governor's support for adoption of a sage-grouse conservation plan for the Department of State Lands (6% of GRSG habitat);

- Failure to issue planned executive orders to state agencies assigning priority to sage-grouse conservation;
- Loss of the Governor's leadership of private landowners and local governments to cooperate with the federal government on GRSG conservation;
- Potential for the State of Idaho to appeal, litigate or intervene in litigation over agency actions to protect GRSG (as has been experienced with Lepidium).
- Lessened or loss of cooperation from the State of Idaho for federal efforts to conserve other imperiled species and their habitat.

If you have any questions about the above or the attachment, do not hesitate to ask.

Mike

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