From:	Deibert, Pat
To:	Matt Kales
Cc:	Jesse DElia; Mary Grim; Nicole Alt; Michael Thabault
Subject:	grazing
Date:	Tuesday, March 31, 2015 11:39:00 AM
Attachments:	Talking Points Habitat objectives and range pd.docx

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Matt -

I am the only person providing feedback on grazing (Jesse and Mary deferred to me). Here you go!

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got leks?

What Are Habitat Objectives?

- The Habitat Objectives for Greater Sage-Grouse are a list of indicators and values (desired conditions) that describe the seasonal habitat needs of GRSG.
- The BLM commonly assesses conditions for special status species in land health assessments.
- The GRSG indicators are consistent with existing indicators used by the BLM.
- The GRSG "desired conditions" are based on current local and regional GRSG habitat research and data, and have been "personalized" to the planning areas.
- The GRSG habitat objectives are one component of the sage-grouse multi-scale habitat assessment

Comment [DP1]: my understanding is that there is some overlap but not complete. This is particularly true for assessing different types of seasonal habitat (e.g. winter vs. breeding). We need clarification as to what these indicators are.

How Will The Habitat Objectives Be Used for Land Health Assessments?

- The results of the habitat assessment will be used during the land health evaluation to ascertain if the land health standard applicable to sage-grouse habitat (e.g., special status species habitat standard) is being met
- When determining if an area is meeting habitat objectives, the measurements from the area will be assessed based on the range of values for the indicators in the habitat objectives table
- When authorizing activities in sage-grouse habitat, the BLM will consider if habitat objectives are being achieved
- If the habitat objectives are not being achieved, and the site(s) has the potential for achieving these objectives, the BLM will determine the causal factor(s) and make the necessary management adjustments to address the causal factor(s), following current BLM regulations and policy for complying with land health standards.

Comment [DP2]: The type of seasonal habitat must be known for this assessment to be accurate. Please see above comment.

Comment [DP3]: must know type of seasonal habitat.

How Will Habitat Objectives Be Used For Management?

- In SFAs and PHMAs, the NEPA analysis for renewals and modifications of livestock grazing permits/leases will include specific management thresholds based on the GRSG Habitat Objectives Table and Land Health Standards and specific responses to allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA. Hypothetical examples:
    - *For a permit renewal EA, riparian habitat in a few areas is not meeting desired conditions. For Alternative A, modification of the grazing season was applied and included a provision for fencing if proper functioning condition of the riparian area was not met.*
    - *For Alternative A in a new permit, modification of the grazing season was applied and included a provision for temporarily closing all or a portion of a pasture/allotment if perennial grass and forb height of >6 inches was not met.*
- The grazing decision will include management actions that will achieve land health standards. The permit will clearly state that management will be adjusted as outlined in the decision for the specific threshold.
- Thresholds and responses will be determined on a permit-specific basis appropriate for the ecological site, including the ability of the site to meet potential.
- The threshold setting process will be further determined in policy guidance/handbooks.

Comment [DP4]: need to apply an adaptive management strategy to ensure LHS are being met.

Drop In Language From the Plans:

Vegetation Objectives
The ADPPs will establish and incorporate vegetation and GRSG habitat objectives (see Attachment III for specific guidance and a GRSG Habitat Objectives Table template that follows the Sage-Grouse Habitat Assessment Framework Technical Reference-6710-1). The vegetation and GRSG habitat objectives guidance states that the values for the desired conditions in the GRSG Habitat Objectives Table are to be used, at a minimum, to meet the applicable land health standard in sage-grouse habitats. Planning units may include additional indicators and desired condition values as appropriate. The desired condition value for each indicator can be a range of values rather than a single value (e.g., the value for the desired condition for sagebrush canopy cover in breeding and nesting habitat could be 15-25%).

The GRSG Habitat Objectives table is to be placed in the Special Status Species section of the ADPP. The vegetation objective should be placed in the Vegetation section of the ADPP. Planning units will include the following land use plan vegetation objective within the Vegetation section of their ADPPs:

- *In all Sagebrush Focal Areas and Priority Habitat Management Areas, the desired condition is to maintain a minimum of 70% of lands capable of producing sagebrush with 10 to 30% sagebrush canopy cover. The attributes necessary to sustain these habitats are described in Interpreting Indicators of Rangeland Health (BLM Tech Ref 1734-6).*

Comment [DP5]: If speaking only to grazing this works. However, lands capable of producing sagebrush could be significantly reduced by activities that render land incapable of supporting sagebrush, such as fire, cheatgrass invasion, and loss from development. I'm not sure if we ask for a change here given the context, but I would minimally suggest a different wording so that there is an incentive for keeping lands in the capability column.

Livestock Grazing
The following management actions will be included in the Livestock Grazing section of ADPPs.

- *The BLM will prioritize (1) the review of grazing permits/leases, in particular to determine if modification is necessary prior to renewal, and (2) the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) followed by PHMAs outside of the SFAs. In setting workload priorities, precedence will be given to existing permits/leases in these areas not meeting Land Health Standards, with focus on those containing riparian areas, including wet meadows. The BLM may use other criteria for prioritization to respond to urgent natural resource concerns (ex., fire) and legal obligations.*
- *The NEPA analysis for renewals and modifications of livestock grazing permits/leases that include lands within SFAs and PHMAs will include specific management thresholds based on GRSG Habitat Objectives Table and/or Land Health Standards (43 CFR 4180.2) and defined responses that will allow the authorizing officer to make adjustments to livestock grazing without conducting additional NEPA.*
- *Allotments within SFAs, followed by those within PHMAs, and focusing on those containing riparian areas, including wet meadows, will be prioritized for field checks to help ensure compliance with the terms and conditions of the grazing permits. Field checks could include monitoring for actual use, utilization, and use supervision.*
- *At the time a permittee or lessee voluntarily relinquishes a permit or lease, the BLM will consider whether the public lands where that permitted use was authorized should remain available for livestock grazing or be used for other resource management objectives.*

Comment [DP6]: this implies an adaptive management strategy – it should be explicitly stated.