From: DElia, Jesse
To: Carrier, Michael
Cc: Theresa Rabot; Jason Pyron; Kathleen Hendricks; Dennis Mackey; Dawn Davis
Subject: Re: Idaho Department of Lands Sage Grouse Conservation Plan
Date: Monday, March 02, 2015 3:02:57 PM

Very good, thanks Mike for considering these comments and I defer to you on the best way to communicate the implementation piece.

Jesse

On Mon, Mar 2, 2015 at 12:52 PM, Carrier, Michael <michael_carrier@fws.gov> wrote:

> Jesse
> Thanks for your comments. We will incorporate your comments 2. through 5 into the letter. Your first comment has great merit but in the short time we have to get the letter to IDL, we are hesitant to try to offer many specifics as to how IDL should strengthen its plan to confirm certainty of implementation. This is out of concern that such specificity now may trigger an unintended response from IDL to resist our overarching attempt to delay the adoption of this plan and allow us to work with IDL to enhance it. My preference is first to persuade them to postpone. for them to agree to let us work with them, then bring up your five recommended items as necessary to assess reasonable certainty as we work together on a stronger plan.
> Mike
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> On Mon, Mar 2, 2015 at 12:47 PM, DElia, Jesse <jesse_delia@fws.gov> wrote:
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>> Mike,
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>> A couple of recommendations on our comment letter for your consideration:
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>> 1. I recommend be more clear in the introduction, and throughout, regarding what we need from the plan to rely on it as a regulatory mechanism for the purpose of our status review. We use phrases like "we recommend the plan include a commitment" but don't elaborate on the specific pieces of that commitment. For example, I would recommend we point to the implementation criteria in our PECE policy as a general guide for criteria we would consider in assessing the reasonable certainty of such a commitment being implemented: 1. staffing, funding level, funding source, and other resources necessary to implement the effort have been identified; 2. The legal authority and the commitment to proceed are described; 3. the legal procedural requirements necessary to implement the effort are described, 4. authorizations necessary to implement the effort are identified.....8. an implementation schedule for the conservation effort is provided. Recommend we also describe how we will evaluate reasonable certainty of effectiveness.
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>> 2. Our statement in the introduction that "The general conservation measures, outlined in your Plan, may be adequate to protect sage-grouse on many small, scattered IDL parcels" is counter to our argument in the body of the letter. Suggest striking this sentence.
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>> 3. For our buffer recommendation to use the lower end of the interpreted range in the UGSG buffer report - I would recommend we say that this is the minimum we recommend. I think we should specify here that we recommend avoidance of habitat first (even outside of the buffer), and that buffer distances are meant to minimize disturbance where reasonable alternative siting is not feasible - and that all impacts to habitat should

be mitigated.

4. The statement following lek buffers regarding recommending a moratorium until such time that federal land transfers are completed is unclear. Sounds like we would be okay with violating these lek buffer distances once it is transfered - although I don't think that is what is intended. Suggest deleting this sentence.

5. The citation for the ESA is incorrect. Should be 16 U.S.C. 1531 et seq; not 703.

Thanks for the opportunity to comment.

Jesse

On Fri, Feb 27, 2015 at 10:33 AM, Carrier, Michael <michael_carrier@fws.gov> wrote:

The Idaho State Department of Lands has prepared a draft plan for the conservation of greater sage-grouse on State of Idaho endowment lands. These lands contain approximately 6% of sage grouse habitat in Idaho.

The Idaho Fish and Wildlife Office (IFWO) has prepare a draft letter of comment (attached) on the plan (also attached) and welcomes your comments on the letter from the FMT.

Unfortunately, we became aware of the draft plan within the past few days have only had a short time to review and comment on it before Idaho's announced due date of Monday, March 2. As a result, we are asking for **comments on our letter by Noon (MST) March 2**.

I will be sending another email within the next hour that will include maps of "key" areas referenced in our letter.

Please forward your comments on the IFWO letter directly to Dennis_Mackey@fws.gov

Thank You

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Michael Carrier, State Supervisor
Idaho Office, U.S. Fish and Wildlife Service
1387 S. Vinnell Way, Suite 368
Boise, Idaho 83709
(208) 685-6953
(503) 551-6340 (cell)

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Jesse D'Elia, Ph.D.
Candidate Species Conservation Coordinator

Endangered Species Division, Pacific Regional Office
U.S. Fish and Wildlife Service
911 NE 11th Avenue, 4th Floor, Portland, OR 97232
503.231.2349 phone; 503.231.6243 fax
jesse_delia@fws.gov

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Michael Carrier, State Supervisor
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