From: Dillon, Jeffrey
To: Jeff Everett
Subject: Re: Sage-grouse chapter 4 and 5 review
Date: Tuesday, March 31, 2015 2:33:49 PM

Thanks for the info. I'll add this to our comments.

Jeff

basis and would, therefore, not impact permittees/lessees. Candidate Conservation Agreements (CCA) or their successors would be developed and implemented by BLM in cooperation with the U.S. Fish and Wildlife Service (USFWS), and permittees. The Programmatic CCA, signed May 2013, is an agreement between USFWS, the BLM, and the Oregon Cattlemen's Association (OCA) to identify conservation measures that benefit GRSG and to enroll individual livestock grazing allotments under this umbrella agreement. These 10 year agreements are voluntary and would assist in ameliorating threats to GRSG while supporting livestock grazing practices that are beneficial or neutral to GRSG. Monitoring is required. No changes in existing laws, regulations, or policies are needed to implement the CCA.

Candidate Conservation Agreement with Assurances (CCAA) are voluntary agreements between USFWS and private land owners, that leverage beneficial land management practices that further reduce treats across the landscape. The private land owner commits to implement specific conservation measures in exchange for a permit from USFWS which provides assurances that additional conservation measures will not be required and additional land, water, or resource use restrictions under the ESA will not be imposed on them if the species becomes listed in the future after the CCAA is formalized. This landscape-scale, integrated approach to conservation across the mix of land ownerships provides the greatest likelihood that listing will not be necessary, and thus the greatest certainty that additional conservation measures beyond those in the CCA will not be necessary.

Finally, in Chapter 5, under *Relevant Cumulative Actions* on page 5-24, lines 26-33, it states:

- There are a number of Candidate Conservation Agreements (CCAs) and Candidate Conservation Agreements with Assurances (CCAAs) in Oregon. Though none have been implemented, assuming they are signed, these are voluntary agreements whereby landowners agree to manage their lands to remove or reduce threats to GRSG. In CCAAs, landowners receive assurances against additional regulatory requirements should GRSG ever be listed under the ESA. These agreements are expected to enhance conditions for GRSG and improve habitat connectivity.

Here are my thoughts as they stand at the moment:

First, the deleted comment does a much better job of describing the CCA/CCAAs, and should not be deleted. It might actually be better than either of the shorter ones, and could take the place of the first one, pages 4-24.

Next, the paragraph on 5-24 (last one above) is wrong, and contradicts the first one (4-24); the CCAAs are signed and are being implemented as we speak – Harney has been completed for nearly a year. On the private lands side, as of yesterday, there are 100 landowners enrolled between Harney, Lake, Crook, and Malheur representing more than 444,429 acres; this does not include Baker or Grant Counties.

Most importantly – even through some of the districts are not engaging in the CCA, according to the latest information we have from the BLM (1/22/15), there is one completed CCA on 22,499 acres on 1 allotment, with written requests for CCAs on 65 additional allotments representing 1,922,118 acres, and verbal requests for CCAs on an additional 5 allotments covering 34,340 (confirmed and unconfirmed requests). This is dated information and only represents Burns and Prineville districts. It is critically important for the BLM to keep in mind that in most cases the private land CCAAs and the allotment grazers are the same landowners, representing millions of acres of BLM sage-grouse habitat. To dismiss this in the RMP as they have, down to two short paragraphs that contradict each other, is most likely missing a huge effect on the planning area.

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