From: Pyron, Jason
To: Berglund, Jeff
Cc: Matt Kales; Pat Deibert
Subject: Re: FWS comments on SW MT and Lewistown draft plans
Date: Thursday, March 13, 2014 2:39:16 PM
Attachments: Final GRSG EIS Comments IFWO 1_31_14.pdf

Sorry, I thought that you had received these.

Jason

On Thu, Mar 13, 2014 at 7:20 AM, Berglund, Jeff <jeff_berglund@fws.gov> wrote:

> Hi Matt - no worries, the Lewistown comments (and matrix) are attached. I didn't mention during our call yesterday that the Boise FO actually produced the comments on the ID/SW MT EIS - I haven't seen those final comments so I don't have them here. Pat / Jason, can you please send to Matt (and me too)? Thanks!
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> Jeff
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> On Wed, Mar 12, 2014 at 3:55 PM, Matt Kales <matt_kales@fws.gov> wrote:
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>> Jeff,
>>
>> Sorry to bother you (again). I looked on the FWS SG SP site and found our comments on Billings, Hi-line and Miles City. I couldn't find comments on Lewistown and SW MT. Per the below BLM planning table, am I looking for the right items, and if so, can you please forward me our comments on Lewistown and SW MT (Pat and I can then get those up on the SP site if they aren't already). Please pardon any ignorance/confusion on my part. Thanks.
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>> MK

Billings; Pompeys Pillar National Monument	Billings/Pompeys Pillar National Monument RMP/EIS	March 29, 2013	June 28, 2013
HiLine	HiLine RMP/EIS	March 22, 2013	June 20, 2013

Dillon Beaverhead-Deerlodge National Forest	Idaho and Southwestern Montana Sub-Regional Greater Sage-Grouse RMP Amendment/EIS	November 2013	January 29, 2014
Lewistown	Lewistown Greater Sage-Grouse RMP Amendment/EIS	September 2013	
Miles City	Miles City RMP/EIS	March 8, 2013	June 5, 2013

Matt Kales

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January 31, 2014

Memorandum

To: Timothy M. Murphy, Acting Idaho State Director, Bureau of Land Management, Boise, Idaho

To: Nora Rasure, Regional Forester, U.S. Forest Service, Region 4, Ogden, Utah

From: Dennis Mackey, Acting State Supervisor, U.S. Fish and Wildlife Service, Idaho Fish and Wildlife Office, Boise, Idaho

Subject: Comments on the Draft Idaho and Southwestern Montana Sub-regional Greater Sage-grouse Resource Management Plan and Environmental Impact Statement

Thank you for the opportunity to provide comments relative to the subject Draft Land Use Plan (LUP) and Draft Environmental Impact Statement (DEIS). The DEIS describes and analyzes six alternatives (A through F) for managing public lands and resources in the planning area for conservation of Greater Sage-grouse (GRSG). The planning area consists of Bureau of Land Management (BLM) and U.S. Forest Service (FS)-administered lands and minerals in portions of southern and eastern Idaho and southwestern Montana. The specific BLM field offices (FO) and National Forests (NF) included in the planning area are: Bruneau FO, Burley FO, Challis FO, Dillon FO, Four Rivers FO, Jarbidge FO, Owyhee FO, Pocatello FO, Salmon FO, Shoshone FO, Upper Snake FO, Beaverhead-Deerlodge NF, Boise NF, Caribou-Targhee NF, Curlew National Grassland, Salmon-Challis NF, and Sawtooth NF in Idaho.

As a cooperating agency, our comments are provided pursuant to the National Environmental Policy Act (NEPA), 40 Code of Federal Regulations Part 1500-1508, 43 C.F.R. 46.230 and as requested per the March 2012 Memorandum of Understanding between the BLM, the U.S. Fish and Wildlife Service (Service), and the FS. Our comments are pursuant to the Endangered Species Act, of 1973, as amended (16 U.S.C. 1531 *et seq.*), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

The DEIS identifies co-preferred alternatives: the Idaho Southwestern Montana Subregion Alternative D, and the State of Idaho's Alternative E. We look forward to working with BLM to ensure the final EIS (FEIS) reflects a cohesive strategy that is consistent with the February 2013, Conservation Objectives Team Report (COT). As described below, both Alternatives D and E have strengths; however, we have identified some general and specific aspects that need further clarification or refinement.

General Comments

1. Our review is focused on whether Alternative D and/or Alternative E addressed the threats to GRSG as identified in the COT. We recognize that there are differences among the planning efforts of each of the sub-regions, including those which share Idaho and southwestern Montana planning boundaries. We encourage the BLM and FS to resolve any inconsistencies across planning boundaries where these differences do not have a clear basis. Where differences in management are warranted, the rationale for divergent management approaches should be fully explained as they pertain to meeting the COT objectives. It is our understanding that there will be an interagency meeting in February to resolve these and other issues. We look forward to working with our partners toward efficiency and efficacy within and across the four planning units of the Great Basin.

2. We generally support the use of anthropogenic disturbance caps in conjunction with an adaptive management strategy that accounts for GSGR habitat loss and population declines due to both anthropogenic and natural disturbances. If appropriately constructed and implemented such an approach is likely to ensure that GSGR populations remain viable. However, we have some specific concerns regarding the application of this approach and provide the following recommendations and requests for clarification.

   2.1 Disturbance Caps

   a. Alternative D includes a requirement of "no net unmitigated loss of PPMAs" in lieu of a specific anthropogenic disturbance cap (pg. ES-15). The DEIS does not provide adequate specificity regarding how the "no net habitat loss" standard would be implemented to determine its consistency with the COT report or whether it would be a suitable replacement for a disturbance cap. Please provide further clarification of how this approach would be consistent with the COT report.

   b. Alternative E prescribes a 3 percent anthropogenic disturbance cap in the Core Habitat Zone (CHZ) and a 5 percent anthropogenic disturbance cap in the Important Habitat Zone (IHZ). Both of these caps would only apply to fluid mineral development (pg. 2-100). We recommend that a 3 percent disturbance cap be applied to the CHZ and the IHZ and that the cap include other anthropogenic disturbances (for example, Infrastructure as defined by Alternative E, pg D-33).

   c. The available scientific literature discusses several different spatial scales and evaluates different land use activities than those assessed in the DEIS. Therefore, we recommend that you provide a clear analysis and rationale in the DEIS of the methods you will use to calculate disturbance to sage-grouse habitat.

d. Alternative D and Alternative E do not include loss of habitat (i.e., sagebrush cover) due to fire as part of the disturbance cap calculation due to a defined strategy described within each alternative. The Service is striving for consistent application of disturbance caps, but recognizes that there may be differences where a biological justification can be provided because of the variation of impacts to GRSG by threat. We have worked extensively with the FS, BLM and the State of Idaho regarding this issue; GRSG may respond differently to natural versus anthropogenic related habitat disturbance based on the best available information. For example, sage-grouse have a relatively low tolerance to disturbance from anthropogenic features on the landscape (Knick et al. 2013). Both of the preferred alternatives adequately account for the disturbance related impacts of fire within the planning area through incorporation of adaptive management habitat triggers (see 2.2 below). These habitat triggers are based on the findings of Aldridge et al. 2008, Wisdom et al. 2011, and Knick et al. 2013, which breaks out biological tolerance to disturbance impacts by specific activity or threat (i.e., fire, agriculture, and anthropogenic features).

2.2 Adaptive Management

a. Implementation of an adaptive management strategy that includes population and habitat triggers is imperative for achievement of the conservation goals of the COT; particularly in Idaho where the primary threat is wildfire and subsequent invasion of burned areas by invasive grasses. Alternative D and Alternative E both prescribe 'hard' triggers of a 20 percent population or habitat loss. Alternative E also incorporates a 'soft' habitat trigger of a 10 percent population or habitat loss. We recommend that the FEIS include both a hard and a soft trigger. Fire primarily impacts sage-grouse through the direct loss of sagebrush cover. Land cover of sagebrush has been identified through various research methodologies as one of the primary factors affecting the long-term persistence of sage-grouse within a landscape (Walker et al. 2007, Aldridge et al. 2008, Wisdom et al., 2011, Knick et al. 2013). Wisdom et al. (2011) found that "preferably 65% of the landscape needed to be dominated by sagebrush for long-term sage-grouse persistence." Similarly, Aldridge et al. (2008) found that a high probability (>0.9) of long-term sage-grouse persistence required 65% sagebrush cover within a 30.77-km radius scale and Knick et al. (2013) found that "90% of the active leks had at least 40% of the large-scale landscape dominated by sagebrush."

   Both Alternatives D and E have identified population and habitat hard triggers of 20 percent that result in increased protective measures in the affected habitat area when a trigger is tripped. Remediation actions, as a result of a hard trigger (20%), being tripped, that limit or prohibit further development of large scale infrastructure within specified GRSG habitats is a strength of both Alternatives D and E. Inclusion of a soft trigger, as identified in Alternative E, would result in discussion among the state and federal management agencies regarding causal factors and possible remedial actions.
   We believe that inclusion of a soft trigger (10%) in the FEIS would provide increased responsiveness to stochastic threats and additional flexibility for proactive management; both important elements that increase stakeholder participation and early implementation of incentive-based conservation actions.

We recognize that limiting further infrastructure development may not directly address the causal factor for the population or habitat declines. However, the concept of an Implementation Team/Commission, identified in Alternative E but not in Alternative D, is intended for inclusion in both soft and hard triggers to identify the causal factors and effectively implement appropriate secondary actions that are necessary to address the identified threats. We recommend that an Implementation Team/Commission process be included in the FEIS. The process should also include specificity regarding team composition and how science will inform the process and ultimate decision regarding remediation actions.

b. For both of the preferred alternatives, an explanation should be provided for why the identified baseline year was selected for the adaptive management triggers.

3. Lek buffers and noise protective measures are described in Alternatives D and E and are applied across the planning area to help protect GRSG from known threats, including energy development. Specific comments relating to how both of the preferred alternatives implemented these measures to meet the COT objectives are discussed below.

4. Noise and seasonal stipulations should be considerations during the construction and long-term implementation of land use activities. Your proposed implementation of noise and seasonal stipulations across all alternatives appears to be applied only to initial construction activities. However, most land use activities result in permanent disturbances on the landscape and the associated human activity, traffic, and noise disturbances have long-term effects to GRSG. Although the surface area covered by various types of development can be relatively small, the effects of noise extend far beyond the development itself (Blickley and Patricelli 2010). For example, the construction of a compressor station may have short-term implications to GRSG use of seasonal habitats, but the long-term operation and noise of the compressor station may result in GRSG habitat abandonment (Blickley and Patricelli 2012, Blickley et al. 2012). Similarly, seasonal restrictions applied only to drilling and construction do not address effects to populations over long periods of time (Walker et al. 2007).

5. Implementation and effectiveness monitoring are imperative to ensuring a comprehensive adaptive management strategy. Both Alternatives D and E currently lack a clear explanation of how implementation monitoring would be executed (including intervals and standards). Such an explanation is needed for us to fully evaluate the efficacy of the monitoring being proposed.

   Effectiveness monitoring should be clearly correlated with the purpose and need of the DEIS as the results of such will ultimately affect GRSG populations. While both Alternatives D and E would implement population and habitat monitoring, a primary strength of Alternative E is the development of a monitoring and adaptive management strategy that is based upon measurable population objectives within Management Zones and their respective Conservation Areas. These Conservation Areas have also been developed at meaningful scales as they pertain to population and habitat monitoring. For example, Conservation Areas, as defined in Alternative E, would provide an adequate number of lek routes to support associated population monitoring and triggers. Whereas, current monitoring for the

Population Area scale, as defined in Alternative D, would not. In some Population Areas, as described under Alternative D, there are not an adequate number of known or monitored leks to provide a robust sample size to support the associated population triggers, while in other Population Areas, additional lek routes would need to be monitored to adequately inform the triggers. Based on our review of the draft plan, the effectiveness monitoring strategy in Alternative E will result in better long-term conservation of GRSG than that described in Alternative D.

With regard to habitat monitoring, it is currently unclear how habitat change will be monitored within either Alternative D or Alternative E. For example, habitat monitoring discussed in Alternative D (Chapter 2) is significantly different than the Monitoring Framework Plan discussed in Appendix E. While we support the habitat characteristics identified in Alternative E, a more robust description of the habitat monitoring program should be provided.

6. Mitigation is a fundamental component of the conservation strategy proposed in both Alternatives D and E. To meet several conservation objectives within the COT, a "meaningful mitigation" program must be implemented. Both Alternatives D and E contain some essential elements for a comprehensive mitigation strategy, but we need additional details.

   We support the governance structure developed by the Idaho Sage-grouse Advisory Committee incorporated in Alternative E. This structure would provide an integrated framework for mitigation to be incorporated into the adaptive management process for all GRSG habitat categories (e.g., Core, Important, and General). We also encourage the inclusion of the concept of "additionality" and a "net conservation benefit" standard. We encourage close coordination with the State on this mitigation element in order to maintain their important collaborative conservation process.

   We need additional detail for both Alternatives D and E regarding how mitigation will be accomplished in future decision making processes. Further clarity is needed in the following areas:

   a. Methodologies or metrics that will be used to determine expected impacts of actions and conservation measures used to offset them.
   b. Identification of "service areas," or areas where offsets would be focused.
   c. Inclusion of a transparent and accountable monitoring program that includes performance standards that are used to ensure conservation measures meet predetermined goals and objectives.
   d. The role of the land management agency(s) if the Alternative E mitigation program were implemented.

7. As we consider the extent to which conservation measures proposed through LUP amendments (implemented through BLM Management Actions/Best Management Practices, and FS Standards/Guidelines) are consistent with the COT, we will consider the certainty of effective implementation of those measures. It is important that conservation measures

provide adequate specificity to ensure that they will be effectively implemented for GRSG conservation. There are several management actions within both Alternatives D and E that lack the specificity needed to ensure conservation measures are consistent with the COT. For example, management action A-FM-2 (Table 2-18) states "Design fuels management projects in PPMA to strategically and effectively reduce wildfire threats in the greatest area." If not designed and implemented appropriately, fuels management projects as defined above may have adverse impacts, rather than beneficial impacts to GRSG. We look forward to working with your staff to ensure that conservation measures, in the FEIS, have adequate specificity to ensure they meet the COT.

8. Our analysis of the DEIS focused on those impacts associated with GRSG and its habitat for all of the alternatives. We recommend that the impact analysis be improved through the following ways:

    a. We need more clarity as to the extent to which proposed actions within each alternative would ameliorate the threats to GRSG within the identified analysis areas. This is not to suggest that the current conservation measures within the range of alternatives are inadequate, but rather to emphasize the need for a more comprehensive impact analysis. Currently, the analysis demonstrates the extent to which an impact is reduced within a Population Area. However, it should also incorporate the best available science to show how that reduction could ameliorate the associated threat and consequently impact GRSG individuals and populations. The impacts to individuals and associated populations should then be compared across alternatives.
    b. The analysis should consider the beneficial impacts of best management practices and required specific design features where appropriate.
    c. The analysis should address the extent to which conservation measures within the alternatives meet the objectives of the COT. For example, we recommend inclusion of the COT matrix with an associated narrative. We remain committed to providing technical assistance to you and your staff to complete and incorporate this analysis.

9. We hope that through our comments, the BLM and FS will expand the detail of several key components to a level where we can fully evaluate the FEIS pursuant to the COT. Some key components include:

    a. Details on how habitat and disturbance will be monitored;
    b. Methods of landscape-scale prioritization and implementation of step-down assessments for addressing threats from fire and invasive species; and
    c. Details on how mitigation will be applied.

    We are participating on national interagency teams associated with these plan components and will continue to provide input on these components through our membership on these teams. It will be critical that the FEIS provide additional specificity in each of the above areas.

COT Crosswalk Comments

The comments below are a summary of the results of our efforts in comparing Alternative D and Alternative E with the COT.

PACs/Mapping

Inclusion of GRSG habitats that are closely correlated with the PACs is an important element for our consideration of consistency with the COT. As indicated in our April 10, 2013, letter to Governor Otter of Idaho, we determined that the habitats designated within Alternative E (i.e., Core and Important Habitat Zones), are consistent with the COT, as they are closely associated with Idaho's PACs. Priority and Medial Habitat, as mapped in Alternative D, comprise more GRSG habitat than the Core and Important Habitat Zones mapped in Alternative E and are also consistent with the COT. One important difference between Alternatives D and E is that Alternative E's thematic mapping criteria are based upon a measurable population objective. If the BLM considers mapping changes, we recommend that the final map be closely coordinated with the State and reflect scientifically-based population objectives similar to those described in Alternative E. This should include habitats that provide essential connectivity, and habitat restoration and population expansion opportunities.

PACs/Habitat Categorization

We recommend that the habitat categories included in the FEIS be biologically meaningful and pragmatically effective. To be biologically meaningful, the Important Habitat Zone (Alternative E) or Medial Management Area (Alternative D) must represent an adequate portion of Idaho's GRSG population. It is currently unclear how biologically meaningful Alternative D's Medial Habitat Area is, whereas Alternative E's Important Habitat Zone supports 22 percent of Idaho's GRSG population within approximately 4 million acres of habitat. To be pragmatically effective, the habitat categories must include enough land area (i.e., acres) to discourage a habitat or population loss trigger being tripped. The Important Habitat Zone (Alternative E) includes approximately twice as many acres of federal lands as the Medial Habitat Area (Alternative D), therefore we believe that Alternative E's current habitat categorization more effectively discourages a trigger being tripped, and thus is more protective of the species and its habitat because of increased incentive to take early management actions.

Infrastructure

The COT objective is to avoid development of infrastructure within PACs. Alternative D proposes to implement conservation measures that are consistent with the COT. Alternative E proposes to implement conservation measures that are largely consistent with the COT, but includes an exception process for large scale infrastructure development. To be consistent with the COT, Alternative E would need to provide some reasonable certainty that those exceptions will only be granted if they are consistent with the COT. Additionally, Alternative E would need to be modified to ensure that impacts from any exceptions would be avoided, minimized or

mitigated, in that order. We encourage close coordination with the State on this element in order to maintain their important collaborative conservation process.

Fire (including wildfire)

The COT objective is to retain and restore healthy native sagebrush communities. The greatest, and most difficult to manage, threat to long-term persistence of GRSG in the planning area is wildfire and potential for a subsequent invasion of annual grass species. We support the State's ongoing efforts to address this threat by developing a comprehensive wildfire strategy that has included the addition of legislative changes and funding to support the creation of Rural Fire Districts.

We need additional clarity for both Alternative D and E as to site-specific actions to meet the COT objective. Both preferred alternatives have appropriately identified the need to work more extensively at a local scale to coordinate and implement actions that will result in improved wildfire and invasive species management strategies. The step-down assessments, as identified in Alternative D (Appendix K), provide a sound framework upon which to complete these actions. Close coordination of these assessments with the appropriate State agencies and the Service will help ensure that treatment priorities are implemented across jurisdictional boundaries and are consistent with the COT. Inclusion of commitments to implement conservation projects identified in these step-down assessments will be needed to increase our certainty that actions, necessary for GRSG conservation, will occur.

We recommend that the FEIS include provisions to eliminate prescribed burning in sage-grouse wintering and breeding [i.e., lekking, nesting and early brood rearing (Connelly et al. 2004, Connelly et al. 2011)] habitats unless biologically justified. The ecological role of fire in reducing sagebrush canopy and stimulating regeneration may justify the use of prescribed fire in site-specific circumstances (Manier et al. 2013). If prescribed fire is allowed in GRSG habitats, then we recommend that the FEIS commit to using the risk analysis tool currently in development by WAFWA. We also recommend incorporating literature by the Fire and Invasive Species Team (FIST), which is currently developing landscape prioritization for fire and invasive species, as well as step down assessments.

Non-native/Invasive Plant Species

The COT objective is to maintain and restore healthy, native sagebrush communities. Both Alternatives D and E propose to implement similar conservation measures to address this objective. We need additional clarity for both Alternative D and E as to site-specific actions to meet the COT objective. Both preferred alternatives have appropriately identified the need to work more extensively at a local scale to coordinate and implement actions that will result in improved wildfire and invasive species management strategies. As discussed above for fire, inclusion of commitments to implement conservation projects identified in the step-down assessments will be needed to increase our certainty that actions, necessary for GRSG conservation, will occur. The subsequent incursion of invasive nonnative plant species after fire events is extremely difficult to manage. However, as described above for fire, the State has

developed a comprehensive strategy including legislative changes and funding that will directly address fire and the potential subsequent invasion of annual grass species.

Sagebrush Removal

The COT objective is to avoid sagebrush removal or manipulation in sage-grouse breeding or wintering habitats with minor exceptions. Appropriate regulatory and incentive-based mechanisms will be needed to encourage the maintenance of sagebrush. Alternative D proposes conservation measures that directly addresses this and meets the COT objectives. Alternative E does not propose conservation measures that directly address this threat and is currently inconsistent with the COT.

Grazing

The COT objective is to conduct grazing management in a manner consistent with local ecological conditions that maintains or restores healthy sagebrush shrub and native perennial grass and forb communities and conserves the essential habitat components for sage-grouse (e.g., shrub cover, nesting cover). Additionally, the COT recommends restoration of areas which do not currently meet this standard. Both Alternative D and Alternative E provide measures that currently meet the COT objectives for grazing management.

Pinyon-Juniper Expansion

The COT objective is to remove pinyon-juniper from areas of sagebrush that are most likely to support sage-grouse (post removal) at a rate that is at least equal to the rate of pinyon-juniper incursion. Both Alternative D and Alternative E are similar in addressing this threat. We recommend the selected alternative identify a rate at which treatments should be implemented to meet the COT objective. Additionally, removal of pinyon-juniper trees encroaching within 1000 meters of a lek should be the highest priority.

Range Management Structures

The COT objective is to avoid or reduce the impact of range management structures on sage-grouse. Both Alternative D and Alternative E propose to implement conservation measures that meet the COT objective.

Fences

The COT objective is to minimize the impact of fences on GRSG populations. Both Alternative D and Alternative E propose to implement conservation measures that meet the COT objective.

Recreation

The COT objective states that in areas subjected to recreational activities, maintain healthy native sagebrush communities based on local ecological conditions and with consideration of drought conditions, and manage direct and indirect human disturbance (including noise) to avoid

interruption of normal sage grouse behavior. Both Alternative D and Alternative E propose to implement conservation measures that meet the COT objective.

Energy Development

The COT objective states that energy development should be designed to ensure that it will not impinge upon stable or increasing GRSG population trends. As discussed above, large scale infrastructure associated with energy development (e.g., wind, solar, and transmission lines) is avoided within PACs in both Alternatives D and E. The threat of energy development from fluid mineral leasing is naturally limited by a low level of development potential throughout the PACs within the planning area. Alternative E prescribes a 3 percent disturbance cap in the Core Habitat Zone (CHZ), and a 5 percent disturbance cap in the Important Habitat Zone (IHZ), a 0.6 mile NSO lek buffer, and stipulations to minimize impacts from noise. Alternative D prescribes 2 standards, a 3 percent disturbance cap in Priority Habitat as well as a "no net habitat loss" standard. Alternative D also includes an NSO for all GRSG habitats within PACs that have a low potential for development and stipulations to minimize the impacts from noise. The DEIS does not provide adequate specificity regarding how the "no net habitat loss" standard would be implemented to determine its consistency with the COT objective. If it is the intent of Alternative D to implement a 3 percent disturbance cap as well as the above mentioned NSOs and noise stipulations, it would be consistent with the COT objective. Although Alternative E is largely consistent with the COT, we would recommend that the 3 percent disturbance cap be consistently applied across the PACs (CHZ and the IHZ) and that it include other anthropogenic disturbances (as discussed above).

Free-Roaming Equid Management

The COT objective is to protect GRSG from the negative influences of grazing by free roaming equids. Both Alternative D and Alternative E propose to implement conservation measures that meet the COT objective.

Mining

The COT objective is to maintain stable to increasing GRSG populations and no net loss of GRSG habitats in areas affected by mining. Both Alternative D and Alternative E propose to implement conservation measures that meet the COT objective; however, we will need further specificity on mitigation requirements (see general comment on mitigation).

Ex-Urban Development

The COT objective is to limit urban and ex-urban development in GRSG habitats and maintain intact native sagebrush communities. Alternative D proposes conservation measures that directly addresses this and meets the COT objectives. Alternative E does not propose conservation measures that directly address this threat and is currently inconsistent with the COT.

SUMMARY

Long-term conservation of GRSG will depend on a continued commitment to adequately manage threats to the species and its habitat across landscapes and jurisdictional boundaries. Finalization of a strategy that embraces broad stakeholder collaboration across ownership boundaries and is supported by a robust monitoring and adaptive management strategy is critical. We look forward to further coordination with you as you finalize the EIS in a manner that meets the long-term conservation needs of GRSG while being implementable under BLM and FS policies and regulations. Identification of a final decision that is consistent with the objectives of the COT will be imperative to the Service's listing decision in 2015. Thank you again for the opportunity to review and provide comment on the Draft Land Use Plan and DEIS. Please do not hesitate to contact me at 208-378-5267 or Jason Pyron of my staff at 208-685-6958.

cc: USFWS, Region 1, Regional Office, Portland, OR (J. DElia)
USFWS, National GRSG Coordinator, Cheyenne, WY (P. Deibert)
USFWS, State Supervisor, West Valley City, UT (L. Crist)
USFWS, State Supervisor, Reno, NV (T. Koch)
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