**From:** Berglund, Jeff
**To:** Matt Kales
**Cc:** Pat Deibert; Jason Pyron
**Subject:** Re: FWS comments on SW MT and Lewistown draft plans
**Date:** Thursday, March 13, 2014 7:20:51 AM
**Attachments:** 2014_02_18 MEMO Bush_Beyersdorf FWS Comments on Lewistown GSG DRMPA.pdf
FWS GSG RMP Review Matrix 2-18-14-Lewistown All Alts.pdf

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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!

Jeff

On Wed, Mar 12, 2014 at 3:55 PM, Matt Kales <matt_kales@fws.gov> wrote:

> 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.
>
> MK

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

Matt Kales

Special Assistant for Greater Sage-Grouse Conservation

Office of the Regional Director

US Fish and Wildlife Service, Mountain-Prairie Region

Office: (303) 236-4576

Mobile: (720) 234-0257

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Jeff Berglund
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Montana Field Office
585 Shepard Way, Suite 1
Helena, MT 59601
(406) 449-5225, ext. 206

# United States Department of the Interior

## Fish and Wildlife Service

Ecological Services
Montana Field Office
585 Shepard Way, Suite 1
Helena, Montana 59601-6287
Phone: (406) 449-5225 Fax: (406) 449-5339


File: M02 BLM

February 18, 2014

Memorandum

To: Geoff Beyersdorf, Field Manager, Bureau of Land Management, Lewistown Field Office, Lewistown, Montana

From: Jodi Bush, Field Supervisor, U.S. Fish and Wildlife Service, Montana Field Office, Helena, Montana

Subject: Lewistown Field Office Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement

Thank you for the opportunity to provide comments relative to the subject Draft Resource Management Plan Amendment (RMPA) and Environmental Impact Statement (DEIS). The purpose for the RMPA is to identify and incorporate appropriate conservation measures to conserve, enhance and/or restore greater sage-grouse (GSG) habitat by reducing, eliminating, or minimizing threats to that habitat. The DEIS considers and analyzes four alternatives (Alternatives A through D) that address future management of approximately 345,560 acres of Bureau of Land Management (BLM) administered surface and 639,927 acres of federal mineral estate in Chouteau, Fergus, Judith Basin, Meagher, and Petroleum Counties in central Montana administered by the BLM's Lewistown Field Office (LFO). Collectively, the lands that BLM administers (surface and mineral estate) are considered the "decision area." It is our understanding that the RMPA, once finalized, will only apply until the resource management plan (RMP) revision process is complete. This RMP revision process will begin shortly and is anticipated to be complete within approximately 5 years. Consequently, the RMPA plan life is anticipated to be approximately 5 years, although any number of plan components enacted in the RMPA may remain in the RMP through the revision process.

Our comments represent a continuation of a collaborative and iterative process in which we have been engaged with you over the past several months. We appreciate your incorporation of our previous organizational suggestions into the document which facilitated our understanding of proposed actions and made for more efficient review. Due to staff and schedule limitations, we focused our review of the DEIS on GSG issues. Neither our review nor our comments are to be

considered comprehensive; however, we have tried to convey the larger concerns noted while examining the document. We appreciate the level of Service and BLM coordination with respect to the RMPA and other issues and expect that this will continue through production of the Final EIS (FEIS), including section 7 consultation under the ESA. It should also be noted that our verbal and written comments submitted on preliminary versions and components of the DEIS may still apply.

Our comments are provided as a cooperating agency pursuant to the National Environmental Policy Act (NEPA) and 40 Code of Federal Regulations Part 1500-1508, 43 C.F.R. 46.230, and as requested per the March 2012 Memorandum of Understanding (MOU) between BLM, the U.S. Fish and Wildlife Service (Service) and the U.S. Forest Service (USFS). Our comments are authorized under the Endangered Species Act (ESA) 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.).

## General Comments

**Conservation Objectives Team Report Consistency.** Our review of your DEIS is provided largely in the context of the Final Greater Sage-Grouse Conservation Objectives Team Final Report (COT Report; U. S. Fish and Wildlife Service 2013). Our purpose for developing the COT Report was to provide range-wide conservation objectives that, if met, would indicate that threats to the species have been reduced or ameliorated so that it is no longer in danger of extinction or likely to become so in the foreseeable future. Therefore, our comments on the subject DEIS are designed to assess whether or not it meets the COT Report objectives for each threat. A preliminary, qualitative assessment of DEIS proposed action consistency with the COT Report is provided for each alternative in the attached Matrix (USFWS BLM RMP Alternative Review Matrix). It should be noted that consistency ratings did not consider COT Report threat classifications (e.g., ratings at this stage did not consider whether threats were widespread, localized, or not known to be present in the planning area). We hope this information enhances the BLM's own COT Report consistency evaluation presented in the DEIS.

The DEIS proposes alternative actions, components, and other conservation measures that would benefit the GSG and improve GSG conservation in the LFO planning area under all of the action alternatives (B, C, and D [agency preferred]) in comparison to the no action alternative (A). However, we do not believe that the RMPA purpose, goals, and objectives for GSG are thus far clearly met, nor threat amelioration yet clearly demonstrated, by the preferred or other alternatives analyzed in the DEIS. Based on the following comments, as well as comments and information presented in the attached matrix, we recommend that BLM provides some additional clarification, detail, and measures with respect to individual actions across all alternatives to demonstrate COT Report consistency, GSG conservation, and threat amelioration in the LFO planning area.

**Planning Area Consistency.** Our review focused on whether the DEIS alternatives addressed the threats as identified in the COT Report for the LFO planning area. We recognize that there are differences between the individual BLM Montana RMP planning efforts, as well as between Montana RMP planning efforts and those of neighboring states. We encourage the BLM to

resolve any inconsistencies across planning boundaries where these differences do not have a clear scientific basis. Where differences in management are warranted across planning boundaries, the rationale for divergent management approaches should be fully explained. It is our understanding that there will be Federal Family meetings in February where we look forward to providing additional input as the BLM planning units work to resolve issues of consistency and efficacy within and across planning boundaries.

The DEIS did not provide sufficient detail for us to fully evaluate the adequacy of several key components of the plan, including: habitat and disturbance monitoring, adaptive management, fire and invasive species management, and mitigation. 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 is critical that the FEIS provide additional specificity in each of these areas. Specific areas of uncertainty include, but are not limited to: details on how habitat and disturbance be monitored; triggers and responses for adaptive management; methods of landscape-scale prioritization and implementation of step-down assessments for addressing threats from fire and invasive species; and, details on how mitigation will be applied. Additional details regarding these areas are provided in the comments below.

**Disturbance Cap.** The preferred alternative does not include a percent surface disturbance cap. Alternative B includes an objective for remaining under 3% anthropogenic disturbance in GSG priority habitat (PH) and managing or restoring PH such that at least 70% of the land cover provides adequate sagebrush to meet GSG needs. While this 3% disturbance cap objective is consistent with recent literature and viewed favorably by the Service, it is not clear in the DEIS how this objective would be implemented or measured (e.g., disturbance scale, baseline date, whether fire would be included, other types of disturbances to be included, spatial/temporal monitoring scale, etc.). It is also not clear how the Alternative B components (including application of Appendix C) would be applied to comply with this objective, or how the net result of compliance with this objective compares with the impacts to GSG potentially resulting from other alternatives, including the preferred alternative. This analysis should be included in order to truly consider and compare the effects of Alternative B with the preferred alternative.

The Service recommends implementation of a 3% disturbance cap, including fire; however, if your selected alternative does not include a 3% surface disturbance cap, then we recommend that you evaluate the available literature and provide a clear analysis and rationale in the FEIS of the comparable effects of your selected GSG conservation approach, along with how impacts would be measured. Consideration of the efficacy of other relevant conservation measures in your selected alternative could also be included in the justification.

**Lek Buffers.** The DEIS specifies no permanent lek buffers in the preferred alternative; seasonal lek and winter habitat surface use restrictions are only provided for solid minerals development. We recommend that BLM consider adding permanent lek buffers in the Best Management Practices/Required Design Features (BMP/RDF) measures or as components of the preferred alternative actions. Please consider a range of 1 to 4 mile permanent lek buffers relative to proposed surface-disturbing and disruptive activities in PH. We consider 4 mile lek buffers to be

protective of most nesting habitat in Montana; lesser buffers may be effective when considered in combination with other conservation measures and the nature of the proposed activity. Permanent lek buffers in general habitat (GH) and seasonal buffers in both PH and GH should also be considered relative to surface-disturbing and disruptive activities.

Lek buffers should be applied to "occupied" leks as defined in the DEIS (active during at least one strutting season during prior 10 years). If applied to "active" leks, then the definition for "active" leks in the DEIS (any lek that has been attended by male GSG during the strutting season) should minimally be revised to be consistent with Connelly et al. (2000), who define an active lek as a traditional display area in or adjacent to sagebrush-dominated habitats that has been attended by >2 male sage grouse in >2 of the previous 5 years.

The rationale for any proposed GSG distance buffers in the appendices or within alternative components should be provided and discussed. Where lek buffers are not specified in the selected alternative, the DEIS should provide clear explanation as to how similar GSG protections would be achieved (e.g., use of No Surface Occupancy [NSO] stipulations, exclusion areas, noise limitations, etc.).

**Specific Comments**

**Chapter 4.** Many of our primary comments regarding the effects analysis are provided below under the individual threat categories and in the attached matrix. In addition:

- We were unable to locate where indicators of impacts to GSG (acres of sagebrush habitat and average male lek attendance for large, medium, and small leks) were applied in the effects analysis or discussion. These indicators should be factored into the analysis in order to facilitate adequate alternative evaluation.
- We appreciate the effort in Table 4-3 to summarize how threats would be ameliorated under each alternative, and found the table useful. It would be helpful to provide additional clarification in the FEIS with respect to proposed actions, BMPs/RDFs, and threat amelioration determinations, as discussed in the comments below. Sagebrush elimination, conifer expansion, recreation, and (non-water development) range management structures / fencing were not specifically addressed and we recommend that these threats be directly addressed in the table. We also recommend that all threats be addressed in the same format, including the assessment of consistency with COT Report objectives that was provided for some threats.

**Chapter 5.** We recommend that the GSG cumulative effects discussion in the FEIS incorporate the Montana Greater Sage-Grouse Habitat Conservation Strategy and executive order intended to be implemented in spring 2014. The regulatory scope of this executive order is likely to include State and some private lands, depending on the permits involved and may overlap with BLM management.

**Required Design Features and Best Management Practices.** The GSG mitigation measures and conservation actions in Appendices C and D contain many measures that, if applied, could

be of potential conservation benefit to GSG. However, it appears that several project types and threat categories are not addressed within these measures. Additionally, the measures are currently proposed to be applied where "appropriate and necessary". As such, the Service cannot rely on the certainty of their implementation or effectiveness and would be unable to consider these measures when making a listing decision. We therefore recommend the following to increase the RDF/BMP conservation benefit and certainty of implementation/effectiveness:

- Please state explicitly in the FEIS, Appendices C /D, or other relevant appendices that these BMPs and RDFs (and possibly other) measures will be applied to proposed projects such that the projects comply with the RMPA GSG purpose, need, goals, and objectives. Proposed projects that do not comply should not receive approval.
- We recommend that measures specific to powerlines, pipelines, cell towers, and recreation should be added to these appendices as they do not currently appear to be included in the appendices or elsewhere in the DEIS. The additional RDFs for solid minerals in Appendix D (but omitted from Appendix C) should be included in the final selected set of BMPs/RDFs. Reference to Service communication tower siting guidance should also be included. We recommend that BMPs/RDFs provide clear consistency with conservation measures and options included in the COT Report.
- Per our comment above, we recommend that BLM consider adding permanent and seasonal lek buffers in the BMP/RDF measures or as components of the preferred alternative actions.
- We recommend that noise stipulations pertain to all surface disturbance/disruptive activities, including both during facility construction and long-term operation. We recommend allowance of no more than 10 dB above ambient or no more than a maximum of 34 dB at the edge of active leks (Blickely and Patricelli 2012).
- We recommend that compensatory mitigation be addressed or referenced for all surface disturbance activities in these appendices, and tied to Appendix G (see specific compensatory mitigation comment below).

**Compensatory Mitigation, Monitoring, and Adaptive Management.** Compensatory mitigation requirements (for unavoidable impacts) do not appear to be explicitly discussed under any of the alternatives in the DEIS, nor specified in Appendices C or D. Section 2.5 provides a summary of the general regional mitigation strategy contained in Appendix G, which we generally support; however, no discussion regarding compensatory mitigation is provided in this or other sections and should be added. The possibility of compensatory mitigation is mentioned in Table 2-4 and Appendix D (under Solid Minerals only). However, it is not presented as a requirement, nor is it discussed consistently with respect to all surface disturbance project types. The FEIS should convey how, and under what circumstances, GSG compensatory mitigation would be consistently applied for each surface disturbance related program. The FEIS should also incorporate the final (when available) Regional Mitigation Manual Section and, where appropriate, BLM Instruction Memorandum No. 2013-142.

Additional information regarding development of an adaptive management plan for the LFO planning area, including the development timeline and content of hard and soft adaptive management triggers and responses, as discussed in Section 2.7.2, should be provided. The

Service recommends that the FEIS include final habitat monitoring and adaptive management frameworks which we understand are currently in development. Additional monitoring comments relating to specific threats are provided below. In the FEIS, it is highly important that that the BLM provide a clear description of how these three components will be integrated into the structure of the selected alternative. Discussion between BLM and the Service is ongoing with respect to compensatory mitigation, monitoring, and adaptive management.

**Core Areas (Priority Areas for Conservation [PACs]).** BLM-administered lands comprise approximately 19% of proposed PH and 11% of proposed GH in the planning area. The proposed PH (Alternatives B, C, and D) appears to be inclusive of Montana Fish, Wildlife and Parks (FWP) mapped sage-grouse core areas and COT Report PACs in the Planning Area (FWP core areas and PACs are identical), which we support. Direct comparison (acres) of PH/GH with FWP core areas/GH and FWS PACs should be provided to clarify consistency with the State and PAC strategy. If inconsistencies are identified, PH should be revised to include all core areas/PACs, or clear rationale should be provided as to how these proposed areas are consistent with the core area/PAC mapping and protection intent, along with explanation as to how GSG conservation will be achieved in core areas/PACs not included in BLM PH. Mechanisms for incorporating new PAC/core information into PH (State core/connectivity habitat revisions, etc.) should be included in the FEIS.

Under all action alternatives, implementation of restoration projects is to be prioritized in PH based on variables most likely to benefit GSG. We are supportive of such projects. If known, additional information regarding what types of restoration activities are proposed, and anticipated GSG conservation benefits, would be useful. We also recommend that opportunities, including acquisition, to increase occupancy and connectivity between PACs, be actively pursued when appropriate.

**Energy Development.** New oil and gas development is deferred for all alternatives in the DEIS pending the RMP revision and the DEIS indicates that no new drilling permits are anticipated in the next decade in the planning area. However, it is difficult to determine exactly which operating constraints to protect GSG will occur for currently existing leases. For example, the DEIS (Table 2-4) lists several operating constraints for leases under all action alternatives, but states that the standard stipulations in Appendix J apply to existing leases. However, Table 4-3 indicates that the measures in Appendices C/D would apply to existing leases, and Section 3.7 indicates that BLM reserves the right to require additional mitigation measures in the form of conditions of approval (COAs) after a lease is issued if doing so is necessary to fulfill the BLM's multiple-use mandate. We recommend that lek buffers, noise restrictions at the edge of active leks (no more than 10 dB above ambient or no more than a maximum of 34 dB), and other measures be applied to existing leases where possible in required compliance with RMPA GSG goals and objectives (please see our BMP/RDF comments above).

We also recommend that wind energy development be specifically excluded in PH in the selected alternative. The FEIS should reference the FWS 2012 Land-based Wind Energy Guidelines where such development may ultimately be considered in ROW avoidance or other areas. GSG would be considered a species of habitat fragmentation concern per the Guidelines.

**Infrastructure.** Alternative D designates PH and some or all of GH as ROW avoidance areas. We recommend that PH be designated as ROW exclusion areas, or if they are designated as ROW avoidance areas, then the FEIS should specify that only projects demonstrated by the BLM to have no impacts on the maintenance of neutral or positive GSG population trends and habitats would be allowed. Again, we recommend that wind energy development be excluded in PH in the selected alternative. It is unclear from Table 4-3 whether all or a portion of GH would be ROW avoidance area under the preferred alternative. We are supportive of designating all GH as avoidance areas. Additionally, while concentrating infrastructure development and applying appropriate RDFs/BMPs could decrease the amount of affected GSG habitat, it is incorrect to consider these "direct beneficial effects from infrastructure on GSG" as stated in Table 4-3. Based on the discussion in Chapter 4, we have concerns that BLM lands in PH and GH under Alternative D would be used primarily to consolidate ROW activity, rather than first and foremost as important GSG areas/habitats to be avoided per the BLM definition of "ROW avoidance areas". Consolidation can potentially reduce impact footprints at the landscape level; however, PH avoidance (unless projects are demonstrated to have no impacts on the maintenance of neutral or positive GSG population trends and habitats) should be the highest priority. The preferred alternative does not currently specify under what specific conditions ROWs would be authorized in avoidance areas.

While some infrastructure measures are provided for fluid and solid minerals projects, the DEIS does not appear to provide RDFs/BMPs that apply to stand-alone powerline, pipeline, cell tower, or similar infrastructure projects that could be applied to BLM lands. Such measures should be included in the FEIS, should include reference to appropriate buffers, and explicitly be tied to required compliance with RMPA GSG goals and objectives.

The Service recommends that a timeframe for travel management planning completion under Alternative D be specified, and such planning be clearly prioritized by its potential to affect important GSG habitat. We recommend that the following road density limitations (Knick et al. 2013) be incorporated within (minimally) 5 km (3.1 miles) of active leks in PH: <1.0 km/km$^2$ (1.61 mi/mi$^2$) of secondary roads, 0.05 km/km$^2$ (0.08 mi/mi$^2$) of highways, and 0.01 km/km$^2$ (0.02 mi/mi$^2$) of interstate highways. We also recommend that road placement in GSG habitat, or within 400 m (0.25 mile) of nesting habitat, be avoided where possible in PH (Wisdom et al. 2011). It is unclear why compensatory mitigation for roads is not referenced for the preferred alternative; the selected alternative should follow the compensatory mitigation strategy in Appendix G (please see the compensatory mitigation comment above).

**Grazing.** The DEIS introduction section states "*For BLM-administered lands, all activities and uses within GSG habitats will follow* <u>*existing*</u> (emphasis added) *land health standards.* It should be clarified here that specific GSG habitat objectives are to be developed and applied under the selected alternative. The timeline for development of these GSG objectives in the selected alternative should be specified, and the GSG objectives to be applied in the interim should be referenced. We recommend interim application of objectives based on Connelly et al. (2000) and Hagen et al. (2007). Appendix F should also include GSG objectives or reference objectives to be applied until local objectives are developed. Discussion in the monitoring appendix (Appendix B) suggests that habitat indicator data collected at the fine and site scales will be

consistent with the Habitat Assessment Framework (HAF) and Connelly et al. (2000), and potentially adjusted for local conditions. While we support this approach, the relationship (including timelines) between GSG objectives development and application as discussed in Chapter 2, Appendix B, and Appendix F is not clear and should be more fully described. We also recommend addressing how habitat objectives would be handled during drought periods.

Based on Table 2-4, it is currently unclear whether application of and adherence to GSG objectives would be "considered" or "required" under Alternative D in PH. Application and adherence to GSG objectives should be required in the selected alternative. Allotment assessment prioritization under Alternative D is also unclear; are expiring permits in PH prioritized, or are allotments with the best GSG opportunity (regardless of permit status) prioritized? We recommend the latter approach and increasing the frequency of allotment assessment (currently approximately 10 years) in PH. Also, the monitoring timeframes and consequences of allotment non-compliance with objectives following corrective action implementation should be specified. Increasing frequency of allotment assessment and conveying the consequences for non-compliance are important, given that the LFO is currently unable to determine through monitoring whether grazing management changes implemented on 105,437 acres of preliminary PH and preliminary GH that were not meeting standards have resulted in those lands meeting standards.

**Invasive Plants, Fire, and Sagebrush Treatment.** The Service has funded the Western Association of Fish and Wildlife Agencies (WAFWA) to develop a set of concise, prioritized and integrated actions land managers and policy makers can take to preclude the dominance of invasive species and reduce their influence on the fire cycle in sagebrush ecosystems. BLM should continue to incorporate this and additional guidance into the FEIS as it becomes available; discussion between BLM and the Service is ongoing with respect to invasive species and fire. A timeline for LFO completion of the GSG Wildfire and Invasive Species Habitat Assessment in Appendix K should be provided in the FEIS.

The preferred alternative does not prohibit prescribed fire in sagebrush habitats per the COT Report recommendations. Prescribed fire should be prohibited in sagebrush, including GSG breeding and winter habitats. If necessary, such prescribed fire should only be allowed on a case-by-case basis if can be determined (along with specification as to how this determination would be made and a risk assessment) to be neutral or beneficial to GSG. These conditions and supporting information should be included in the FEIS for the selected alternative. In Chapter 4 it is stated that in the LFO, controlled burning is used primarily in ponderosa pine areas to limit conifer spread and is not used in GSG habitat. If fire is not used in GSG habitat, the FEIS should clarify why prescribed burning in GSG habitat is included in the preferred alternative. The FEIS should also explain how post-burn restoration programs under the preferred alternative would help regrowth more than they would under all other alternatives, as stated in Chapter 4.

Restoration monitoring commitments in the DEIS (e.g., duration, targets, etc.), and commitments to make adequate corrections to management efforts if needed under each action alternative, are unclear and should be listed and discussed. To meet the intent of the COT Report, all post-fire monitoring and control of invasives should be conducted for a minimum of 3 years. Measures

for avoiding and minimizing sagebrush elimination, including avoidance of sagebrush removal in breeding or wintering habitats, should be specifically addressed in the FEIS.

The DEIS states that BLM will develop vegetation management objectives, including objectives for managing noxious weeds and invasive species and identifying the desired future condition for specific areas, within GSG habitat. A timeline for the development of these objectives should be provided. The DEIS also states that for all alternatives, integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2. Please provide a description / summary of this handbook in the FEIS in order to facilitate understanding and evaluation of these procedures and measures.

**Agricultural Conversion / Ex-Urban Development.** In addition to the actions and measures included in the DEIS for the action alternatives, we specifically recommend that no relinquishment or land exchanges be permitted that would result in agricultural conversion or urban development in PH/GH.

**Conifer Encroachment.** Mechanized treatments targeting conifer encroachment are generally referenced in the DEIS under Alternative B and C, and potentially under Alternative D, but are not discussed in terms of treatment prioritization, proposed total treatment area, timelines, etc. We recommend that such mechanized treatment be incorporated into the selected alternative, and that such supporting information be included in the FEIS.

Based on long-term conifer encroachment, Chapter 4 states that since Alternative B would prioritize treatments in PH, and there is no PH in the planning area portion of the Belt Mountains population, it is unlikely that sagebrush habitats would be maintained on BLM-administered land in this population under Alternative B. However, no analysis with respect to this issue is provided for Alternatives C and D, under which treatments in GH are "allowed", but no local prioritization or plan for addressing conifer encroachment has been specified. This issue is unlikely to be resolved under any alternative unless the area is targeted for conifer removal efforts. Such targeting should be identified in the FEIS for both planning area GSG populations under the selected alternative.

The DEIS currently does not, but should contain measures addressing the "no net conifer gain" principle per the COT Report. We recommend that such measures be incorporated for GSG habitats, and prioritized within PH, in the FEIS. We also recommend enactment of measures to reduce conifer cover to 0% within (minimally) 1,000 meters of leks in PH where conifer encroachment is an issue to facilitate the preservation of lek and associated nesting activity (Baruch-Mordo et al. 2013). This could also potentially be employed as a restoration measure where leks may have been lost. However, if the lek is within 1km of an old growth conifer stand, the old growth should be retained for its value to the ecosystem and other species. Please include a definition for an old growth conifer stand in the FEIS.

**Recreation.** The DEIS states that BLM regulations (43 CFR, Parts 8341.2 and 8364.1) allow for area, road or trail closures where OHVs are causing, or would cause considerable adverse effects

on wildlife and its habitat. However, no discussion is provided as to whether OHV areas have been identified to be causing adverse GSG impacts, or whether such evaluations have taken place (or are proposed). This information should be provided in the FEIS. The DEIS also states that during the breeding season, recreation permits would not be issued in the vicinity of leks to promote nesting success. We support this concept; however, we recommend that RDFs/BMPs for recreation be added to for the selected alternative to address lek buffers and include other GSG measures pertaining to recreational development/use. Also please see Infrastructure above for travel management planning comments.

**Range Improvement Structures/Fencing.** Under Alternatives B and D, range improvement structure and supplements would be designed to conserve, restore, or enhance GSG habitat, which we support. Such projects, as well as livestock trailing, should also incorporate timing considerations at the implementation phase such that they avoid and minimize impacts to GSG. Placement of new fences and livestock management facilities (including corrals, loading facilities, water tanks and windmills) should consider their impact on GSG and, to the extent practicable, be placed at least 1 km from occupied leks (Stevens et al. 2012). Existing and new fences necessary for range improvements should be marked with permanent flagging or other suitable devices to reduce GSG collisions per Stevens et al. (2012), if they are considered to be in high risk areas for collision (within 2 kms of occupied leks).

The proposed 10-year existing structure evaluation period under the preferred alternative is unlikely to achieve timely conservation and should be shortened to the extent possible in the selected alternative, with prioritization applied to important GSG habitats. Additionally, approximate timeframes for responding to identified problem structures should be provided.

**Mining.** Mining was not identified in the COT Report as a known threat to either GSG population in the planning area. The DEIS states that there are no coal leases or known coal resources in the planning area, that any coal development within the planning area would require a RMPA EIS and be subject to RDFs, and that no locatable mineral development potential has been identified within GSG habitat. However, based on the actions described, some issues may require some additional clarification as described below.

Uncertainty regarding application of RDFs/BMPs to all proposed projects (including mining), along with the absence of buffers, is described above. Under Alternative D, prospecting permits for non-energy leasable mineral development would be subject to mitigation, but mitigation is not described or defined. BMPs for locatable mineral development are "suggested" under Alternative D; such BMPs should be required to the extent possible (e.g., applied as RDFs) in compliance with RMPA GSG goals and objectives. At a minimum, we recommend that language similar to Alternative B be included in the selected alternative for locatable mineral development. We recommend that in PH, offset mitigation and measures are required to prevent unnecessary or undue degradation (App. D) in the plan of operations. The effects of salable mineral development on GSG were not, but should be, assessed in Chapter 4 for each alternative, and conservation measures consistent with the achievement of RMPA GSG goals and objectives should be applied in the selected alternative. Also, it is unclear whether PH/GH constitutes "key wildlife areas" for salable mineral development as suggested in Table 4-3 and would therefore

require no surface occupancy under Alternative D. We recommend that PH/GH be considered as such "key wildlife areas" in the selected alternative.

**Functionality.** Some proposed actions in the DEIS are conditioned such that they would not impact the "functionality" of GSG habitat. An example is provided from Table 2-4 under Alternative D for fluid minerals: *Surface-disturbing/disruptive activities would avoid or minimize disturbance to GSG or their habitat. Except as identified above or during emergency situations, activities would not compromise the functionality of the habitat.* A definition for functionality and description of criteria/standards and assessment methodology to evaluate functionality should be provided for this term as it applies to GSG.

Thank you again for the opportunity to review and comment on this document. We hope you find these comments useful as you continue forward with this effort. If you have any questions or concerns regarding these comments, please feel free to contact Jeff Berglund at 406/449-5225, ext. 206, or contact me at ext. 205 or at the letterhead address.

**Literature cited**

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**USFWS BLM RMP Alternative Review Matrix (2/18/14)**
**BLM Plan:** Lewistown DRMPA/DEIS
**Program Area:** All
**GSG Population(s):** Yellowstone Watershed, Belt Mountains

| Issue[1] | Conservation Objective from COT Report | Conservation Measures / Options from COT Report | Preliminary Assessment of Proposed Action Consistency with COT Report[2,3] | | | | |
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| | | | Alternative A | Alternative B | Alternative C | Alternative D | Comments |
| **PACs** | Retain sage-grouse habitats within PACs *(pertains to PAC designation; actions below this line are evaluated independent of PAC designation for each Alternative)* | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N | PH designated (233,219 ac): Y?; GH designated (112,341 ac): Y? | PH designated (233,219 ac): Y?; GH designated (112,341 ac): Y?; PH areas for GRSG with at least 4,000 acres of contiguous BLM surface ownership would be designated as ACECs, totaling 96,246 acres. | PH designated (233,219 ac): Y?; GH designated (112,341 ac): Y? | PH/GH appears to match FWP core/GH. Direct comparison (acres) of PH/GH with FWP core areas/GH and FWS PACs should be provided. This should ultimately be consistent with State and PAC strategy. |
| | If PACs are lost to catastrophic events, implement appropriate restoration efforts | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N; | See Fire section below. App. C (PH): N | See Fire section below.App. C (PH/GH): N | See Fire section below. App. D (PH): N | Not specifically addressed in App. C or D. |
| | Restore and rehabilitate degraded sage-grouse habitat within PACS. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N; Surface-disturbing activities > 0.25 acre would require the initiating party to rehabilitate the disturbance: U. Revegetation species would be determined during the site-specific EA phase:U | In PH, prioritize imp. of rest. projects based on env. variables that improve success potantial in areas most likely to benefit SG: Y. Prioritize rest. in seasonal habitats thought to be limiting SG distribution or abundance: Y. Include SG habitat parameters (Connelly et al. (2000) and Hagen et al. (2007)) or state SG plans and appropriate local information in habitat rest. objectives: Y. Make meeting these objectives within PH the highest rest. priority: Y. In PH, restore salable mineral pits no longer in use to meet SG habitat objectives: Y; App. C (PH): P* | In PH, prioritize imp. of rest. projects based on env. variables that improve success potantial in areas most likely to benefit SG: Y. Prioritize rest. in seasonal habitats thought to be limiting SG distribution or abundance and where factors causing degradation have been addressed (e.g., changes in livestock management): Y. Include SG habitat objectives in habitat rest. projects: Y. Make meeting these objectives within PH and GH the highest rest. priority: Y. In PH/GH, restore salable mineral pits no longer in use to meet SG habitat objectives: Y; App. C (PH/GH): P* | In PH, prioritize imp. of rest. projects based on env. variables that improve success potantial in areas most likely to benefit SG: Y. In PH/GH, prioritize rest. in seasonal habitats thought to be limiting SG distribution or abundance: Y. Consideration for other TES species would be evaluated in addition to SG when prioritizing restoration projects: U. Manage for suitable SG habitat for restoration projects within PH: Y?; App. D (PH): P* | General restoration targets, areas and timesframes should be specified in EIS. Alts C and D should reference specific habitat objectives to be applied. |

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| | Identify areas and habitats outside of PACs which may be necessary to maintain viability of sage-grouse. If development or vegetation manipulation activities outside of PACs are proposed, the project proponent should work with federal, state or local agencies and interested stakeholders to ensure consistency with sage-grouse habitat needs. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N; General measures inadequate: N | See GH measures under all threats; App C solid minerals measures apply to GH. | See GH measures under all threats; All App C measures apply to GH. | See GH measures under all threats; App D fluid and solid minerals measures apply to GH. | PAC/core area strategy not employed in Alt A; measures that remain are inconsistent with landscape-scale SG conservation approach. Recommend that a base lek protection buffer measure be applied to GH for all disturb/disrupt activities under Alts B and D. |
| | Re-evaluate the status of PACs and adjacent sage-grouse habitat at least once every 5-years, or when important new information becomes available. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N; | Not specifically addressed | Not specifically addressed | Not specifically addressed | Not specifically addressed in DEIS; not rated; should be addressed in EIS. What are the mechanisms for incorporating new PAC information into PH? |
| | Actively pursue opportunities to increase occupancy and connectivity between PACs. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH (no PACS): N; | Aquire lands benefitting SG habitat:Y? | Aquire lands in ACECs: Y?; | If offered, aquire lands benefitting SG habitat:U; | Not specifically addressed in DEIS. General timeframes / targets for aquisition should be discussed. Alt D does not constitute active pursuit of opportunities; non-acquisition opportunities were not specifically discussed. |
| | Maintain or improve existing habitat conditions in areas adjacent to burned habitat. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | Not specifically addressed | Not specifically addressed | Not specifically addressed | Not specifically addressed | Not specifically addressed in DEIS; not rated; should be addressed in EIS. |
| **Fire - YW = L; BM = L** | Retain and restore healthy native sagebrush communities within greater sage-grouse range | Restrict or contain fire within the normal range of fire activity (assuming a healthy native perennial sagebrush community), including size and frequency, as defined by the best available science. | Not specifically addressed | Not specifically addressed | Not specifically addressed | Not specifically addressed | Not specifically addressed in DEIS; not rated; should be addressed in EIS. Also, estimates for wildfire are the same under each alt (2,000 ac/10 yrs) - but analysis not tailored to SB or PH - are reductions in SB / PH / GH anticipated? |

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| | | Eliminate intentional fires in sagebrush habitats, including prescribed burning of breeding and winter habitats. | Prescribed burning in SB would be administered on an individual basis:N; Land treatments would be designed to maintain sagebrush levels within the desired canopy cover range 15 to 50% and to increase the amounts of succulent forbs: U. Controlled burning in conifer and sagebrush types would be done on an individual basis to improve wildlife habitat: N. | Do not use fire to treat SB <12-in precip.zones in PH. If as a last resort and after all other treatment opportunities have been explored and site-specific variables allow, use of prescribed fire for fuel breaks that would disrupt the fuel continuity across the landscape could be considered, in stands where cheatgrass is a very minor component. No reduction of SB cover to < 15% unless a fuels management objective requires such reduction in SB cover to meet strategic protectionof PH and conserve habitat quality for SG:N; App. C:N | Do not use fire to treat SB <12-in precip.zones in PH/GH. If as a last resort and after all other treatment opportunities have been explored and site-specific variables allow, use of prescribed fire for fuel breaks that would disrupt the fuel continuity across the landscape could be considered, in stands where cheatgrass is a very minor component. No reduction of SB cover to < 15% unless a fuels management objective requires such reduction in SB cover to meet strategic protectionof PH/GH and conserve habitat quality for SG.App. C:N | Sites should not be burned unless: a) Biological and physical limitations of the site and impact on SG are identified and determined to be neutral or beneficial to PH, b) Management objectives for the site are clearly defined, c) Potential for weed invasion and successional trends are well understood, and d) Capability exists to manage the post-burn site properly, including a funded monitoring schedule, to achieve a healthy SB community. Manage grazing, weeds, reseeding, or other activities that potentially influence the outcome of rehabilitation or treatment in a manner that achieves the desired condition of the burned site. No reduction of SB cover to < 15% unless a fuels management objective requires such reduction in SB cover to meet strategic protectionof PH and conserve habitat quality for SG.App. D:N | No alternative prohibits prescribed fire in SB habitats. Where not prohibited in SB habitat per COT Report recommendations, prescribed fire should only be allowed on a case-by-case basis if can be determined (along with specification as to how this determination would be made and a risk assessment) to be neutral or beneficial to SG. These conditions and information should be included in the EIS. EIS states in the LFO, controlled burning is used primarily in ponderosa pine areas to limit conifer spread and is not used in SG habitat - so is unclear why prescribed fire is included in preferred alt. |
| | | Design and implement restoration of burned sagebrush habitats to allow for natural succession to healthy native sagebrush plant communities. | No PH or similar measures: N | In PH, prioritize native seed allocation for use in SG habitat when in short supply: Y. Native plant seeds for ES&R seedings is required - where probability of success or seed availability low, nonnative seeds may be used, if meet SG habitat objectives: Y. Reestablishing appropriate SB and understory plants highest priority for rehabilitation: Y. Rest treated areas from grazing for two growing seasons unless vegetation recovery dictates otherwise:Y. Design post fuels management projects to ensure long-term persistence of seeded or pretreatment native plants: Y. App. C: P*; | In PH/GH, prioritize native seed allocation for use in SG habitat when in short supply: Y. Native plant seeds for ES&R seedings is required - where probability of success or seed availability low, nonnative seeds may be used, if meet SG habitat objectives: Y. Reestablishing appropriate SB and understory plants highest priority for rehabilitation: Y.Design post fuels management projects to ensure long-term persistence of seeded or pretreatment native plants: Y. Post-fire recovery to include livestock exclosures that can be used to assess recovery - grazing should be excluded from burned areas until plants achieve GRSG habitat objectives: Y. App. C: P*; | In PH, prioritize native seed allocation for use in SG habitat when in short supply: Y. Native plant seeds for ES&R seedings is required - where probability of success or seed availability low, nonnative seeds may be used, if meet SG habitat objectives: Y. Reestablishing appropriate SB and understory plants highest priority for rehabilitation: Y. Design post ES&R management to ensure long term persistence of seeded or pre-burn native plants: Y. Requirements for resting or deferring areas from livestock grazing following fire would depend on a variety of factors, including resource objectives, the type of fuel, time and intensity of burn, accessibility of the burned area to livestock, and post-burn climatic factors: U.App. D: P* | Not specifically addressed in EIS or in App. C or D. Post restoration grazing limitations should be dependent on attainment of SG objectives. |

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| | | Implement monitoring programs for restoration activities. To ensure success, monitoring must continue until restoration is complete, with sufficient commitments to make adequate corrections to management efforts if needed. | No monitoring specified: N | Monitor and control invasive vegetation post-treatment: U; Appendix B: U | Any vegetation treatment plan must include long-term monitoring where treated areas are monitored for at least three years before grazing returns and for five years after livestock are returned to the area:U; Appendix B: U | Monitor and control invasive vegetation post-treatment: U. Appropriate pre and post treatment monitoring would be established to document impacts and success of treatments: U; Appendix B: U | Restoration monitoring commitments (duration regardless of grazing involvement, targets other than invasives - such as seeded/planted species, etc.) for this RMP, and commitments to make adequate corrections to management efforts if needed under each action alternative, are unclear and should be clarified. |
| | | Immediately suppress fire in all sagebrush habitats. | Intensive suppression would be applied to areas with high resource values:U; No PH/GH: N; | In PH, prioritize suppression, after life and property - App K would be completed to help refine fire management actions after RMP completion; Y? In GH, prioritize suppression where wildfires threaten PH. App. C: P*; | In PH/GH, prioritize suppression, after life and property - App K would be completed to help refine fire management actions after RMP completion; Y? App. C: P*; | In PH, prioritize suppression, after life and property - App K would be completed to help refine fire management actions after RMP completion; Y? In GH, prioritize suppression where wildfires threaten PH. App. D: P*; | A timeline for LFO completion of the SG Wildfire and Invasive Species Habitat Assessment in Appendix K should be provided. Uncertain which measures in App. C and D would be applied |
| | | Which (if any) of Options 1a - d were applied? | No PH/GH: N; Alt A: a?, b?, c? | Alt B (PH): a, b, c; App. C (PH): a*, b*, c* | Alt C (PH/GH): a, b, c; App. C (PH/GH): a*, b*, c* | Alt D (PH): a, b, c; App. D (PH): a*, b*, c* | Uncertain which measures in App.C and D would be applied; all discretionary BMPs /RDFs should be explicitly tied to required achievement of RMP SG goals and objectives. |
| | | Which (if any) of Options 2a - j were applied? | No PH/GH: N; Alt A: None | App. C (PH): b*, c*, d*, e*, f*, i* | App. C (PH/GH): b*, c*, d*, e*, f*, i* | App. D (PH): b*, c*, d*, e*, f*, i* | Same as above |
| | | Which (if any) of Options 3a - e were applied? | No PH/GH: N; | Alt. B (PH): b*, c*, d*; App. C (PH): b*, c*, d* | Alt. C (PH/GH): b*, c*, d*, e*; App. C (PH/GH): b*, c*, d* | Alt. D (PH): b*, c*, d*; App. D (PH): b*, c*, d* | Same as above. Only Alt C prioritizes PACs over habitats outside of PACs for restoration. |
| | | Was Option 4 (IM 2011-138) applied? | N | N | N | N | Should include this IM, updated to 2013-128 |
| **Non-native, Invasive Plant Species -** | Maintain and restore healthy, native sagebrush communities | Retain all remaining large intact sagebrush patches, particularly at low elevations. | See all other threats | See all other threats | See all other threats | See all other threats | Rating based mainly on how disturbance from all other threats would be reduced/eliminated. |

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| **Weeds/Annual Grasses - YW = Y; BM = Y** | | Reduce or eliminate disturbances that promote the spread of these invasive species. | Noxious weed control on affected grazing allotments would be implemented through Weed Control Cooperative Range Improvement Project Agreements: Y? No assured SG consideration in land treatments: N; See all other threats. | 3% dist. objective apply?:U; 70% SB objective apply?: U; See all other threats. | See all other threats. | Noxious weed control on affected grazing allotments would be implemented through Weed Control Cooperative Range Improvement Project Agreements: Y?; See all other threats. | Application of 3% disturbance and 70% SB objectives for Alt B unclear / not analyzed. Rating based mainly on how disturbance from all other threats would be reduced/eliminated. Uncertain which measures in App.C and D would be applied; all discretionary BMPs /RDFs should be explicitly tied to required achievement of RMP SG goals and objectives. |
| | | Monitor and control invasive vegetation post-wildfire for at least three years. | N | N | N | N | Not specificall addressed under any alternative. Recommend commitment to monitor for at least 3 years |
| | | Require best management practices for construction projects in and adjacent to sagebrush habitats to prevent invasion. | ROW holder must control weeds for life of ROW: Y; Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2: Y?. No measures specific to PH/GH: N | In PH, monitor / treat invasive species associated with existing range improvements: Y? Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2: Y? App.C: P* | In PH, monitor / treat invasive species associated with existing range improvements: Y? Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2: Y? App.C: P* | In PH/GH, monitor / treat invasive species associated with existing range improvements: Y? ROW holder must control weeds for life of ROW: Y? Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species, in accordance with BLM Handbook H-1740-2: Y? App.D: P* | Uncertain which measures in App.C and D would be applied; all discretionary BMPs /RDFs should be explicitly tied to required achievement of RMP SG goals and objectives. |
| | | Restore altered ecosystems such that non-native invasive plants are reduced to levels that do not put the area at risk of conversion if a catastrophic event were to occur. | Not specifically addressed: U | Not specifically addressed. Evaluate existing seedings composed of primarily introduced perennial grasses in and adjacent to PH to determine if they should be restored to SB or habitat of higher quality for SG: U. App C: P* | Not specifically addressed. Evaluate existing seedings composed of primarily introduced perennial grasses in and adjacent to PH/GH to determine if they should be restored to SB or habitat of higher quality for SG: U; App C: P* | Not specifically addressed. Evaluate existing seedings composed of primarily introduced perennial grasses in and adjacent to PH to determine if they should be restored to SB or habitat of higher quality for SG. App D: P* | Not specifically addressed in DEIS; should be addressed in EIS. General targets / timelines should be provided. |

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| **Energy Development - YW = Y; BM = L** | Energy development should be designed to insure that it will not impinge upon stable or increasing greater sage-grouse population trends | Avoid energy development **in PACs**. Identify areas where leasing is not acceptable, or not acceptable without stipulations for surface occupancy that maintains SG habitats. | No PACS. WE allowed (BMPs):N; O&G new leasing deferred in PH/GH: Y. Explor. allowed w/ no conditions: N; | WE excluded in PH, avoided in GH: Y; O&G new leasing deferred in PH/GH: Y. Allow geophysical exploration within PH to obtain exploratory information for areas outside of and adjacent to PH. Allow only geophysical operations by helicopter-portable drilling methods and in accordance with seasonal timing restrictions and other restrictions that may apply:Y? | WE excluded in PH / GH: Y; O&G new leasing deferred in PH/GH: Y. Allow geophysical exploration within PH and GH areas to obtain exploratory information for areas outside of and adjacent to SG habitat areas. Allow only geophysical operations by helicopter-portable drilling methods and in accordance with seasonal timing restrictions or other restrictions that may apply. Geophysical exploration would be subject to seasonal restrictions that preclude activities in breeding, nesting, brood rearing, and winter habitats during SG season of use:Y; No new geophysical exploration permits would be issued: Y | WE avoidance in PH/GH: U; O&G new leasing deferred in PH/GH: Y. Allow geophysical exploration within PH to obtain exploratory information for areas outside of and adjacent to PH. Allow only geophysical operations by helicopter-portable drilling methods and in accordance with seasonal timing restrictions and other restrictions that may apply:Y? | "Seasonal timing restrictions and other restrictions that may apply" under alts B and D should be specified or referenced as they are under C. FWS recommends that wind energy be excluded in PH and (minimally) avoided in GH. The EIS should reference the FWS 2012 Land-based Wind Energy Guidelines. **DEIS states no new wells are anticipated to be drilled in LFO in the next decade**. |
| | | If avoidance is not possible **in PACs** due to pre-existing valid rights, adjacent development, or split estate issues, development should only occur in **non-habitat areas**, including all appurtenant structures, with an **adequate buffer** that is sufficient to preclude impacts to sage-grouse habitat from noise, and other human activities.<br><br>If development must occur **in sage-grouse habitats** due to existing rights and lack of reasonable alternative avoidance measures, the development should occur in the **least suitable habitat** for sage-grouse and be designed to ensure at a minimum that there are **no detectable declines** in SG population trends (see row below and COT report for measures to facilitate this). | No PACS. New leases deferred. O&G exist. leasing subject to minimal stipulations in App. J: N | See cell above for explor. New leases deferred. DEIS (Table 2-4) lists 9 terms & conditions for leases, but states that standard stipulations in App. J apply to existing leases: N; Table 4-3, however, indicated that App. C (PH) would apply (?): U; | See cell above for explor. New leases deferred. DEIS (Table 2-4) lists 9 terms & conditions for leases, but states that standard stipulations in App. J apply to existing leases: N; Table 4-3, however, indicated that App. C (PH/GH) would apply (?): U; | See cell above for explor. New leases deferred. DEIS (Table 2-4) lists 9 operating constraints for leases, but states that standard stipulations in App. J apply to existing leases: N; Table 4-3, however, indicated that App. D (PH) would apply (?): U; | DEIS Tab 2-4 states that (inadequate) standard stipulations in App. J apply to existing leases and was rated accordingly; however, it is unclear as to what additional listed terms & conditions, operating constraints, or RDFs could apply. Alt D exceptions to operating constraints include if effects could be mitigated to an "acceptable level". This needs to be clarified/defined, as does the compensatory mitigation<br><br>requirement. At a minimum, projects should not proceed unless they are demonstrably complient with the RMP SG purpose & need, goals, and objectives. Unclear how Alt. B and C 3% surf. disturbance "cap" would be met/implemented (no analysis). RDFs/BMPs in App C and D should be explicitly tied to compliance with RMP SG goals and objectives, monitoring, and adaptive management. App C/D appendices should include ref to appropriate buffers. |

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| | | Which (if any) of Measure 3a - 3e were applied? | Alt A: None; | Alt B (existing leases): None App. J: None | Alt C (existing leases): None; App. J: None | Alt D (existing leases): None; App. J: None | c (consolidation) and e (tall structure / noise minimization) may apply to existing leases if RDFs apply, but as written only App J applies. |
| **Sagebrush Removal / Elimination - YW = L; BM = L** | Avoid SB removal or manipulation in greater sage-grouse breeding or wintering habitats | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No assured SG consideration in land treatments: N; | 3% dist. objective apply?:U; 70% SB objective apply?: U; Prescribed burns and other removal treatments considered: N; App. C: P*; Allow no treatments in known PH winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and would maintain winter range habitat quality:Y? No reduction of SB cover to < 15% unless required to meet strategic protectionof PH and conserve habitat quality for SG:Y?; | Prescribed burns and other removal treatments considered: N; App. C: P*; Allow no treatments in known PH/GH winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and would maintain winter range habitat quality:Y? No reduction of SB cover to < 15% unless required to meet strategic protectionof PH/GH and conserve habitat quality for SG:Y?; | Prescribed burns and other removal treatments considered: N; App. C: P*; Allow no treatments in known PH/GH winter range unless the treatments are designed to strategically reduce wildfire risk around or in the winter range and would maintain winter range habitat quality:Y? No reduction of SB cover to < 15% unless required to meet strategic protectionof PH and conserve habitat quality for SG:Y?; | Unknown how 3% disturbance or 70% SB objectives apply to treatments under Alt. B. No alternative prohibits prescribed fire in SB habitats. Where not prohibited in SB habitat per COT Report recommendations, prescribed fire should only be allowed on a case-by-case basis if can be determined (along with specification as to how this determination would be made and a risk assessment) to be neutral or beneficial to SG. |
| **Grazing - YW = Y; BM = Y** | Conduct grazing management for all ungulates in a manner consistent with local ecological conditions that maintains of restores healthy sagebrush shrub and native perennial grass and forb communities and conserves the essential habitat components for greater sage-grouse (shrub and nesting cover). Areas which do not currently meet this standard should be managed to restore these components. Adequate monitoring of grazing strategies and their results, with necessary changes in strategies, is essential to ensuring that desired ecological conditions and greater sage-grouse response are achieved. Livestock and wild ungulate numbers must be managed at levels that allow native sagebrush vegetative communities to minimally achieve Proper Functioning Conditions (PFC; for riparian areas) or Rangeland Health Standards (RHS; | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No PH:N; Prioritize assessments in Category I areas: U; Ground cover objectives: U; Consider riparian habitat in developing grazing systems: U; | Apply SG objectives in PH - If local/state seasonal habitat objectives are not available, use SG habitat recommendations from Connelly et al. (2000) and Hagen et al. (2007): Y; Intergated ranch planning in PH:Y; Prioritize assessments in PH: Y; In PH, conduct assessments w/SG objectives based on local conditions or literature: Y; In PH, manage for SG objectives: Y; Consequence for non-compliance unspecified :U; In PH prioritize evaluatiing effects to SG during droughts: Y; Manage riparian/wetland areas for PFC in PH:Y?; Consider allotment retirement in PH where permittee willing: U; Appendix F: P* | Remove all grazing in PH/GH: U (fencing impacts); Apply SG objectives in PH/GH (unspecified): NA?; In PH/GH, manage for SG objectives: NA?; Manage riparian/wetland areas for PFC in PH/GH:Y?; Consider allotment retirement in PH/GH where permittee willing: NA?; Appendix F:NA? | Consider SG objectives in PH: U; State objectives would be used for fine scale analysis unless local objectives are developed at the field office level, in partnership with MFWP and USFWS: U. Intergated ranch planning in PH:Y; Prioritize assessments for expiring permits in PH, allotments w/ best SG opportunity: Y?; In PH, conduct assessments w/SG objectives based on local conditions or State: Y?; In PH, manage for SG objectives: Y; In PH, prioritize evaluatiing effects to SG during droughts: Y; Manage riparian/wetland areas for PFC in LFO & reduce hot season grazing:Y?; Where standards not met, apply corective actions within 1 yr:U; Consider allotment retirement in PH where permittee willing: U; Appendix F: P* | "Consideration" of SG objectives under D is inadequate; SG objectives should be clearly applied. Therefore is unclear whether failure to meet SG objectives under D would result in any consequence. No consequence for non-compliance under Alt B. Assessment prioritization for D is unclear - are expiring permits in PH prioritized, or allotments w/best SG opportunity (regardless of permit status) prioritized? If possible, recommend increasing frequency of assessment (currently 10 years) in priority areas. SG objectives not yet developed for Alt C or D; timeline for development should be specified and objectives to be applied in interim should be explicitly stated (what state of MT objectives?). App. F contains / references no SG objectives - this should be included. Could be significant fencing impacts associated w/ Alt. C. |

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| | uplands). | Which (if any) of Options 1 - 5 were applied? | Alt A: 1?, 4; Appendix F: 1 | Alt B (PH): 1?, 4?, 5?; Appendix F: 1 | Alt C: NA?; Appendix F: NA? | Alt D (PH) 1?, 4?, 5?; Appendix F: 1 | Unclear whether App. F applies to Alt C. |
| **Range Management Structures (no ratings)** | Avoid or reduce the impact of RMS on greater sage-grouse | Range management structures should be designed and placed to be neutral or beneficial to sage-grouse. | Some general measures, but none specific to PH, GH, or SG: N | In PH, design new range improvement structures and supplements to conserve, enhance, or restore SG habitat: Y; Authorize new spring/seep development only if benefits PH: Y; App. C (PH; WNV): P* | No considerations for new range improvement structures: N; Authorize no new spring/seep development in PH/GH:Y; Manage water dev. to reduce spread of WNV:Y? App. C (PH/GH; WNV): P* | In PH, design new range improvement structures and supplements to conserve, enhance, or restore SG habitat: Y; Authorize new spring/seep development in PH only if neutral or ben. to SG: Y; Manage water dev. to reduce spread of WNV:Y? App. D (PH; WNV): P* | Design is addressed for B and D, but implementation (construction) should include timing considerations to avoid / minimize SG impacts. Unclear whether design imcludes implementation. |
| | | Structures that are currently contributing to negative impacts to either sage-grouse or their habitats should be removed or modified to remove the threat. | No specific measures proposed: N | In PH, evaluate structural range improvements and location of supplements to ensure they conserve, enhance, or restore SG habitat Modify spring/seep pipelines in PH for riparian continuity: Y?; See fencing:Y?; | In PH/GH, evaluate structural range improvements and location of supplements to ensure they conserve, enhance, or restore SG habitat Modify spring/seep pipelines in PH/GH for riparian continuity: Y?; See fencing:Y?; | In PH, during allotmen eval / watershed plainning process (10 yrs.) evaluate structural range improvements and location of supplements to ensure they conserve, enhance, or restore SG habitat Modify spring/seep pipelines in PH for riparian continuity: Y?; | General timeframes for evaluation under B or C should be provided. Ten year period for alt D is too long and should be shortened to the extent possible. No timeframe for responding to identified problem structures is provided for any alternative. |
| **FR Equid Management (NA in Montana)** | Protect sage-grouse from the negative influences of grazing by free roaming equids. | Develop, implement, and enforce adequate regulatory mechanisms to protect sage-grouse habitat from negative influences of grazing by free-roaming equids. | NA | NA | NA | NA | NA |

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| | | Manage free-roaming equids at levels that allow native sagebrush vegetative communities to minimally achieve PFC (for riparian areas) or RHS (for uplands). | NA | NA | NA | NA | NA |
| **Pinyon-juniper Expansion / Conifers - YW = L; BM = L** | Remove pinyon-juniper from areas of sagebrush that are most likely to support greater sage-grouse (post-removal) at a rate at least equal to the rate of p-j incursion | No conservation measures specified. Is conservation objective addressed applying locally-derived measures? | Conifer removal projects would continue using mechanical means and controlled burns: U. | Mechanized treatments targeting conifer encroachment: U; Conifer removal only appears as potential Fuels management RDF in App C: U | Mechanized treatments targeting conifer encroachment: U; Conifer removal only appears as potential Fuels management RDF in App C: U | Conifer removal only appears as potential Fuels management RDF in App D: U | Mechanized treatments targeting conifer encroachment referenced in DEIS for Alt B and C, but not explained - area, timing, etc. Does this apply to D also (not referenced)? "No net gain" principal in COT Report should be addressed in RMPA - with target of 0% w/in 1000 m of leks. |
| | | Which (if any) of Options 1 - 4 were applied? | None | None | None | None | |
| **Agricultural Conversion - YW = Y; BM = Y** | Avoid further loss of sagebrush habitat for agricultural activities (both animal and plant production) and prioritize restoration. In areas where taking agricultural lands out of production has benefited GSG, the programs supporting these actions should be targeted and continued (e.g., CRP/SAFE). Threat amelioration activities should, at a minimum, be prioritized within PACS, but should be considered in all greater sage-grouse habitats. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No assured SG consideration in land treatments: U; | Retain BLM ownership in PH w/exceptions beneficial to SG: Y; Aquire lands benefitting SG habitat:Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Retain BLM ownership in PH/GH w/ no exceptions: U Aquire lands in ACECs: Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Retain BLM ownership in PH w/exceptions beneficial to SG: Y; If offered, aquire lands benefitting SG habitat:Y; PH would be retained in public ownership, except when opportunities for land exchange would provide a greater benefit to GRSG habitat: Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Recommend that no relinquishment or land exchanges be permitted that would result in agricultural conversion in PH/GH. |
| | | Which (if any) of Options 1 - 4 were applied? | None - NA? | None - NA? | None - NA? | None - NA? | May be beyond scope of RMP |

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| **Mining - YW = N; BM = N** | Maintain stable to increasing greater sage-grouse populations and no net loss of greater sage-grouse habitats in areas affected by mining | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | Current 2800-ac mineral withdrawal: Y?; Open to leasible/salable minerals: N; Open to locatables; apply measures to prevent unnecessary or undue degradation:U; Prospecting permits for nonenergy leasibles subject to mitigation:U; 101 ac PPH / 2437 ac PGH closed to salables - rest considered case-by-case basis: U; MZ IV generally would be prohibited within public road corridors, ROWs, floodplains, and key wildlife areas: U. | 3% dist. objective apply?:U; 70% SB objective apply?: U; **Rec PH for locatable mineral withdrawal: Y;** For existing locatables in PH require offset mitigation and measures to prevent unnecessary or undue degradation (App. C) in plan of operations:P*; **Coal leasing unsuitable in PH: Y; No subsurface leases unless all surf. dist. outside PH: Y;** Minimize impacts to PH/GH for existing leases: Y?; **PH closed to nonenergy leasibles: Y;** Existing nonenergy mineral leases in PH follow RDFs in App. C: P*; **PH closed to salables:Y;** Where BLM owns the PH surface, but not the mineral estate, apply RDFs (App C) to surface: P*; If BLM owns estate but not surface, apply same measures as on BLM surface: U; . App. C (GH): P* | **Rec PH/GH for locatable mineral withdrawal: Y;** For existing locatables in PH/GH require offset mitigation and measures to prevent unnecessary or undue degradation (App. C) in plan of operations:P*; **Coal leasing unsuitable in PH/GH: Y; No subsurface leases unless all surf. dist. outside PH/GH: Y;** Minimize impacts to PH/GH for existing leases: Y?: **PH/GH closed to nonenergy leasibles: Y;** Existing nonenergy mineral leases in PH/GH follow RDFs in App. C: P*; **PH/GH closed to salables:Y;** Where BLM owns the PH/GH surface, but not the mineral estate, apply RDFs (App C) to surface: P*; If BLM owns estate but not surface, apply same measures as on BLM surface: U; | Keep current 2800-ac mineral withdrawal: Y?; Open to locatables; "suggest" measures to prevent unnecessary or undue degradation (App. D):U;Coal leasing allowed (RDFs in App. D), unsuitable case-by-case: P*; Prospecting permits for nonenergy leasibles subject to mitigation (App. D):P*; 101 ac PH / 2437 ac GH closed to salables - rest considered case-by-case basis using measures in App D: P*; Salables: surface occupancy within MZ IV generally would be prohibited within public road corridors, ROWs, floodplains, and key wildlife areas: U.Where BLM owns the PH surface, but not the mineral estate, apply RDFs (App D) to surface: P*; If BLM owns estate but not surface, apply same measures as on BLM surface: U; | **Mining not identified as threat to either population in COT Report. RMP states that there is no coal potential in the planning area. Any coal development within the planning area would require a plan amendment EIS. No locatable mineral development potential has been identified within SG habitat in the current RMPs.** Unclear how offset mitigation applies under Alt D (how does App. G apply?); **locatable BMPs are only "suggested" under Alt D (inadequate)**; Unclear if PH/GH constitutes "key wildlife areas" for salables and would require no surface occupancy. Application of 3% disturbance and 70% SB objectives for Alt B unclear / not analyzed. Unclear which BMPs would apply (all alts) - RDFs/BMPs in App C and D should be explicitly tied to compliance with RMP SG goals and objectives, monitoring, and adaptive management. App C/D appendices should include application of appropriate buffers. |
| | | Which (if any) of Options 1 - 4 were applied? | Alt. A: None | Alt B: 1, 2; App. C (PH/GH ): 4*; | Alt C: 1, 2; App. C (PH/GH ): 4*; | Alt D: None; App. D (PH/GH ): 4*; | |
| **Recreation - YW = L; BM = L** | In areas subjected to recreational activities, maintain healthy native SB 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 greater sage-grouse behavior. | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | No SRP consideration: N; Motorized travel limited to existing roads and trails: Y?; No TM planning proposed:N;BLM regulations (43 CFR, Parts 8341.2 and 8364.1) allow for area, road or trail closures where OHVs are causing, or would cause considerable adverse effects on wildlife and its habitat: U. | In PH only allow SRPs with neutral/beneficial effect to PH: Y; Complete PH TM planning w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails: Y?;BLM regulations (43 CFR, Parts 8341.2 and 8364.1) allow for area, road or trail closures where OHVs are causing, or would cause considerable adverse effects on wildlife and its habitat: U. During the breeding season, recreation permits would not be issued in the vicinity of leks to promote nesting success:Y? | No SRP consideration: N; Complete PH/GH TM planning w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails: Y? BLM regulations (43 CFR, Parts 8341.2 and 8364.1) allow for area, road or trail closures where OHVs are causing, or would cause considerable adverse effects on wildlife and its habitat: U. | In PH only allow SRPs if neutral/beneficial for GSG habitat: Y; TM planning "should be" completed w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails, BLM admin off-road use allowed: Y?; BLM regulations (43 CFR, Parts 8341.2 and 8364.1) allow for area, road or trail closures where OHVs are causing, or would cause considerable adverse effects on wildlife and its habitat: U. During the breeding season, recreation permits would not be issued in the vicinity of leks to promote nesting success:Y? | Timeframe for TM planning under D should be specified ("shall" vs "should" be completed). Unknown whether any problem OHV areas have been identified, or whether such evaluations have taken place (or are proposed). Lek buffer should be defined for alts B and D. |

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| | | Which (if any) of Options 1 - 2 were applied? | 1 | 1, 2? | 1 | 1, 2? | Motorized travel limited to existing roads and trails for all alts. Recommend avoiding development of recreational facilities in SG habitats. |
| **Ex-Urban Development / Urbanization - YW = N; BM = L** | Limit urban and exurban development in greater sage-grouse habitats and maintain intact native sagebrush communities | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | Not specifically addressed: N. | Retain BLM ownership in PH w/exceptions beneficial to SG: Y; Aquire lands benefitting SG habitat:Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Retain BLM ownership in PH/GH w/ no exceptions: U Aquire lands in ACECs: Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Retain BLM ownership in PH w/exceptions beneficial to SG: Y; If offered, aquire lands benefitting SG habitat:Y; Lands retained under BLM management would not be converted for agriculture or urbanization: Y | Recommend that no relinquishment or land exchanges be permitted that would result in urban development in PH/GH. |
| | | Which (if any) of Options 1 - 5 were applied? | None | 2?, 3?, 5? | 2?, 3?, 5? | 2?, 3?, 5? | |
| **Infrastructure - YW = Y; BM = L** | Avoid development of infrastructure within PACs | No new development of infrastructure within PACs. Designated, but not yet developed infrastructure corridors should be re-located outside of PACs unless it can be demonstrated that these corridors will have no impacts on the maintenance of neutral or positive sage-grouse population trends or habitats. New infrastructure should be avoided where individual state plans have identified key connectivity corridors outside of PACs. | No PACS: N; Minor ROW exclusion / avoidance: N; No TM planning: N; Motorized travel limited to existing roads and trails: Y?; Collocate ROWs when possible:U; | **3% dist. objective apply?:U; 70% SB objective apply?: U; New ROW excluded in PH, avoided in GH:Y**; In PH within ROW corridors new ROWs may be collocated only if the footprint of the project can occur w/in the existing disturbance in the auth. ROWs: Y. Where new ROWs associated with existing rights are required, collocate new ROWs within existing ROWs or where it best minimizes SG impacts: Y. Use existing roads or realignments to access existing rights not yet developed or build required road to the minimum standard necessary and add surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3% for that area, then evaluate and implement additional effective mitigation on a case-by-case basis to offset the resulting loss of SG habitat:Y. Collocate in GH | **New ROW excluded in PH / GH:Y;** In PH/GH within ROW corridors new ROWs may be collocated only if the footprint of the project can occur w/in the existing disturbance in the auth. ROWs: Y. Where new ROWs associated with existing rights are required, collocate new ROWs within existing ROWs or where it best minimizes SG impacts: Y. Use existing roads or realignments to access existing rights not yet developed or build required road to the minimum standard necessary and add surface disturbance to the total disturbance in the priority area. If that disturbance exceeds 3% for that area, then evaluate and implement additional effective mitigation on a case-by-case basis to offset the resulting loss of SG habitat: Y.Complete PH/GH TM planning w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails: Y?; 4-mi lek buffer for new roads: Y; In PH/GH limit | **New ROW avoided in PH and in 6% (7245 ac) of GH:U?;** Where ROWs required in PH, collocate or place where best minimizes impacts on SG and SG habitat: Y?; Collocate in GH where possible:U?; New ROW allowed in GH with appropriate minimization:U; PH TM planning "should be" completed w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails, BLM admin off-road use allowed: Y?; During TM planning in PH limit nec. roads to re-alignments, minimize upgrading, restore undesignated: Y?; Eval./enact opp. to remove, bury, modify powerlines in PH: Y?; | Unspecified as to when a ROW would be required in PH under Alt D (valid existing right - or other reason?) Under D, new ROW should be avoided in PH unless effects to GSG are neutral or beneficial - this should be specified. Unclear (Table 2-4 vs Table 4-3) whether collocation in GH is required in all cases for Alt D. No RDFs or BMPs are included in App. C or D for ROW projects including powerlines, pipelines, and cell towers. Such measures should be included, should include reference to appropriate buffers, and explicitly be tied to compliance with RMP SG goals and objectives, monitoring, and adaptive management. Timeframe for TM planning under D should be specified ("shall" vs "should" be completed). Unclear why mitigation is only referenced for B and C, but not D. All action alts should follow mitigation strategy in App G. Unclear how Alt. B and C 3% surf. disturbance "cap" for roads or Alt B 3% disturbance and 70% SB objectives would be met/implemented (no analysis). |

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| | | | | where possible:Y; Complete PH TM planning w/in 5 yrs of ROD: U; Motorized travel limited to existing roads and trails: Y?; In PH limit nec. roads to re-alignments, minimize upgrading, restore undesignated: Y; Eval./enact opp. to remove, bury, modify powerlines in PH: Y? | nec. roads to re-alignments, minimize upgrading, restore undesignated: Y; Eval./enact opp. to remove, bury, modify powerlines in PH/GH: Y?; | | |
| | | Where state sage-grouse management plans provide an effective strategy for infrastructure those strategies should be implemented. In all other situations the conservation options in the COT report should be considered. | State plan in process | State plan in process | State plan in process | State plan in process | Selected alt should be consistent with the revised MT state plan, when completed (provided State plan is consistent with COT Report), or provide measures for achieving consistency. |
| | | Which (if any) of Options 1 - 10 were applied? | Alt A: 5? | Alt B (PH): 1, 2a?, 5, 10; | Alt C (PH/GH): 1, 2a?, 5, 10 | Alt D (PH): 1?, 2a?, 5, 10, | RDFs or BMPs should be included in App. C and D for ROW projects including powerlines, pipelines, and cell towers. Such measures should include reference to appropriate buffers, and explicitly be tied to complience with RMP SG goals and objectives, monitoring, and adaptive management. |

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| **Fences (no ratings)** | Minimize the impact of fences on greater sage-grouse populations | No conservation measures specified. Are locally-derived actions/measures consistent with conservation objective? | Some general measures, but none specific to PH, GH, or SG: N | In PH, design new range improvement structures and supplements to conserve, enhance, or restore SG habitat: Y?; Remove, modify, or mark fences in high risk areas within PH, based on proximity to lek, lek size, and topography: Y? . | No considerations for new range improvement structures: N; Remove, modify, or mark fences in areas of moderate or high risk of SG strikes within SG habitat, based on proximity to lek, lek size, and topography (Christiansen 2009; Stevens 2011): Y . | In PH, design new range improvement structures and supplements to conserve, enhance, or restore SG habitat: Y?; During the allotment evaluation and watershed planning process, Identify and mark fences in high risk areas within PH, based on proximity to lek, lek size, and topography: U. | Approximate timelines / targets should be identified. 10 yrs is too long for evaluation under Alt D; problem structures should be addressed sooner if possible. No SG considerations for new fences under Alt. C. FWS recommendation for all alts. is to avoid new fencing within 1 km of an active or historic lek. |
| | | Which (if any) of Options 1 - 3 were applied? | None | 1? 2? 3? | 1? 2? | 1? 2? 3? | |

| [1]Threat Ratings from COT Report | [2]Subjective Consistency (with COT Report) Rating Continuim |
|---|---|
| **Y: Pres. and Widespread** | **High Concern &/or Very Low Consistency** |
| **L: Pres. and Localized** | ↑ |
| **N: Not Known to be Pres.** | **Lower Concern &/or Higher Consistency** |
| **NA** | **NA** |

**[3]Action Abbreviations**

ACEC = Area of Critical Environmental Concern

BMPs / RDFs = Best Management Practices / Required Design Features

FWP = Montana Fish, Wildlife & Parks

GH = General Sage-Grouse Habitat

O&G = Oil & Gas

APLIC = Avian-Powerline Interaction Committee

PH = Priority Sage-Grouse Habitat

RA = Sage-Grouse Habitat - Restoration Areas

SG = Sage-Grouse

TM/OHV = Travel Management/Off-Highway Vehicle

WE = Wind Energy

RE = Renewable Energy

ROD = Record of Decision

COT = Conservation Objectives Team

N = No, action appears to be inconsistent with COT Report objective

NA = Not Applicable

PAC = Priority Areas for Conservation

P* or #* = Potentially consistent with COT Report objective if specifically applied to meet EIS/RMP SG Purpose & Need, Goals, and Objectives

U = Unknown / unclear from EIS as to whether action is consistent with Cot Report objective

Y = Yes, action appears to be consistent with COT Report objective

RHS = Rangeland Health Standard