From:	Matt Kales
To:	Noreen Walsh
Subject:	RE: GrSG: Additional info re: JBLM YTC
Date:	Friday, May 01, 2015 9:57:47 AM

Good call with Terry and WA F&WO leadership just now. R1 will provide a turnkey BP on JBLM-YTC to us for HQ/DOI on Monday.

From: Noreen Walsh [mailto:noreen_walsh@fws.gov]
Sent: Friday, May 01, 2015 7:40 AM
To: Matt Kales
Subject: RE: GrSG: Additional info re: JBLM YTC

NPC cancelled

Noreen Walsh
Regional Director
Mountain-Prairie Region
U. S. Fish and Wildlife Service
303 236 7920

From: Matt Kales [mailto:matt_kales@fws.gov]
Sent: Friday, May 01, 2015 7:34 AM
To: Noreen Walsh
Subject: Fwd: GrSG: Additional info re: JBLM YTC

FYI - Gonna brief Terry and her folks at 930 our time. Will step off NPT call of it's still going. If it's over, please join if you like. Thanks.

Begin forwarded message:

> **From:** Theresa Rabot <theresa_rabot@fws.gov>
> **Date:** May 1, 2015 at 7:27:11 AM MDT
> **To:** Matt Kales <matt_kales@fws.gov>
> **Cc:** Michael Thabault <michael_thabault@fws.gov>, Eric Rickerson <eric_rickerson@fws.gov>, Bridget Moran <bridget_moran@fws.gov>, Richard Hannan <richard_hannan@fws.gov>
> **Subject: RE: GrSG: Additional info re: JBLM YTC**
>
> Let's shoot for 8, rest of the day is pretty shot
>
> 877.693.7017
> 896726
>
> Thanks

From: Matt Kales [mailto:matt_kales@fws.gov]
Sent: Friday, May 01, 2015 6:25 AM
To: Theresa Rabot
Cc: Michael Thabault; Eric Rickerson; Bridget Moran
Subject: Re: GrSG: Additional info re: JBLM YTC

Great, thanks. Let me know a good time to call/you all this morning.

On May 1, 2015, at 7:23 AM, Theresa Rabot <theresa_rabot@fws.gov> wrote:

> we can do that. I think Richard and I need a download from Noreen pretty quickly
>
> **From:** Matt Kales [mailto:matt_kales@fws.gov]
> **Sent:** Thursday, April 30, 2015 2:57 PM
> **To:** Theresa Rabot
> **Cc:** Michael Thabault
> **Subject:** FW: GrSG: Additional info re: JBLM YTC
> **Importance:** High
>
> Based on what Noreen relayed from HQ/DOI, JBLM YTC is likely to be a big focus as this issue unfolds, so if you concur, it may make sense for WA F&WO to start drafting a background BP that synthesizes/summarizes the status of GrSG on site; history of cooperation between DoD-FWS; and any other relevant info so we have it handy. I've got lots of stuff from Jessica and Co. dating back to 2013 but think it would be good for them to crystallize that info in the context of the current debate. Let us know what you think. Thanks.
>
> Matt
>
> **From:** Matt Kales [mailto:matt_kales@fws.gov]
> **Sent:** Thursday, April 30, 2015 3:51 PM
> **To:** Gary Frazer
> **Cc:** Noreen Walsh; Michael Thabault; Nicole Alt; Richard Hannan; Theresa Rabot; Ren Lohoefener; michael_fris@fws.gov; Mary Grim
> **Subject:** GrSG: Additional info re: JBLM YTC
> **Importance:** High
>
> Gary,
>
> Noreen indicated HQ/DOI is seeking additional details re: JBLM YTC in Washington, since that installation appears to be central to the current DoD-GrSG dialogue. Thanks to Terry and her folks in the WA F&W Office, we are sending the below information, which is organized as a point-by-point response to the recent (04/13/15) USA presentation on GrSG management at JBLM (attached). In summary, the presentation

significantly misrepresents FWS' position and associated recommendations.

Terry's folks have a wealth of information available on this topic, including comprehensive background on GrSG conservation issues at JBLM, if we need to drill down further, so please let us know what else we can do to inform the conversation. Matt

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FWS staff, in reviewing the Army presentation, determined that the concerns Army cites represent FWS recommendations of one form or another (i.e., a conservation recommendation in consultation or NEPA comments where we recommended a change or clarification). However, they do not accurately reflect what FWS recommended. Their interpretation in many instances was far broader, more extreme, and expanded to areas/ranges we did not discuss.

Point by point responses to presentation (bullets from slide 9):

1. We have on several occasions made the recommendation to expand buffer protection around leks. The 2010 Grow the Army (GTA) consultation (informal) recommended buffer expansion to 5 km. The 2013 NEPA comments on the Multipurpose Machine Gun Range (MPMGR) recommended expansion to 4 miles (6.4 km). These recommendations are in line with the current science that informs the average distance between a lek and nest sites (guiding the size of the buffer).

2. While we did recommend a seasonal restriction of Feb 1-June 15 on range 5 in the MPMGR NEPA comments, we did not discuss the need for this at any other ranges. This is very different than the "eliminate all training" statement Army made in the presentation and so broadly applied to other ranges.

3. We have made numerous recommendations regarding enhanced wildland fire management, but our comments were embodied in the YTC Integrated Wildland Fire Management Plan. The implementation of this plan was a conservation measure (i.e., part of their proposed action) for the GTA consultation.

4. In the NEPA comments for MPMGR, we made a

recommendation to monitor for sage grouse nesting or presence at range 5. This was because this range overlapped with a lek. We did not discuss real-time, range fans, or project footprints. This bullet is very broad and implies application across the installation, which is incorrect.

5. The 3:1 mitigation ratio was discussed in the 2012 Tactical Unmanned Aircraft System (TUAS) NEPA process. We did not provide NEPA comments on this EA, but did answer a phone call from YTC (Colin Leingang). Colin thought there should be some sort of mitigation, not unlike for when wetlands are filled/removed. Colin asked what I thought would about a 3:1 ratio and we indicated that appeared reasonable, absent a comprehensive body of literature to guide us (the COT report and Mitigation Framework were not developed at the time). We view this discussion not as a recommendation, but rather FWS simply informally agreeing with the Army's proposed ratio in their NEPA analysis.

Lastly, we believe the decision to conference on candidate species is driven by Army's responsibilities under the Sikes Act and development of their INRMP (which evaluates impacts to all species, not just those that are listed). Importantly, Army requested conferencing and we obliged, despite it being discretionary.

Matt Kales, Senior Advisor 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