From: Jeri_Wood@fws.gov
To: Tyler_Abbott@fws.gov
Cc: Julie_Reeves@fws.gov; Lynn_Gemlo@fws.gov
Subject: Re: Gateway West FEIS - draft outline sage grouse mitigation plan
Date: Wednesday, October 31, 2012 1:05:49 PM

Tyler - My thoughts as well and I agree that is not our job. Having said that though, I did provide Julie with some comments on the plan. I am especially concerned that there is no acknowledgement of indirect affects and that the only mitigation we can expect is whatever is defined in the HEA (or mainly direct effects). I also take issue with the use of conservation easements with no real sideboards such as the site is in imminent danger of development or if not, that the easement will include restoration/enhancement before it can "count" towards mitigation (just preserving is not mitigation for the action). At some point, I would also like to talk to you about the juniper removal/fire issue. I have been talking to some of the folks here in BLM and I think that fire could play a positive role if done properly and in combination with mechanical removal. Maybe at some point we can discuss further. Jeri

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May your trails be crooked, winding, lonesome, and dangerous, leading to the most amazing view. May your mountains rise into and above the clouds. - E Abbey
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Tyler Abbott/R6/FWS/DOI

Tyler Abbott/R6/FWS/DOI
10/31/2012 12:29 PM

To Julie Reeves/R6/FWS/DOI@FWS
cc Jeri Wood/ESBO/R1/FWS/DOI@FWS, Lynn Gemlo/R6/FWS/DOI@FWS
Subject Re: Gateway West FEIS - draft outline sage grouse mitigation plan

This looks like an "approach to" a mitigation plan or strategy, but is not a mitigation plan (in my mind). While this "framework" of how the mitigation will be approached is more than what we've seen before, I think all the relevant specifics are lacking.

I have a call into Chris Keefe here at BLM regarding what comments he has provided or will provide-- last week when we talked about this he also felt like all the needed details were lacking and was going to comment accordingly.

I don't want to spend a lot of time on this because we prepared a 7-page mitigation guidance document for the project proponents to follow. I don't have the time or inclination-- and I

don't believe it's our job-- to flesh-out a mitigation plan for them.

Jeri, I'd like to know your thoughts on this.

Thanks

Tyler Abbott
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Julie Reeves/R6/FWS/DOI

Julie Reeves/R6/FWS/DOI
10/30/2012 02:17 PM

To Jeri Wood/ESBO/R1/FWS/DOI@FWS, Tyler Abbott/R6/FWS/DOI@FWS, Lynn Gemlo/R6/FWS/DOI@FWS
cc
Subject Gateway West FEIS - draft outline sage grouse mitigation plan

Hi, Jeri, Tyler, and Lynn,

Have you reviewed Appendix C-3, the "Greater Sage-grouse Avoidance, Minimization, and Mitigation Measures" section, of the admin FEIS for Gateway West? I apologize for not finding this part of the document sooner.

Could you please take a quick look and see if this draft outline is beginning to address our recommendations for a mitigation plan following the results of the HEA? Any comments you could provide would be helpful.

Thanks a ton!
[attachment "Appendix C_Part2.pdf" deleted by Tyler Abbott/R6/FWS/DOI]

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We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect. ~Aldo Leopold, A Sand County Almanac