From:	Linner, Susan
To:	Ireland, Terry
Cc:	Patty Gelatt; Creed Clayton; Pat Deibert
Subject:	Re: GRSG DEIS Comment Cover Letter
Date:	Monday, November 18, 2013 2:35:33 PM
Attachments:	GRSG DEIS Summary 11-18-13 clean SL.doc

Here is a revised version for today's discussion, with my edits.

Susan

On Mon, Nov 18, 2013 at 2:16 PM, Ireland, Terry <terry_ireland@fws.gov> wrote:

> I have attached one version with comment bubbles still attached for Patty and Susan's quick input if possible. If not possible I have also attached a version without bubbles. The larger comments include both those we think are high priority (red comments) and things we might not think are so big a deal but the public may view as a concern/issue. Am going to clean up the detailed comment document (removing comment bubbles) and will send shortly.
>
> Terry Ireland
> Fish and Wildlife Biologist
> U.S. Fish and Wildlife Service, Ecological Services
> 764 Horizon Drive, Building B
> Grand Junction, Colorado 81506
> Terry_Ireland@fws.gov
> Phone: 970-243-2778 ex. 16
> FAX: 970-245-6933

--

Susan Linner, Field Supervisor
Colorado Ecological Services Office
134 Union Blvd., Suite 670
PO Box 25486 DFC
Denver, CO 80225
phone: 303-236-4774
fax: 303-236-4005

To: Northwest Colorado District Manager, BLM, Grand Junction,

From: Colorado Field Supervisor

Subject: Fish and Wildlife Service Comments on August 2013 Northwest Colorado Greater Sage-grouse Public Draft Land Use Plan Amendment and Environmental Impact Statement

The Colorado Ecological Services Field Office has reviewed the subject Draft Land Use Plan Amendment and Environmental Impact Statement (DEIS). Specific comments to the DEIS are attached with larger comments outlined below. Additionally, a matrix comparing conservation measures in the DEIS to Conservation Objective Team (COT) Report conservation objectives, measures, and options is attached. Our comments have been arranged in the order of categories in the Final COT Report (February 2013) and as such may be directed at more than one BLM/USFS Program area. Although many conservation objectives, measures, and options have been addressed in the DEIS, we recommend that the Final EIS incorporate our comments and additional objectives, measures, and options following the Final COT Report.

In Colorado, habitat fragmentation (primarily as a result of infrastructure related to energy development and urbanization), fluid mineral development, and lack of adequate regulatory mechanisms are the primary threats to the greater sage-grouse (*Centrocercus urophasianus*) (GRSG) recognized by the Service. Our comments address these primary threats, as well as other threats, and provide more comprehensive conservation of the sage-grouse by suggesting changes to conservation measures under the various BLM/USFS Programs. Changes to the measures in the DEIS include wording changes to Alternative D, or insertion of conservation measures from Alternatives B and C into Alternative D. Therefore, we expect that the proposed alternative in the FEIS will be a combination of Alternative B, C, and D.

Larger comments or issues include:

1. Year-round protection for all leks in all designated habitat (ADH, which includes preliminary priority habitat (PPH), preliminary general habitat (PGH), and linkage corridors (C)). This would apply to fluid minerals, rights-of-way, mining, and other significant surface disturbing actions. The commonly accepted buffer distance for lek protection is 0.6 mile.

2. Disturbance cap application (3 or 5%) to all habitats used by GRSG, not just the sagebrush habitat types identified in the EIS. The disturbance cap would then be applied to specific grasslands, meadows, and shrub types used by GRSG.

3. Provide a justification in the FEIS for the 5% disturbance cap under Alternative D. We are also concerned about how the cap will be applied, given the number of potential exemptions, and ensuring that monitoring is adequate to measure the disturbance.

4. A density cap for fluid mineral development. An average density of no more than 1 disturbance per 640 acres is a level of disturbance that can be compatible with a sustainable GRSG population.

5. Establishment of a minimum threshold of reclamation success based on GRSG habitat structure in the FEIS in order to clarify when the reclaimed disturbance could be taken out of the total disturbance for monitoring of the disturbance cap.

6. A justification for use of the following paraphrased conservation measure in the DEIS: 'in each of the 21 CO management zones for ADH of maintaining at least 70% of ecological sites in 12% canopy WY big sagebrush or 15% canopy of mountain sagebrush with a 30% disturbance cap from loss of sagebrush from all causes (anthropogenic, wildfire, plowed field agriculture, and vegetation treatments, mappable stands of cheatgrass and PJ, but <u>not</u> irrigated meadows'.

7. Inclusion of a caveat under Alternative D paraphrased here states that the DEIS will: 'consider GRSG habitat requirements in conjunction with all resource values managed by BLM/USFS, and give preference to GRSG habitat unless site-specific circumstances warrant an exemption'. Please identify the potential exemptions in the FEIS. Furthermore, the FEIS needs to state that reporting of exemptions or exceptions will be done.

8. Completion of a monitoring framework such as the Habitat Assessment Framework under development.

9. Insertion of conservation measures to limit road density in GRSG habitat and distance from leks.

DRAFT