From:	Linner, Susan
To:	Ireland, Terry
Cc:	Patty Gelatt; Pat Deibert; Creed Clayton
Subject:	Re: GRSG DEIS documents
Date:	Monday, November 25, 2013 8:16:46 AM
Attachments:	DEIS BP 11-24-13 (1).docx

Terry,
I went through the BP quickly and tried to make some of the changes we discussed. It's probably not ready to be finalized yet, but you should get the gist of what I was trying to do. I'll be back in the office around 3:00, but will be reachable via my cell phone.

Susan

On Sun, Nov 24, 2013 at 11:56 PM, Ireland, Terry <terry_ireland@fws.gov> wrote:

> I've attached the track changes and clean versions of the comment letter, cover letter summarizing larger issues, and draft briefing paper. One change of note; after reviewing a couple recent articles on disturbance I decided to recommend the 3% cap rather than just requesting justification of the 5% cap. I still left the 30% cap issue open for justification and have tentatively stated it's ok with us in the BP. It's a way to account for wildfire and other (arguably) non-anthropogenic features but still maintains the 5% (or maybe 3%) disturbance cap. I just now realized that it is also an attempt to put criteria on NTT measures (since the measure also involves canopy covers) such as maintaining or restoring native plants and landscape patterns. I will send the matrix after I do a little more work on it.
>
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November 25, 2013

INFORMATION MEMORANDUM FOR THE REGIONAL DIRECTOR

FROM: Colorado Field Supervisor, Ecological Services

SUBJECT: Comments on Northwest Colorado Greater Sage-grouse Draft EIS

I. BACKGROUND

As part of the range-wide BLM and USFS effort to amend or revise their land use plans for greater sage-grouse conservation the Northwest Colorado Greater Sage-grouse Public Draft Land Use Plan Amendment and Environmental Impact Statement (DEIS) was issued in August 2013. The Fish and Wildlife Service is a cooperating agency in the process and is providing comments. We met with CPW to discuss our preliminary comments on November 7, and with BLM on November 18.

II. POTENTIAL ISSUES

The largest threats to greater sage-grouse in Colorado are habitat fragmentation from numerous activities, fluid mineral development, and lack of regulatory mechanisms. The Colorado Ecological Services office has drafted comments to the DEIS and provided a summary of more important issues in our draft cover letter. Alternative D is the preferred alternative. Despite issues outlined below, the Colorado Ecological Services Office thinks most of the conservation measures under Alternative D are acceptable with our modifications and with additions from Alternative B or C.

Two specific issues were raised in our discussion with BLM as being potentially in conflict with the NTT and with other BLM EIS efforts. These issues are the 3% (NTT standard) vs. 5% disturbance cap, and mischaracterization of an NTT conservation measure requiring that 70% of land cover provide adequate habitat for the species' needs. We will recommend that BLM use the 3% cap standard and provide more detailed justification for using the 30% non-habitat criteria as a disturbance cap. CPW is strongly in favor of a 3% cap.

III. DISCUSSION

1. Based on recent publications, the Colorado Field Office plans to recommend that no higher than a 3% anthropogenic disturbance cap be used. This disturbance cap was recommended in the NTT Report and is part of Alternative B which follows NTT Report recommendations. In previous discussions with the BLM and in comments on the Cooperating Agency Draft of the DEIS we only requested a justification in the FEIS for the 5% disturbance cap under Alternative D but did not recommend a 3% cap. To date it has not been stated by BLM/USFS how the 5% cap could be biologically justified.

2. It may be difficult to entirely exclude or avoid projects in GRSG habitat but we are concerned about maintaining an acceptable level of anthropogenic disturbance given the number of potential exemptions under conservation measures in Alternative D.

3. Even though additional, effective mitigation is planned under conservation measures in Alternative D, if the 3 or 5% disturbance cap limit is reached, mitigation may take many years to become functional GRSG habitat. Therefore, mitigation acreage should not be allowed to be removed from the disturbance cap calculations before functional GRSG habitat is restored and functional GRSG habitat needs to be defined.

4. The Colorado Field Office thinks that a conservation measure under Alternative D to retain in sagebrush at least 70% of ecological sites in each Colorado management zone and adding a 30% disturbance cap to include all causes (anthropogenic, wildfire, plowed field agriculture, and vegetation treatments, mappable stands of cheatgrass and pinyon-juniper, but not irrigated meadows) is a misuse of the NTT standard~~acceptable for Colorado.~~ The 30% was not meant as a disturbance criteria, rather as an indication that on a landscape scale, there are areas within sagebrush habitat that do not necessarily meet the criteria of habitat, and to limit those areas to 30&%. ~~Our rationale is that the anthropogenic disturbance cap will still be in place and the 30% cap accounts for (arguably) non-anthropogenic and non-structural issues such as wildfire, cheatgrass and pinyon-juniper occurrence but these issues are not major issues in Colorado. Conservation measures to address all of the categories under the 30% disturbance cap are included in Alternative D. However, w~~We ~~are still~~ request~~ing~~ that use of this conservation measure as a disturbance cap be justified in the FEIS including a description of supporting information. Furthermore, if the conservation measure remains in the FEIS there needs to be a clarifying statement added to it that no new anthropogenic disturbance will be authorized if the 30% cap is reached (even if fire, for example, is the primary reason the cap is reached).

Comment [SL1]: Move this up to number 2

5. An average density of no more than 1 disturbance per 640 acres for fluid mineral development (e.g. one pad or one compressor station or one centralized water facility, etc.) is being recommended.

6. 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.

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

8. Year-round protection within 0.6 miles for all leks in any habitat type 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. This does not preclude additional protections of PPH, PGH, or linkage corridors through other conservation measures.