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| **From:** | Defreese, Amy |
| **To:** | Rigtrup, Keith |
| **Cc:** | Ben Gaddis |
| **Subject:** | Re: greater sage-grouse mitigation plan - comments |
| **Date:** | Thursday, May 02, 2013 8:47:55 AM |
| **Attachments:** | AltonEIS_DraftSage-grouseMitigPlanIter2_comment form2013_04_16-30_Defreese.doc |

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Hi Keith and Ben,
Thanks for the extension in time. I sent these last evening, but I don't think they went through to you. Anyway, this is a somewhat incomplete set of comments ... this week has been nutty and I didn't get to spend as much time on the document as I would have liked. I may have some additional time this morning and if so, I'll add to these comments in case you can consider them.

Thanks!
Best regards,
Amy

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On Tue, Apr 30, 2013 at 8:11 AM, Rigtrup, Keith <krigtrup@blm.gov> wrote:

> Amy, that would be fine, thanks for letting us know, Keith.
>
> On Mon, Apr 29, 2013 at 5:16 PM, Amy Defreese <amy_defreese@fws.gov> wrote:
>
> > Hi Keith and Ben,
> >
> > I'm wondering if I could have an extra day to get comments to you for the gsg mitigation plan for Alton? Would that be possible? I'm thinking by 5 pm on Wednesday the 1st.
> >
> > Thanks for your consideration –
> >
> > Amy

*Amy Defreese, Ecologist*

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Keith Rigtrup

District Planner

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*Alton Coal Tract Lease by Application Greater Sage-grouse Mitigation Plan DRAFT*
*April 2013*

***Please Read:*** *Enter comments in the table below. The* ***Section #/Title*** *column is important because page and line numbers shift once revisions begin, but section numbers and titles change less often. In the* ***Page #*** *and* ***Line #*** *columns, write ONLY the NUMBER of the page and the line within the page. Also, please put your name on every comment so if we have questions, we can call you. Please avoid putting comments such as "see above." It is better to paste the same comment in another row. Submit your comments to Keith Rigtrup (krigtrup@blm.gov), Lisa Church (lchurch@blm.gov), and Ben Gaddis (bgaddis@swca.com, AltonCoalEIS@swca.com). Based on the current schedule the deadline for comments is April 30, 2013.*

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| Amy Defreese - FWS | 1. Background | 1 | 28-34 | I think it would be informative to readers to briefly describe the progress of the Coal Hollow Mine in meeting its minimization and mitigation goals. I don't think the mitigation for this project should be developed without consideration of Coal Hollow's impacts, mitigation, and successes/failures. As an aside, the latest progress report for Coal Hollow (2012) makes some large statements about the extent of the population in the area (the authors maintain that the Ford Pasture area is now the southern-most extent of the population). If this is true, it should be considered in the NEPA document (the Affected Environment, impact analysis, and avoidance/minimization/mitigation measures). |
| | Figure 1 | 3 | | Recommend adding 1) the Coal Hollow tract to the map; and, 2) the latest DWR greater sage grouse occupied wintering and brood-rearing habitat polygons to this map for reference. Alternatively, provide a second Figure with this information. |
| | 2. Purpose | 5 | 20-22 | Now that the State of Utah has released its Final Plan for greater sage-grouse, I recommend citing it instead of the Governor's Working Group document. |
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| | 2. Purpose | 5 | 20-24 | Recommending stating specifically whether the Mitigation Plan Area only encompasses public land or whether private land within the Mitigation Plan Area also encompasses private land available for siting of compensatory mitigation projects. Ultimately, is there an option to site on private land? If so, it may be wise to develop different parameters. For example, a habitat treatment (with a conservation easement) on private land that precludes any future development may be more valuable than a habitat treatment on BLM land because it is unclear whether BLM will fully protect the treatment area from future development. |
| | 2.1 Terminology | 6 | 3-7 | The latest DWR maps that I have are dated March 2012. They demonstrate wintering habitat within the Mitigation Plan Area and a different acreage of brood-rearing habitat than what you have described here. I believe the DEIS for the project also references wintering habitat within and adjacent to the coal tract (page 3-89). Has this changed? Recommend citing the DWR data that you are using if it has changed. Ultimately, this point should be resolved so that we know (are in agreement about) the impacts. |

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| Amy Defreese - FWS | 3. Guiding Regs | 7 | 6-13 | We understand that the purpose of the document is to describe the strategy for avoiding and reducing impacts, where possible, to the sage-grouse populations potentially affected by leasing and mining the Alton Coal Tract, *in accordance with guiding regulations*. One over-arching concern is that the project and greater sage-grouse mitigation plan falls short of meeting IM 2012-043. Given that Section 8 discloses we might lose the local population even with mitigation and reclamation, the Mitigation Plan doesn't 1) seem to comply with IM 2012-043 to "cumulatively maintain or enhance sage-grouse habitat" or 2) achieve its goal to "offset impacts related to mining the tract". |
| | 3. Guiding Regs | 7 | | Although not a Regulation per se, recommend referencing the Conservation Objectives Team Report recently finalized for greater sage-grouse. It includes specific information on the Panguitch management unit. |
| | 3.1 | 8 | 18-33 | An alternative to delaying project construction for want of NEPA analysis on mitigation projects, BLM could programmatically analyze a set of compensatory mitigation options (e.g. PJ removal, sagebrush enhancement, acquisition of conservation easements, etc.) |
| | 4.0 Goals | 9 | 3-4 | I don't know that it is possible to offset the loss of the local gsg population. Therefore, I recommend changing this bullet as follows (change in italics): Offset *habitat* impacts related to mining the tract, as identified through the EIS process, by implementing habitat management and enhancement projects in the mitigation plan area. |
| | 5.0 | 10 | | Recommending providing an additional paragraph that describes (to) which of the factors causing population decline this project contributes (i.e. habitat loss, habitat fragmentation, and alteration of habitats by invasive species). |
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| | 8.0 | 25 | 20-27 | Greater sage-grouse appear to avoid structures (i.e. roads, tall structures, transmission lines, oil/gas wells, coalbed methane developments) on the landscape (LeBeau,2012; Hagen et al., 2011, Pruett et al. 2009; Braun 1998; Ellis 1985; Hagen et al. 2011, Aldridge and Boyce 2007; Holloran 2005; Doherty et al. 2008, Knick Hanser et al 2013). This impact needs to be fully disclosed relative to avoidance by the bird and subsequent loss of habitat. The compensatory mitigation package needs to account for this impact. One method to determine habitat loss adjacent to transmission lines is to determine the acreage of occupied habitat within 0.6 miles of the line and consider it "habitat lost" to the birds for the life of the transmission line. |
| Amy Defreese - FWS | | | | |
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| Amy Defreese - FWS | | | | |
| Amy Defreese - FWS | 9.0 | 27 | 11-13 | I recommend providing more specific documentation that habitat improvement projects in the tract have been successful. What were they and how was success determined? Was success determined by use of the treated area by greater sage-grouse? Recommend putting this information into Table 2 on page 31 as well. Ultimately, We maintain that success for mitigation projects must be tied to use of the treated areas by greater sage-grouse. It is hard to argue that greater sage-grouse will benefit otherwise. |
| Amy Defreese - FWS | | | | |
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