From: Amy Defreese
To: Tyler Abbott
Cc: Julie Reeves
Subject: RE: migratory bird memo-- 3rd Time"s a Charm!
Date: Friday, March 08, 2013 1:35:29 PM

That is great … thanks to both of you for putting this together!

Amy Defreese, Ecologist
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Email: amy_defreese@fws.gov
Phone: 801-975-3330 x 128

From: Abbott, Tyler [mailto:tyler_abbott@fws.gov]
Sent: Friday, March 08, 2013 12:02 PM
To: Amy Defreese
Cc: Julie Reeves
Subject: Re: migratory bird memo-- 3rd Time's a Charm!

OK, I've modified the language in the second half of the first paragraph to read as follows:

...For example, we understand that Rocky Mountain Power will be working to develop a habitat equivalency analysis (HEA) as a method to quantify the permanent or interim loss of habitat services from project-related impacts on greater sage-grouse and as a means with which to develop a mitigation plan for these habitats. We also understand that Rocky Mountain Power has an Avian Protection Plan in place. While the Service believes that the greater sage-grouse HEA generally addresses loss of habitat services to other sage-steppe avian species, we do not believe that these measures adequately address all of the potential impacts that this project may have on migratory birds and their habitats. Indeed, as the sage-grouse HEA and APP pertain to migratory avian species in general, they should each be considered one part of broader migratory bird conservation strategy.

On Fri, Mar 8, 2013 at 11:27 AM, Amy Defreese <amy_defreese@fws.gov> wrote:
Thanks Tyler and Julie! My only comment is that I didn't realize the RMP HEA is proposed to include all sage/steppe species. I thought it was specific to greater sage-grouse. I understand that whatever compensatory mitigation may come out of the Framework could be used for sage/steppe migratory birds, but that seems like a different sentiment than telling BLM that we they don't need to consider sage/steppe migratory birds in future development of a migratory bird conservation plan.

Communicating by email is tough. I've gathered that there seems to be some reluctance to ask BLM to consider all migratory bird habitats in the migratory bird conservation plan. I don't understand where that reluctance originates which contributes to my perspective on the content of the memo.

As I read it, the goal of the memo is to request that BLM require RMP develop a bird conservation plan that incorporates compensatory mitigation for migratory bird habitat loss. I wish to avoid receiving a conservation plan that doesn't include consideration of sage/steppe habitat. If that is a likely outcome from your perspective, please let me know. Thank you!

Best regards,

Amy

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From: Abbott, Tyler [mailto:tyler_abbott@fws.gov]
Sent: Friday, March 08, 2013 10:30 AM
To: Julie Proell; Amy Defreese
Subject: Fwd: migratory bird memo

Forgot to add Amy's name in the CC

---------- Forwarded message ----------
From: **Abbott, Tyler** <tyler_abbott@fws.gov>
Date: Fri, Mar 8, 2013 at 10:28 AM
Subject: Re: migratory bird memo
To: "Reeves, Julie" <julie_reeves@fws.gov>

Julie and Amy, I made a couple of changes and now it reads as follows:

...For example, we understand that Rocky Mountain Power will be working to develop a habitat equivalency analysis (HEA) as a method to quantify the permanent or interim loss of habitat services from project-related impacts on sage-steppe species and as a means with which to develop a mitigation plan for these habitats. We also understand that Rocky Mountain Power has an Avian Protection Plan in place. The Service does not believe, however, that these measures adequately address all of the potential impacts that this project may have on migratory birds and their habitats.

The Service remains concerned that fragmentation within types of habitat not currently addressed by the sage-grouse HEA and loss of these habitats for utilization by migratory birds and raptors remain unaddressed. Executive Order 13186 (66 Fed. Reg. 3853, January 17, 2001), entitled "Responsibilities of Federal agencies to Protect Migratory Birds," states that "Each Federal agency taking actions that have, or are likely to have, a measurable negative effect on migratory bird populations is directed to develop and

implement …a Memorandum of Understanding (MOU) with the …Service that shall promote the conservation of migratory bird populations."

Are both good with this?

Thanks, Tyler

On Fri, Mar 8, 2013 at 10:00 AM, Reeves, Julie <julie_reeves@fws.gov> wrote:
Hi, Tyler,

If you have not signed and forwarded the letter on to Donna, would you consider making the changes that Amy proposes? Otherwise, we might think about asking Amy to submit her own letter from the UT FO.

Thanks!
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
Julie (Proell) Reeves
Fish and Wildlife Biologist (Energy)
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Julie_Reeves@fws.gov
~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
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

---------- Forwarded message ----------
From: **Amy Defreese** <amy_defreese@fws.gov>
Date: Fri, Mar 8, 2013 at 9:44 AM
Subject: migratory bird memo
To: Julie Proell Reeves <julie_reeves@fws.gov>, Tyler Abbott <tyler_abbott@fws.gov>
Cc: Creed Clayton <creed_clayton@fws.gov>

Hi Julie,
I provided contact information for Utah BLM and Utah Forest Service in comment bubbles in the document. I'd also ask you and Tyler to consider the change I proposed in the first paragraph, first sentence. It is as follows:

The Service believes that ~~the HEA being conducted within the sage-steppe habitat for the greater sage-grouse may be a usable mechanism to address potential impacts to migratory birds occupying these habitats.~~through the greater sage-grouse Framework, Rocky Mountain Power may develop compensatory mitigation proposals that will serve to benefit sagebrush/steppe migratory bird species.

I think this addresses my comments and Creed's, and it is a more accurate statement of the Utah FWS position. If for some reason this isn't agreeable to you and Tyler, I'd suggest removing any reference to the greater sage-grouse HEA. It doesn't really add much value to the memo as it seems like the main point of the memo is that we would like to see them conduct an impact analysis for migratory birds and then develop and implement a compensatory mitigation plan for habitat loss.

Give me a call if you'd like to discuss! I heard your voice mail that you are at home today. I don't have that number.

Thanks!
Amy

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