From:	Alex Schubert
To:	Mark Sattelberg
Subject:	RE: Letters
Date:	Friday, October 18, 2013 3:31:56 PM
Attachments:	WY13CPA0282 Comments on Bighorn Basin RMP draft documents.PDF

Mark,
Here's one more. This one had not made it to the archive yet.

Alex Schubert
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
5353 Yellowstone Road, Suite 308A
Cheyenne, WY 82009
307-772-2374

From: Sattelberg, Mark [mailto:mark_sattelberg@fws.gov]
Sent: Friday, October 18, 2013 10:37 AM
To: Alex Schubert
Subject: Fwd: Letters

Can you pull together these letters, if we have any?

R. Mark Sattelberg
Field Supervisor
U.S. Fish and Wildlife Service
Wyoming Ecological Services Field Office
5353 Yellowstone Boulevard, Suite 308A
Cheyenne, Wyoming 82009

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---------- Forwarded message ----------
From: **Thabault, Michael** <michael_thabault@fws.gov>
Date: Fri, Oct 18, 2013 at 10:26 AM
Subject: Letters
To: Pat Deibert <pat_deibert@fws.gov>, Mark Sattelberg <mark_sattelberg@fws.gov>

Can you get me copies of letters we sent to BLM on their various WY plans to date. Noreen wants to pull language from them for a quote in the BLM news release. Thanks.

Michael Thabault
Assistant Regional Director

Ecological Services
U.S. Fish and Wildlife Service
Mountain Prairie Region
303-236-4210
michael_thabault@fws.gov

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
5353 Yellowstone Road, Suite 308A
Cheyenne, Wyoming 82009

In Reply Refer To:
06E13000/WY13CPA0282

SEP 30 2013

Memorandum

To: Field Manager, Bureau of Land Management, Worland Field Office, Worland, Wyoming

From: for Field Supervisor, U.S. Fish and Wildlife Service, Wyoming Field Office, Cheyenne, Wyoming

Subject: Comments on Bighorn Basin Resource Management Plan Draft Documents

This response is in reference to our review of the U.S. Bureau of Land Management's (BLM) documents relating to the Bighorn Basin Resource Management Plan (RMP). Notification of the publication of the Supplement to the Draft Environmental Impact Statement (SEIS) was received by our office on July 16, 2013. Notification of publication of the Draft Environmental Impact Statement (DEIS) was received on April 29, 2011. On September 6, 2011, the U.S. Fish and Wildlife Service (Service) submitted comments on the DEIS. The most recent version of the Draft Biological Assessment (BA) for the Bighorn Basin RMP was received by the Service in August 2011.

The SEIS and DEIS describe and analyze alternatives for the planning and management of public lands and resources administered by the BLM's Cody and Worland Field Offices. The planning area is located in north-central Wyoming and comprises approximately 5.6 million acres of land in Big Horn, Hot Springs, Park, and Washakie Counties. Within the planning area, the BLM administers approximately 3.2 million acres of surface land and 4.2 million acres of Federal mineral estate. Through this RMP, the BLM is revising the existing Cody RMP, Worland-Washakie RMP, and Worland-Grass Creek RMP under which the BLM's Cody and Worland Field Offices currently operate, respectively.

The Service provides recommendations for protective measures for threatened and endangered species in accordance with the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Protective measures for migratory birds are provided in accordance with the Migratory Bird Treaty Act (MBTA), 16 U.S.C. 703, and the Bald and Golden Eagle Protection Act (BGEPA), 16 U.S.C. 668. Wetlands are afforded protection under Executive Orders 11990

(wetland protection) and 11988 (floodplain management), as well as section 404 of the Clean Water Act. Other fish and wildlife resources are considered under the Fish and Wildlife Coordination Act, 48 Stat. 401, as amended (16 U.S.C. 661 *et seq.*).

After our review of the draft documents for the Bighorn Basin RMP, the Service has the following comments and up-to-date information when considering text revisions.

Comments on the draft documents

1. The BLM has stated "the Preferred Alternative for the RMP is found in the Alternative D of the DEIS" as an indication of the agency's preliminary preference. Therefore, the Service has mainly focused its review on the environmental consequences of Alternative D. The Service anticipates that the BLM will initiate formal section 7 consultation with the Service over this alternative.

2. The Service realizes that the BLM is currently continuing to prepare a draft BA that will analyze the impacts to threatened and endangered species from implementation of the Bighorn Basin RMP. The BLM should continue coordination with the Service until a final BA has been completed by the BLM and the Service has determined that it has received all information necessary to complete a Biological Opinion (BO) pursuant to section 7 of the ESA.

3. Regarding protective measures for the greater sage-grouse, the Service continues to favor the most extensive conservation measures present in the SEIS/DEIS. The Service realizes, however, that the BLM must balance conservation for greater sage-grouse with their multiple-use objectives for land management. Furthermore, the Service is pleased with the attempts of the BLM in Wyoming to adopt the Wyoming Core Area Strategy into their RMPs statewide. The Service believes the Wyoming Core Area Strategy can result in the long-term conservation of the greater sage-grouse in this state; and, consequently, contribute to reducing the need to list the species range-wide under the ESA. As you are well aware, actions outside of BLM-administered land in the range of the greater sage-grouse may influence any final listing decision.

4. It appears that at the time of publication of the SEIS, the BLM may have included a version of the adaptive management strategy for greater sage-grouse that has since become outdated. It is the understanding of the Service that an adaptive management component will be included in the Bighorn RMP Final Environmental Impact Statement (FEIS) and/or Record of Decision. We strongly encourage the BLM to adopt the adaptive management strategy for greater sage-grouse that is currently in progressive development at the national level and we urge the BLM to continue to coordinate with the Service over this matter.

5. Before completing the FEIS and BA for the Bighorn Basin RMP, the BLM should obtain an updated species list that encompasses the entire action area for the Bighorn Basin planning area. The Federal listing status may have changed for some species (e.g., grizzly bear, grey wolf) since the DEIS and latest draft of the BA were completed. The Service has recently transitioned to a new online program to deliver species lists: the Information, Planning, and Conservation (IPaC) system. To obtain a current list of endangered, threatened, proposed, and candidate species and their designated and

proposed critical habitat that occur in or may be affected by actions associated with your planning area, please visit our website at http://ecos.fws.gov/ipac/. This website will provide you with an immediate response to your species list request. The response will also include information regarding other Service trust authorities.

The Service realizes that the BLM is continuing to prepare the FEIS as well as the next draft of a BA for the Bighorn Basin RMP. The Service wishes to continue coordination efforts with the BLM until a complete and adequate BA and FEIS have been prepared. If you have questions regarding the comments or suggestions contained in this correspondence regarding the draft documents for the Bighorn Basin RMP, please contact Alex Schubert of the Cheyenne Field Office at (307) 772-2374, extension 238.

cc: BLM, Endangered Species Coordinator, State Office, Cheyenne, WY (C. Keefe)
(E-mail ckeefe@blm.gov)
BLM, Wildlife Biologist, Worland Field Office, Worland, WY (T. Stephens)
(E-mail t75steph@blm.gov)
WGFD, Statewide Habitat Protection Coordinator, Cheyenne, WY (M. Flanderka)
WGFD, Non-Game Coordinator, Lander, WY (B. Oakleaf)