From: Matt Kales
To: Noreen Walsh; Michael Thabault; Nicole Alt; Theresa Rabot; michael_fris@fws.gov
Cc: Pat Deibert; Jesse DElia; Mary Grim
Subject: RE: Prescribed Fire Drop-in Language
Date: Monday, March 02, 2015 12:06:48 PM

Folks: we discussed this on our coordinators call. Our perspective is the current language appears (a) to be potentially be weaker than the earlier language (pasted below); and (b) appears to not address the original NEPA issue that required BLM to develop this patch in the first place. If you all concur, we'd like to add this to the list of items we take up with BLM/FS at the staff level at our earliest opportunity. Please advise. Thanks.

Earlier language:

"Lands classified as priority habitat and general habitat (or habitat classification appropriate for the sub-region) for Greater Sage-Grouse will be retained in federal management unless: (1) the agency can demonstrate that disposal of the lands will provide a net conservation gain to the Greater Sage-Grouse or (2) the agency can demonstrate that the disposal of the lands will have no direct or indirect adverse impact on conservation of the Greater Sage-Grouse."

From: Matt Kales [mailto:matt_kales@fws.gov]
Sent: Monday, March 02, 2015 10:52 AM
To: Noreen Walsh; Michael Thabault; Nicole Alt; Theresa Rabot; michael_fris@fws.gov
Subject: FW: Prescribed Fire Drop-in Language

FYI for now. Our folks have this. We'll discuss on our 1100 call today and follow up with a recommendation to this group re: the land tenure language. Thanks.

From: Carman, Stephanie [mailto:scarman@blm.gov]
Sent: Monday, March 02, 2015 10:47 AM
To: Pat Deibert; Matt Kales
Cc: Glen Stein; Dillon, Madelyn -FS
Subject: Re: Prescribed Fire Drop-in Language

Pat and Matt -
We are awaiting feedback from FWS on their concerns with the below prescribed fire drop-in language. Please let us know.
Also, below is the proposed land tenure language which will be included in WY and CO regarding GHMA. (b) (5) [redacted]

For lands in General Habitat that are identified for disposal, the BLM will only dispose of such lands consistent with the goals and objectives of this plan, including, but not limited to, the land use plan objective to maintain or increase GRSG abundance and distribution.

Stephanie Carman
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scarman@blm.gov

On Tue, Feb 24, 2015 at 5:06 PM, Carman, Stephanie <scarman@blm.gov> wrote:
We are proposing the below addition to the prescribed fire drop-in language, which was inadvertently left off of the guidance. Thank you for bringing this to our attention. Please let us know if this addresses it adequately.

"If prescribed fire is used in Greater Sage-Grouse habitat with less than 12" of annual precipitation, the NEPA analysis for the Burn Plan will address:

- *why alternative techniques were not selected as a viable options;*
- *how Greater Sage-Grouse goals and objectives would be met by its use;*
- *how the COT Report objectives would be addressed and met;*
- *a risk assessment to address how potential threats to Greater Sage-Grouse habitat would be minimized.*

a) *Allow prescribed fire as a vegetation or fuels treatment in Wyoming big sagebrush sites or other xeric sagebrush species sites, or in areas with a potential for post-fire exotic annual dominance only after the NEPA analysis for the Burn Plan has addressed the four bullets outlined above. Prescribed fire could be used to meet specific fuels objectives that would protect Greater Sage-Grouse habitat in PHMAs (e.g., creation of fuel breaks that would disrupt the fuel continuity across the landscape in stands where annual invasive grasses are a minor component in the understory, burning slash piles from conifer reduction treatments, used as a component with other treatment methods to combat annual grasses and restore native plant communities).*

b) *Allow prescribed fire in known winter range only after the NEPA analysis for the Burn Plan has addressed the four bullets outlined above. Any prescribed fire in winter habitat would need to be designed to strategically reduce wildfire risk around and/or in the winter range and designed to protect winter range habitat quality."*

Stephanie Carman
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