

From: [DElia, Jesse](#)
To: [Deibert, Pat](#)
Cc: [Mary Grim](#)
Subject: Re: GRSG: BLM drop-in language again
Date: Friday, February 27, 2015 11:45:29 AM
Attachments: [summary of FWS review of BLM 020615 dropin language jd.docx](#)

Hi Pat.

Thanks for pulling this together. here are a few comments for your consideration.

On Fri, Feb 27, 2015 at 10:19 AM, Deibert, Pat <pat_deibert@fws.gov> wrote:

Hey folks - Hate to do this to you but I need a super quick review of the attached document. I was tasked late yesterday with summarizing and prioritizing the comments we provided on the drop-in language. I've not changed any of the comments you previously provided and reviewed, but rather pulled them out into a list for ease of reading. I was asked to identify those that we really felt necessary to have, and those that may not be worth additional efforts.

Please take a look and see if you agree with my list division. There is no order to the list other than I just added items in the order presented by BLM's original document. Leadership will be provided both the summary and the BLM document with our comments and edits.

Edits/corrections always welcome.

Of course, my RO is on my back to have this done, so if you can take a look ASAP I would be appreciative.

Thanks - p

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got leks?

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BLM Drop-in language review:

Overview: We have reviewed the draft drop-in language for the BLM planning efforts, focusing on consistency of the language with our mutual decisions at the Federal Family meetings. The following comments are arranged relative to our level of concern: Issues of primary concern are those we ~~feel~~ need to be strongly recommend address ~~ing~~ prior to finalization. We also provide some additional recommendations for your consideration to improve the clarity and strength of the guidance. The remaining items are recommendations we wish to be considered.

Issues of primary concern

- *Prescribed fire* – The proposed drop in language for this section conflicts with our recommendations to avoid all prescribed fire in sage-grouse habitat with <12 inches of annual precipitation. We have provided suggestions to modifying their language. One item that is not mentioned is cost – prescribed fire is often used as it is relatively inexpensive. Give that fire is the significant threat in the Great Basin, the expense of other treatments should not be a consideration in determining what treatment to use in those areas.
- *Recreation Facilities* – We are fine with the proposed drop-in language, but are concerned about the prioritization of management decisions. Specifically, new recreational facilities are prohibited in PHMA “...unless the development is required for visitor health and safety or resource protection.” We have no concerns in prioritizing human safety, but would like information on how sage-grouse conservation ranks when determining resource protection.
- *Conifer removal* – The drop-in language is less specific than what was discussed at the Federal Family meetings. UT, ID and NV/CA specifically committed to use of the VDDT models to establish LUP objective treatments by year. OR identified a commitment to remove conifers from specified distances from lek. This language is now absent. Please clarify if it is captured elsewhere in each plan, and if not, the rationale for these changes.
- *Technically and Economically Feasible* – The drop-in language states that BLM is solely responsible for determining what actions are technically and economically feasible. However, the responsible party within the BLM in making these decisions has not been identified. For consistency of application we suggest that the decision makers be identified in this language, and encourage that to be the State Director.
- *SFAs* – The drop-in language should clarify that all three conditions specified must be met within the SFAs.

Additional Recommendations

- *Conifer removal* – In addition to using various analysis tools to refine the location of specific areas we ~~suggest a priority for removal also be established if funding for project implementation is limited~~ recommend that you clarify the priority for removal in the plans.
- *-TTM Temp Closures* – We suggest an additional criterion for determining “considerable adverse effects” include the potential for fire ignition from motorized vehicle use in areas of high densities of non-native annual grasses.
- *Wild Horses and Burros* – We suggest this language also be included in the Rocky Mountain states. Wyoming has the second highest number of wild horses in the range of sage-grouse, thereby requiring the same management criteria.

Comment [JD1]: This seems like something that is of primary concern – unless there are similar measures already in the Wyoming plans?

Pat – you might know of something in the WY plans that I’m not aware of, so defer to you on this. But if there is nothing else in the WY plan to address this threat, suggest moving up.

- *RDFs* – The drop-in language states that RDFs are to help mitigate adverse impacts. Please clarify whether these features minimize or mitigate adverse impacts, and if RDFs will be a part of the official mitigation strategy for any particular project.
- *SFAs* – The statement that SFAs should be prioritized for “management actions” in addition to conservation actions could be misread. We suggest ~~deleting this statement and clarifying that conservation actions, which may include some management actions, be prioritized.~~ replace the language with stating that SFAs should be prioritized for conservation actions.
- *All allocations* – The drop-in language lacks clarity? regarding the application of more restrictive land use allocations in the existing RMPs. We presume this is for the conservation of sage-grouse and their habitats, but the language is unclear.

Comment [JD2]: Not sure what this bullet is asking for.

Comment [DP3]: I don't remember this from the FFM – do any of you? If not should I move this to the “important section”?