

From: [Shauna Ginger](#)
To: [Theresa Rabot](#)
Cc: [Pat Deibert](#); [Kathy Hollar](#); [Noreen Walsh](#); [Michael Thabault](#); [Jesse DElia](#); [Richard Hannan](#)
Subject: RE: GSG FEIS Mitigation Language
Date: Monday, January 12, 2015 10:11:27 AM

Will do.

FYI - I asked Matt why not "net" conservation gain. Here is his response:

..." My sense is that it is unnecessary in that a "gain" is a "gain"; "net" is just a reminder that we have to exceed the debit. I bet that folks thought it was cleaner language that would be more readily understood by the average member of the interested public."

--

Shauna Ginger
Ecosystem Services Biologist
USFWS Oregon Field Office
Portland, OR | 503-231-6949
Learn more about USFWS & Ecosystem Services [here](#)

From: Theresa Rabot [mailto:theresa_rabot@fws.gov]
Sent: Saturday, January 10, 2015 9:26 AM
To: Shauna Ginger
Cc: Pat Deibert; Kathy Hollar; Noreen Walsh; Michael Thabault; Jesse DElia; Richard Hannan
Subject: Re: GSG FEIS Mitigation Language

Shauna - please let Matt know we're good with the language

Terry Rabot
Theresa_Rabot@fws.gov
work: 503.872-2719
cell: 503.804.1762

On Jan 9, 2015, at 4:20 PM, Shauna Ginger <shauna_ginger@fws.gov> wrote:

I took a detailed look at the proposed changes. Overall I think they are good. If others think so as well I can respond to Matt as requested.

Note: I was first a bit concerned they say "provide a conservation gain" without the qualifier "net" (net conservation gain or net benefit) in regards to compensatory mitigation. However, the first paragraph of the Chapter 2 language clarifies they intend to provide a conservation gain through compensatory mitigation (after and independent of avoid, minimize, etc.). It's slightly different phrasing than we use, but I believe the same result.

--

Shauna Ginger
Ecosystem Services Biologist
USFWS Oregon Field Office

Portland, OR | 503-231-6949

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From: Deibert, Pat [mailto:pat_deibert@fws.gov]

Sent: Friday, January 09, 2015 9:49 AM

To: Theresa Rabot

Cc: Ginger, Shauna; Kathy Hollar; noreen walsh; Michael Thabault; Mr. Jesse DElia; Richard Hannan

Subject: Re: GSG FEIS Mitigation Language

I understand this is the language we accepted as per the grid exercise completed this week.

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On Fri, Jan 9, 2015 at 10:41 AM, Theresa Rabot <theresa_rabot@fws.gov> wrote:

I think I cc'd everyone who should at least be aware of the dialogue. I'll take a look soon.

Sent from my iPhone

On Jan 8, 2015, at 6:55 PM, "Ginger, Shauna" <shauna_ginger@fws.gov> wrote:

Fyi. Wil look at this tomorrow. Anyone we should be sharing this with?

-Shauna Ginger

----- Forwarded message -----

From: "Preston, Matthew" <mpreston@blm.gov>

Date: Jan 8, 2015 8:27 AM

Subject: GSG FEIS Mitigation Language

To: "Shauna Ginger" <shauna_ginger@fws.gov>

Cc: "Stephanie Carman" <scarman@blm.gov>

Hi Shauna,

Hope all is well. Happy new year!

Shortly before the holidays, I was asked to re-craft the GSG FEIS mitigation language to support the new, agreed-upon mitigation standard language (pasted in below). I believe that senior BLM, FWS, and DOI leadership approved this language. I took that agreed-upon language and inserted in all the right places, I hope, in the GSG FEIS mitigation language.

I have been asked to share the new draft FEIS language with you and your colleagues. I've left the track-changes on, so it would be easy to spot the changes (the original language is from the mitigation FEIS language we sent out to our planning teams in April 2014). Could you and your colleagues please take a look? Do you see any red

flags? Happy to schedule a call to chat, if that would be helpful.

New agreed-upon mitigation language: *"In undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and assure mitigation that provides a conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions."*

Thanks!

All the best, Matt

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Matt Preston, PhD
Chair, Regional Mitigation Team
Science Advisor, National Conservation Lands
Bureau of Land Management
202-912-7175; mpreston@blm.gov

<GS-G FEIS Mitigation Language 12_12_17.docx>

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Pat Deibert, PhD
Certified Wildlife Biologist®
U.S. Fish and Wildlife Service
5353 Yellowstone Road, Suite 308A
Cheyenne, WY 82009
307-772-2374, ext. 226

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