

From: [Grim, Mary](#)
To: [DElia, Jesse](#)
Cc: [Deibert, Pat](#)
Subject: Re: BLM buffer proposal
Date: Monday, January 12, 2015 10:30:13 AM

making sure i get this - minimums would be required in PHMA, and stressed in PGMA. If they can't be achieved in PGMA, we would require mitigation? If I got this right, I'm ok with it. I would not be ok with trading buffers for mitigation in PHMA.

Mary Grim

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On Mon, Jan 12, 2015 at 9:23 AM, DElia, Jesse <jesse_delia@fws.gov> wrote:

I haven't had a chance to analyze this in any detail given the short turn around. The general steps in Jim's e-mail make intuitive sense. I do have a concern that BLM is managing for the minimum interpreted range for lek buffers in priority habitat. Not sure if that is the appropriate use of those minimums or not - maybe a question for USGS. My read is that the maximum of the range encompasses areas where negative effects have been detected - if so we can expect that there will be a continued erosion of habitat quality in priority areas using minimum interpreted range for lek buffers.

Jesse

On Mon, Jan 12, 2015 at 7:44 AM, Deibert, Pat <pat_deibert@fws.gov> wrote:

see below - let me know if you have comments by noon mountain. Thanks!

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

From: Noreen Walsh <noreen_walsh@fws.gov>

Date: Mon, Jan 12, 2015 at 7:20 AM

Subject: Fwd: BLM buffer proposal

To: Michael Thabault <michael_thabault@fws.gov>, Matt Kales <matt_kales@fws.gov>, pat deibert X226 <Pat_Deibert@fws.gov>

Good morning. I did not receive this from BLM prior. See Jim's comments. Please provide a consolidated recommendation to me by 130 pm. Sorry for the short notice - apologies for the timing

Sent from my iPhone

Begin forwarded message:

From: "Lyons, James" <james_lyons@ios.doi.gov>

Date: January 12, 2015 at 6:01:06 AM PST

To: Sarah Greenberger <sarah_greenberger@ios.doi.gov>, Michael Bean <michael_bean@ios.doi.gov>, Steven Ellis <sellis@blm.gov>, Edwin

Roberson <eroberso@blm.gov>, Noreen Walsh <noreen_walsh@fws.gov>, Chris Iverson <Civerson@fs.fed.us>, Janice Schneider <janice_schneider@ios.doi.gov>

Subject: BLM buffer proposal

I reviewed and suggest revisions to the most recent buffer proposal from the BLM.

In brief, I stayed with the overall direction provided by the BLM:

1. kept this as a screening process -- rather than a "Required Design Feature;
2. required that projects in a PHMA meet the interpreted minimum for the relevant type of disturbance
3. provided for avoidance, minimization, or compensatory mitigation for projects in a GHMA that did not meet the minimum but could proceed if they produced a net conservation gain, but
4. required relocation of the project outside habitat or denial of the project of relocation could not occur.

However, I believe that the process as described goes well beyond determining if the proposed project meets the buffers identified in the USGS report by including screening for LUP conformance and density CAP conformance, which is irrelevant to the buffer issue.

So, what I layed out would walk through a process that only addresses the question of compliance with the USGS buffer report (reason ref to LUPs and density are struck). The steps then simply make clear:

1. What the buffer requirements are for proposed projects per the USGS report;
2. If in PHMA, interpreted minimum is the required minimum
3. If in GHMA, and not at the minimum, first, seek to avoid
4. If can't avoid, minimize or use compensatory mitigation measures
5. If mitigation cannot achieve net conservation gain, then relocate outside of habitat or deny.

In doing it this way, I attempted to focus screening solely on the buffer issue and make clear that minimum interpreted range is required in PHMA, is sought in GHMA although achieving a net conservation gain was also permissible. If neither can be achieved, move the project to outside SG habitat or deny.

Glad to discuss before we meet later in the day.

Please contact me with your thoughts.

Redline and revised, clean attached (note that the clean version has some added edits for clarification).

Jim

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Jim Lyons
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got leks?

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