

**From:** [DElia, Jesse](#)  
**To:** [Pat Deibert](#)  
**Subject:** Fwd: Draft SG Record Edits  
**Date:** Friday, January 30, 2015 12:42:04 PM  
**Attachments:** [PREDECISIONAL DELIBERATIVE - Idaho Disturbance Calc reconciliation 1-30-15 \(1\).docx](#)

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**From:** Mackey, Dennis <[dennis\\_mackey@fws.gov](mailto:dennis_mackey@fws.gov)>  
**Date:** Fri, Jan 30, 2015 at 11:35 AM  
**Subject:** Draft SG Record Edits  
**To:** Jesse DElia <[jesse\\_delia@fws.gov](mailto:jesse_delia@fws.gov)>  
**Cc:** Jason Pyron <[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)>, Kathleen Hendricks  
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Jesse:

Here are our edits to the record points you sent out to us . We can talk at 1:30 today if you want.

Thanks.

Dennis

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~~1-26-15~~ 1/30/15

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**Original e-mail**

Idaho BLM generated a novel equation for calculating disturbance for the purposes of monitoring for disturbance caps. Although IFWO did not express significant concerns when the calculation was presented by Idaho BLM, *since the disturbance cap in Idaho is not likely to be hit under either method*, our recent collective review of this equation in more detail (Pat, Jesse, and Jason) suggests that the genesis of this equation was based on the erroneous assumption that other planning efforts were not "incorporating fire" into their disturbance calculations. They note this in their rationale provided in draft proposal - "[a straight 3% disturbance cap] would not account for changes in effective habitat due to loss through fire or gain through restoration and rehabilitation." This is not true - all other planning areas are accounting for changes to the amount of available habitat (what Idaho BLM calls effective habitat) in the denominator of their disturbance calculations. In addition, the equation inserts two terms in their disturbance calculation that make the equation unnecessarily complex and difficult to interpret. First a term for the entire area of the BSU is included in the denominator, yet anthropogenic disturbance is only being measured in the effective habitat. Second, the inclusion of a "constant" is added as a correction factor. The result of adding these terms is that in some circumstances the amount of disturbance (in acres) actually allowed under a 3% cap would vary significantly depending on the equation applied - with Idaho's equation allowing more disturbance before hitting the cap in some scenarios.

It is unclear why Idaho BLM developed its own disturbance calculation apart from the rest of the Great Basin planning areas as we have been asking for consistency to the extent possible. That said, IFWO is confident that the conservation outcomes for sage-grouse will be the same regardless of the calculation methodology because the anthropogenic disturbance cap is not likely to be hit under either methodology *in Idaho*. Fire and invasives remain the greatest threat to sage-grouse habitat in that State. However, there is general agreement that applying Idaho's methodology more broadly *could* be problematic, because in areas where an anthropogenic disturbance cap is likely to be hit, Idaho BLM's methodology *could* allow for a higher percentage of anthropogenic disturbance before a cap is hit in some scenarios.

**Reconciliation with the call on Friday**

After discussion with FWS and BLM personnel on 1/23/15 conference call, it became clear that people were using different versions of BLM guidance, and also that guidance was still likely changing. This resulted in miscommunication. Several points of agreement were reached on that call:

1. The fact that the disturbance cap is not likely to be hit is irrelevant to whether or not Idaho's calculation methodology is adequate. Idaho BLM agrees completely.
2. Brent clarified that they ~~did not assume other planning efforts were not incorporating fire. They~~ developed their own equation because there was no national guidance and they were trying to come up with something that would work for their planning area. Their calculation does include fire in the denominator.
3. Whether and how fire will be used in the calculation will be clarified in the final BLM guidance.
- ~~3-4. Brent provided clarification as to why they included additional terms in their equation. **Other planning areas are not accounting for disturbance outside of priority habitat within the BSU (at the broad and intermediate scales), while Idaho's calculation does account for those disturbances. Our statement above assumed all disturbances in Idaho's calculation were in sage-grouse priority habitat. We recommend that this be clarified in Idaho BLM's writeup.**~~

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4.5. ~~The BLM~~ We recommend clarified that the ~~that the net effect of using Idaho's methodology will be conducted at the broad and mid and project scales.~~ scales versus the methodologies in the other Great Basin states should be clarified in Idaho's writeup.

5. ~~The FWS~~ We recommend that Idaho clarify ~~in their writeup~~ how they intend to calculate disturbance at the local/project scale, ~~or how their calculations offer similar levels of protection.~~