

**From:** [Pyron, Jason](#)  
**To:** [Jay Martini](#)  
**Subject:** Fwd: draft comments  
**Date:** Thursday, January 22, 2015 12:50:30 PM  
**Attachments:** [FIAT Comments 012215 meeting.docx](#)

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Katie already forgot you...

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

**From:** **Powell, Katie** <[katie\\_powell@fws.gov](mailto:katie_powell@fws.gov)>  
**Date:** Thu, Jan 22, 2015 at 11:29 AM  
**Subject:** draft comments  
**To:** Sarah Kulpa <[sarah\\_kulpa@fws.gov](mailto:sarah_kulpa@fws.gov)>, Jason Pyron <[jason\\_pyron@fws.gov](mailto:jason_pyron@fws.gov)>, Angela Sitz <[angela\\_sitz@fws.gov](mailto:angela_sitz@fws.gov)>

Attached.

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*Comments from Katie*

- *Water Improvements (only GIS layer is in CO). SGB has more detail in plan, but not layer.*
- *Fuel breaks in 1C should only occur if there is adequate justification.*
- *No fuel breaks in Utah.*
- *Priorization did not occur outside of SGB (everything in NGB was 1<sup>st</sup> priority). No use of Table 4 from R&R Report.*

Make TOC clickable, page numbers in addition to section numbers

Too much redundancy redundancy redundancy in document pdf file paper.

e.g. for example section up front on common things

specific things on PPA listed in their section

'consistent proactive and reactive guidance for all PPAs' e.g. put in section 4.1.3

See WGB fire ops section bullet points

Inconsistent application of R&R across fiat therefore effectiveness is compromised.

No timetable – some do. Need to know summary list of projects that are NEPA completed and shovel ready.

No commitment for completion.

### Fuels Management

**Make sure we continue fuel breaks across state and PAC boundaries**

**Limit fuel breaks outside focal habitats (75%BBD laid on R&R)**

UT BBD not that high?

Winter habitat?

Is this too site specific?

Smaller than PAC

Rationale – monoculture of annual grass with lots of fuel?

**For fuel breaks extending outside focal habitat ensure there is rationale for why those are included.**

Make up of fuel breaks

Crested wheatgrass – rips up

Forage kochia

**Sarah to write up**

Intact native systems – mowing preferred? This may not be the place for this level of discussion – present as comments and things for BLM to consider?

Comprehensive set of treatments – not just one or other

Need follow up to fuel breaks

Identify appropriate maintenance schedule

**Inconsistent application** – across FIAT there are different densities of fuel break

Need rationale

Especially in 3A

Grazing

Timing, facilities in place to deal with it

Targeted grazing on annuals

Juniper treatment

## Habitat Restoration and Recovery

Focusing on proactive vs reactive treatments

Identify passive treatments in addition to active - to increase community resilience and resistance

BLM Teams need to do this

Native plants – need for localized seed

Principle 6 – identify which groups mentioned this and which did not

Focus on proactive approaches

Treatments should be shared across all teams, expanding their toolbox, identify good treatments and encourage those treatments to be shared to other teams

Comments should encourage consistency across documents in things we support

Level for this kind of comment? Should be NEPA level comment?

Provide guidance – under these conditions we encourage .....

Guidance for next step to avert problems down the road

Be specific where we can – take that opportunity now

Vs. more general approach – comment on what they have given us, project planning stuff comes later.

**Eg. Comment** - Across all planning areas consider changing timing intensity and duration of grazing to increase perennial grass density across rangeland sites to increase overall site resistance and resilience.

Use healthy lands funds to pay for rest?

Use infrastructure?

**e.g comment** Conifer treatments alone don't constitute restoration and need to be coupled with other vegetation objectives, e.g. after treating conifer in phase 2 treat for cheatgrass and follow with seeding.

Invasives – some teams had bigger area, some had more detailed, some had just where past fire and occurred. Need more consistent approach to addressing invasives.

Need GIS data for treatment areas

Use suite of techniques to treat invasives, need to monitor understory, lack of proactive strategies to improve understory, focus restorative treatments on improving understory.

Fuels management vs habitat restoration – stuff in different sections in different teams – funding thing? Put under primary focus, have language 'restores habitat too'.

## Fire Ops

Suppression was not prioritized – priorities not consistently prioritized according to table 4

Specifically NGB and SSB – see SGB

Did they identify opportunities to improve or enhance suppression capabilities

e.g 30 mile response window analysis

see CO and SGB

water availability analysis

prepositioning

consistent elevation? Use R&R?

can't have broad brush elevation

slope/aspect?  
Soil poly is too detailed  
Elevation is an easy distinction to make for decision

Bullet points consistent across all teams? (WGB Fire ops)  
BLM already have direction to do this/IM?  
Focus on what actions need to be initiated – and priority.  
Educational tool for firefighters  
Frontload this as priority area

Hard to follow techniques used to create fire ops poly  
Docs too long  
Mapping attributes not consistent  
Potential inconsistent application of R&R across FIAT assessment areas

Polys exist beyond focal habitat areas

**Inconsistent across jurisdictional boundaries – state, district**

#### ESR

Overarching language in SGB should be consistently applied in other teams  
Inconsistent application of GIS across teams  
Are treatments prioritized according to table 4

#### Conifer

Addressing conifers in different programs – see fuels  
Distance to lek to give priority – 1 or 2 miles  
Is there a consistent application of phase 1 vs phase 2 - miller 2005?  
Prioritizing – 3c with PJ  
1B second order unless summer habitat  
Consistent application of chambers table 4 need biological rationale