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To: [Noreen Walsh](#)
Cc: [Matt Kales](#); [Michael Thabault](#); [Jesse DElia](#); [Mary Grim](#)
Subject: GRSG BLM buffer issues
Date: Monday, January 12, 2015 2:46:49 PM

Noreen -

This approach is a step forward from the previous version. Our remaining concerns are:

BLM is focusing management on the minimum interpreted range for lek buffers in PHMA. We would prefer focusing on higher end of the interpreted range as a starting point. We do appreciate their commitment to use the lower end of the interpreted range for GHMA as a starting point for management in those areas. Criteria for departures from the USGS interpreted buffers, even to using the lowest interpreted range value, need to be clearly identified.

BLM actions, as well as third-party authorizations need to be included in this discussion of buffers. That point was deleted by Mr. Lyons, but was contained in the original text.

We recommend BLM defer to the state for a definition of a lek. If they wish to define lek themselves for consistency across the range they should use the most conservative state definition across the 11 states.

The final product should be carefully cross-walked with the NPT guidance to ensure consistency.

Pat

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got leks?