

**From:** [Deibert, Pat](#)  
**Cc:** [Lief Wiechman](#)  
**Subject:** Re: Question re: disturbance caps and fire  
**Date:** Monday, May 05, 2014 12:36:46 PM  
**Attachments:** [National GSG Planning Strategy Disturbance\\_FWS edits 050514.docx](#)

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Matt -

Here is my attempt at explaining this. First, as per the weekly phone call with BLM this a.m. their disturbance document provided for the NPT is incorrect. I have made edits where I know the document is in error and in accordance with the conversation this a.m. I have also added a comment documenting a concern I have that may have been resolved during the call that I missed as an FYI. BLM is also revising the document, and I cannot guarantee the words will be the same, but they are addressing the same concerns.

Noreen's calculations are correct. However, since fire is the big issue in the GB the BLM has opted to not include it. Given our current abilities to restore large unburned areas in the GB, if a large part of a PAC is lost due to fire it simply is not longer habitat. The solution in these cases is a strong adaptive management strategy that would instead re-evaluate the remaining value of those areas to support birds. If the affected areas cannot maintain the birds and a soft trigger is tripped, then the losses of habitat are addressed then. The RM side has taken a far more conservative approach, but fire is not the primary concern there.

The concerns expressed by R1, specifically for ID, may be valid. But they have not offered how deviating from our overall recommendations will still lead to conservation. We have asked them to provide that clarity.

p

On Mon, May 5, 2014 at 8:18 AM, Matt Kales <[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)> wrote:

Heading to DIA in a few so am sending this as background for you all to respond to R1, per Terry's message through Noreen. Please follow up with 1 and circle back with Noreen and me so we are all talking off the same page with Dan and externals on this. Thanks in advance.

Begin forwarded message:

**From:** Noreen Walsh <[noreen\\_walsh@fws.gov](mailto:noreen_walsh@fws.gov)>  
**Date:** May 1, 2014 at 1:11:56 PM MDT  
**To:** Matt Kales <[matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)>  
**Subject:** RE: Question re: disturbance caps and fire

Thank you very much.

Translation below: "Fire is included in disturbance caps, but isn't counted directly as a disturbance. Instead, it is counted in terms of how much acreage it removes, which has the effect [per Gordon's example] of increasing the amount of disturbance."

It does increase the calculated percentage disturbance over the baseline amount; however, the increase in percentage disturbance is LESS THAN if fire was counted as disturbance in the numerator. SEE ATTACHED. It is a difference between 1.053% disturbance using Gordon's approach vs. 6% disturbance counting fire as disturbance with his example. Unless my math is wrong. Which is always possible.

We just need to be able to explain to the Director when he asks me again, why this is an acceptable approach.

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**From:** Matt Kales [[mailto:matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)]  
**Sent:** Wednesday, April 30, 2014 4:25 PM  
**To:** Noreen Walsh  
**Subject:** FW: Question re: disturbance caps and fire

FYI and please pardon any cross-postings. I discussed this with our folks and per my below, we are satisfied with BLM's response. To ensure we could explain this to the general public, I translated it as follows (Pat concurred with my translation):

"Fire is included in disturbance caps, but isn't counted directly as a disturbance. Instead, it is counted in terms of how much acreage it removes, which has the effect [per Gordon's example] of increasing the amount of disturbance."

Thanks.

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**From:** Matt Kales [[mailto:matt\\_kales@fws.gov](mailto:matt_kales@fws.gov)]

**Sent:** Wednesday, April 30, 2014 4:22 PM  
**To:** Gordon Toevs  
**Cc:** Lief Wiechman; Nicole Alt; Pat Deibert; Kathryn Stangl  
**Subject:** RE: Question re: disturbance caps and fire

Gordon,

Thanks for your below response, and please pardon my slow response: we were in off-site meetings earlier this week with the SGTF and I'm just now catching up. As I mentioned to Kathy yesterday, your explanation does help us understand the language in question and we are good with same. Much obliged.

Matt

**From:** Toevs, Gordon [<mailto:gtoevs@blm.gov>]  
**Sent:** Friday, April 25, 2014 3:41 PM  
**To:** Matt Kales; Nicole Alt; Pat Deibert; Kathryn Stangl  
**Subject:** Question re: disturbance caps and fire

Matt,

Kathy forwarded me your question regarding disturbance:

Specifically, we are hoping you can explain the footnote in the latest disturbance cap table that indicates "*Fire(s) would be calculated against habitat availability.*" We are not 100% certain what that means and how it relates to the actual 3% disturbance cap. Some elaboration, and perhaps some examples, would be helpful.

Let me give this a go and please let me know if I hit the mark.

The disturbance and monitoring team (Lief and Lara are on this team) has taken the following approach:

The 18 FWS listing decision threats are all disturbances. However, some remove habitat and some degrade habitat. Fire is in the former category where it removes habitat and it will not be added back in until restored. So, if you say there are 1,000,000 acres of priority habitat in the biologically meaningful unit and there are 10,000 acres of existing disturbance. The calculation is:  $10,000 / 1,000,000 * 100$  or 1% disturbance.

Now say a fire burns 50,000 acres, so now you only have 950,000 acres of priority habitat. The calculation is:

$10,000 / 950,000 * 100$  or 1.05% disturbance.

Does this help?

Gordon

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Gordon Toeys

Desk--202-912-7202

Cell--202-567-1589 cell

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got leks?

As addressed in the Greater Sage-grouse Conservation Objectives Team (COT) Final Report, habitat protection is crucial for the conservation and protection of this species. The conservation principles from the COT Report recommend that disturbance should occur outside of General and Priority habitat. In addition, the GRSG National Technical Team Report recommended that a 3% disturbance objective be considered for Priority Habitat, regardless of ownership. The National GRSG planning strategy has focused on minimizing disturbance in General Habitat and ensuring little to no disturbance in Priority Habitat. In an effort to provide consistency in managing and calculating disturbance across the various proposed plans associated with the National GRSG Planning Strategy (as well as assisting the reader in understating the application of proposed disturbance caps), the following disturbance criteria (outlined in the table below) should be considered for all of the proposed plans:

|  | BLM National GRSG Planning Strategy – Management Actions   |   |   |
|--|--|---|---|
|  | Great Basin (NV, CA, ID <sup>1</sup> , UT, OR)   | Rocky Mountain (CO, MT, SD, ND)           | Wyoming                                   |
| <i>What is the disturbance cap<sup>2</sup>?</i>                                | 3 %, <u>measured at 30 m scale</u>   | Same as Great Basin                       | 5 %, <u>measured at 1m scale</u>          |
| <i>No net unmitigated loss?</i>  | Yes - Priority and General Habitat within a PAC  | No  | No  |
| <i>Where is the cap applied?</i>   | Priority Habitat within a PAC  | Same as Great Basin                       | Core Habitat Areas                        |
| <i>Does the disturbance cap calculation include fire<sup>3</sup>?</i>          | <del>Yes</del> <u>No</u>   | <del>Same as Great Basin</del> <u>Yes</u> | <del>Same as Great Basin</del> <u>Yes</u> |
| <i>Does the disturbance cap apply to all ownership types?</i>                  | Yes –Priority Habitat within a PAC   | Same as Great Basin                       | Yes – Core Habitat                        |
| <i>Suggested language to incorporate as an objective in the administrative</i> | Manage Priority Habitat within priority areas of conservation (PACs) so that discrete anthropogenic disturbances | Same as Great Basin                       | N/A                                       |

Comment [DP1]: To support VER

April 24, 2014

| BLM National GRSG Planning Strategy – Management Actions |  |                                 |         |
|--|--|---------------------------------|---------|
|  | Great Basin (NV, CA, ID <sup>1</sup> , UT, OR)   | Rocky Mountain (CO, MT, SD, ND) | Wyoming |
| <i>proposed plan.</i>                                    | cover less than 3% of the total available GRSG habitat for all ownership types. Monitoring data at the broad and mid-scales will inform when a disturbance cap is reached. |                                 |         |

- 1 For Idaho/SW Montana EIS, Medial Habitat would follow the same management regime as Priority Habitat
- 2 National Technical Team Report calls for the management of priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership.
- 3 Fire(s) would be calculated against habitat availability.

Comment [DP2]: This is ID primary concern

Calculations for baseline disturbance will be determined using the Broad and Mid-Scale Data. For consistency purposes this information will be run at the National Operations Center (NOC) and will be used to inform the public of our existing on-the-ground conditions as it relates to disturbance as identified in the Monitoring Framework Plan.

| BLM National GRSG Planning Strategy – Baseline Disturbance |  |   |   |
|--|--|---|---|
|  | Great Basin (NV, CA, ID <sup>1</sup> , UT, OR)   | Rocky Mountain (CO, MT, SD, ND)                       | Wyoming   |
| <i>Does baseline include existing disturbances?</i>        | Yes  | Same as Great Basin                                   | <u>Yes</u>  |
| <i>Does the baseline apply to all ownership types?</i>     | Yes – At a minimum Priority Habitat within a PAC<br>General Habitat – Federal lands unless specified in LUPs               | Same as Great Basin                                   | Yes – Core Habitat                                    |
| <i>Data used to inform the rangewide disturbance</i>       | <ul style="list-style-type: none"> <li>Habitat degradation (percent of human activity in a population/PAC area)</li> </ul> | Same as Great Basin <u>plus disturbance from fire</u> | Same as Great Basin <u>plus disturbance from fire</u> |

April 24, 2014

| BLM National GRSG Planning Strategy – Baseline Disturbance   |   |                                 |   |
|--|---|---------------------------------|---|
|  | Great Basin (NV, CA, ID <sup>1</sup> , UT, OR)  | Rocky Mountain (CO, MT, SD, ND) | Wyoming   |
| <i>calculation and cap?</i>  | <ul style="list-style-type: none"> <li>Habitat availability (percent of sagebrush in a population/PAC area) - Measure 1 in the Monitoring Framework</li> <li>Habitat degradation intensity (density of energy facilities and mining locations) - Measure 3 in the Monitoring Framework</li> </ul> |                                 |   |
| <i>Data used to inform baseline (fine-scale estimates when a broad scale estimate approaches the cap)?</i> | Location-specific (fine scale) habitat degradation data   | Same as Great Basin             | Density and Disturbance Calculation Tool (DDCT) |

1 For Idaho/SW Montana EIS, Medial Habitat would follow the same management regime as Priority Habitat