

**From:** [Deibert, Pat](#)  
**To:** [Linner, Susan](#)  
**Cc:** [Thabault, Michael](#); [Matt Kales](#); [Patty Gelatt](#); [Terry Ireland](#); [Creed Clayton](#)  
**Subject:** Re: revised BLM comments  
**Date:** Wednesday, November 27, 2013 1:06:46 PM

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I'm fine with these changes. I've not read the specific comment letter since Monday, but assume similar changes have been made there. If you would like me to review that as well, please let me know (didn't see it attached).

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On Wed, Nov 27, 2013 at 9:11 AM, Linner, Susan <[susan\\_linner@fws.gov](mailto:susan_linner@fws.gov)> wrote:  
Suggested changes to #2 based on Mike's comment below.

2. We believe that a conservation measure under Alternative D to retain at least 70% of ecological sites in sagebrush in each Colorado management zone, and adding a 30% disturbance cap to include all causes (anthropogenic, wildfire, plowed field agriculture, vegetation treatments, mappable stands of cheatgrass and pinyon-juniper, but not irrigated meadows) is a misuse of the NTT standard. The 30% was not meant as a disturbance criterion, rather as an indication that on a landscape scale GRSG are found in areas containing a large percentage of sagebrush, but that within those areas there are smaller portions of the landscape that are not composed of sagebrush habitat. **While we wholeheartedly support BLM's commitment to manage the landscape to maintain at least 70% in sagebrush habitat**, we recommend that the final plan not contain a dual-level disturbance cap (3% and 30% with different categories of disturbance). Rather, we recommend that the final plan contain one disturbance cap for all types of mappable disturbance to GRSG habitat (anthropogenic ground disturbance, fire, cropland not providing GRSG habitat, etc.). We recommend that this cap be set at 3% (as outlined above).

On Wed, Nov 27, 2013 at 9:05 AM, Thabault, Michael <[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)> wrote:

Thanks Susan. Did you want to include in number 2 support for the notion of maintaining large intact sage brush landscapes that contain at least 70% sage brush?

Michael Thabault  
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On Wed, Nov 27, 2013 at 8:52 AM, Linner, Susan <[susan\\_linner@fws.gov](mailto:susan_linner@fws.gov)> wrote:

Here is proposed revised language for BLM issues # 1 and 2. Creed did clarify with BLM that their intention is that the 30% cap would be applied to all designated habitat (the entire management zone) and would include all disturbance types. Please feel free to make edits in this e-mail and return it to me. Thanks.

1. The Service recommends that a 3% anthropogenic disturbance cap be used within PPH, regardless of ecological site description. The 3% anthropogenic disturbance cap was recommended in the NTT Report and is part of Alternative B, which follows NTT Report recommendations. Findings from recent literature, as described in our attached comments, suggest that a 5% anthropogenic cap would lead to GRSG population declines. The 3% cap should include, but is not limited to, anthropogenic ground disturbance, fire, and cropland not providing GRSG habitat. If BLM/FS choose to incorporate a 5% anthropogenic disturbance cap in PPH in the FEIS we request justification for the 5% cap. The justification must include biological rationale such as the species' resiliency to impacts by comparing existing level of disturbance to long-term population trends. Consideration of conservation measures could also be included in the justification.

2. We believe that a conservation measure under Alternative D to retain at least 70% of ecological sites in sagebrush in each Colorado management zone, and adding a 30% disturbance cap to include all causes (anthropogenic, wildfire, plowed field agriculture, vegetation treatments, mappable stands of cheatgrass and pinyon-juniper, but not irrigated meadows) is a misuse of the NTT standard. The 30% was not meant as a disturbance criterion, rather as an indication that on a landscape scale GRSG are found in areas containing a large percentage of sagebrush, but that within those areas there are smaller portions of the landscape that are not composed of sagebrush habitat. We recommend that the final plan not contain a dual-level disturbance cap (3% and 30% with different categories of disturbance). Rather, we recommend that the final plan contain one disturbance cap for all types of mappable disturbance to GRSG habitat (anthropogenic ground disturbance, fire, cropland not providing GRSG habitat, etc.). We recommend that this cap be set at 3% (as outlined above).

Susan

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