

**From:** [Bush, Jodi](#)  
**To:** [Berglund, Jeff](#)  
**Subject:** Re: GRSG draft Species Report E-mail 3 of 3  
**Date:** Friday, June 05, 2015 9:47:30 AM

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So looks like we have an official assignment to respond to the status report with a memo by June 12. Just a heads up -lets talk early monday morning. JB

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On Mon, Jun 1, 2015 at 4:39 PM, Berglund, Jeff <[jeff.berglund@fws.gov](mailto:jeff.berglund@fws.gov)> wrote:  
Uff-da, those are some serious page quantities. Didn't read every word, obviously, but I think I got the gist. I didn't see any major omissions or errors relative to MT, but did notice a couple of minor items of which you should be aware:

1) Impacts Analysis, p. 129 - not quite accurate about the MT EO and wind energy - the EO currently reads that wind energy "should be avoided" in core, while this FWS doc states that it will be excluded in core (that's where we're trying to get them to go...). Also, the EO only pertains to state lands, or other lands where state authorization is required - and there is no state-level wind energy siting law or process. Probably a minor clean-up issue.

2) Impacts Analysis, p. 136, 1st paragraph - the Mud Springs project (120 turbines in core habitat) isn't specifically included in the discussion, but should be, since the proponents now have technically started construction.

3) Impacts Analysis, p. 159, State Plans - don't see any discussion here as to why WY is OK with their plan's tall structure buffers (we mention why we are not ok with the proposed buffer in the second paragraph...)

4) Chapter 27: Regulatory Mechanisms, p. 288 - doesn't mention the MT BLM's approach of adding the additional 2% cap for ag conversion + fire (provided below) - maybe it's too much detail, but technically the statement "For all states, except Wyoming..." isn't quite accurate. Just in case it comes up, here's what the MT plans actually say:

*If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a project analysis area in PHMAs, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the 1872 Mining Law, valid existing rights, etc.) would be permitted by BLM within PHMA in a project analysis area until the disturbance has been reduced to less than the cap. If the BLM determines that the State of Montana has adopted a GRSG Habitat Conservation Program that contains comparable components to those found in the State of Wyoming's Core Area Strategy including an all lands approach for calculating anthropogenic disturbances, a clear methodology for measuring the density of operations, and a*

*fully operational Density Disturbance Calculation Tool, the 3% disturbance cap would be converted to a 5% cap for all sources of habitat alteration within a project analysis area.*

Also, it looks like they correctly considered those restoration areas in the modeling exercises, and did not appear to include them as PHMA in their maps and analyses, which is good. Hope you're having fun down there. The party continues up here...

J

On Mon, Jun 1, 2015 at 10:52 AM, Bush, Jodi <[jodi\\_bush@fws.gov](mailto:jodi_bush@fws.gov)> wrote:

Let me know if you see anything wrong that I need to know. JB

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

From: **Thabault, Michael** <[michael\\_thabault@fws.gov](mailto:michael_thabault@fws.gov)>

Date: Thu, May 28, 2015 at 4:47 PM

Subject: GRSG draft Species Report E-mail 3 of 3

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Regulatory Mechanisms  
Cumulative and Synergistic effects  
and  
Appendices

Draft final agendas and other material coming tomorrow.

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