

Internal Working Document

APPENDIX X BLM REGIONAL **COMPENSATORY** MITIGATION STRATEGY

[If a mitigation or BMP/RDF appendix already exists in the EIS, simply place this language at the end of the document or where appropriate]

Comment [UF&WS1]: Since this is all about compensatory mitigation, it should be clearly stated.

Regional **compensatory** mitigation is a landscape-scale approach to mitigating impacts to resources and values managed by the BLM from authorizations approved by the BLM in order to provide for sustained yield of resources on the Public Lands. A regional approach to **compensatory** mitigation occurs across the landscape and focuses on attaining the highest conservation benefit, regardless of land ownership. A regional **compensatory** mitigation approach shifts the BLM's focus from a permit-by-permit perspective to a proactive regional-scale mitigation planning perspective.

The regional approach to **offsite** **compensatory** mitigation is in addition to the BLM's priority of mitigating impacts to an acceptable level onsite, to the extent practical, through avoidance (**not taking a certain action or parts of an action**), minimization (**limiting the degree or magnitude of the action and its implementation**), rectification (**repairing, rehabilitating, or restoring the affected environment**), or reduction of impacts over time (**preservation and maintenance operations during the life of the action**).

Comment [UF&WS2]: Is the intent really to limit this regional approach to offsite compensatory mitigation, and purposefully exclude onsite compensatory mitigation from the approach? It seems we would want all compensatory mitigation to run through the team, if for no other reason to ensure that they have the chance to head off potentially poor onsite mitigation projects in lieu of more beneficial offsite projects (maybe even for the same cost...). Also, including both on and offsite projects seems more consistent with #2 (identifying type of mitigation) below.

For those impacts that cannot be avoided or minimized **onsite**, the BLM must ensure implementation of effective measures to offset (or compensate for) such impacts and to ensure the viability of sage grouse habitat and populations over time. Regional **compensatory** mitigation is an important tool for ensuring the BLM continues to meet its greater sage-grouse resource objectives while continuing to honor our multiple-use mission. Regional **compensatory** mitigation strategies will be a key component of many large renewable and nonrenewable energy development projects as well as many smaller projects with cumulative effects on the greater sage-grouse and its habitat.

Comment [UF&WS3]: No such thing as offsite avoidance or minimization, so this word isn't necessary.

This regional **compensatory** mitigation strategy will comply with BLM's *Regional Mitigation Planning and Implementation* Manual Section (MS) 1794, which provides policies, procedures, and instructions for:

1. adopting a regional approach to planning and implementing mitigation, including pre-identifying potential mitigation sites, projects, and measures; and
2. Identifying the type of mitigation (onsite or outside of the area of impact) that is appropriate when compensating for impacts to resources or values caused by a land use authorization. This may be most appropriate in the near vicinity of the area of impact in many instances.

In addition to complying with MS-1794, the BLM will establish a Mitigation Implementation Team for each of the six WAFWA Management Zones in the West, following the completion of each of the 15 sub-regional EISs that are associated with the National Greater Sage-Grouse Planning Strategy. The planning area presented in this sub-regional EIS lies within the [redacted] WAFWA Management Zones.

These implementation teams will be responsible for:

1. Establishing a structure for determining appropriate mitigation, **including impact (debit) and benefit (credit) calculation methods, mitigation ratios, mitigation "currency" (i.e., numbers of birds, acres, etc.), and performance standards** for a specific WAFWA Management Zone,
2. Resolving mitigation oriented discrepancies that arise within the WAFWA Management Zone and PACs,
3. Guiding the application and holding of mitigation funds,
4. Prioritizing potential mitigation sites, projects, and measures,

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5. Recommending the most appropriate mitigation for a land use authorization,
6. Prioritizing the most beneficial habitat areas for mitigation (e.g PACs, priority habitat areas),
7. Reviewing monitoring reports and analyzing and reporting on project effectiveness, corrective measures / adaptive management (where required), and cumulative effects of mitigation actions at the PAC and the WAFWA zone, and
8. Coordinating between RMP planning areas, WAFWA management zones and PACs for mitigation consistency, where appropriate.

Comment [UF&WS4]: I'm still concerned with the inconsistency between RMPs – maybe adding this helps get at that concern somewhat...

These WAFWA Management Zone Implementation Teams will function as inter-disciplinary teams (IDTs) composed of:

- BLM staff, specializing in greater sage-grouse biology,
- The cooperating agencies (listed in section [REDACTED] of the DEIS) that were involved in this planning process, including (at a minimum) representation from each of the states in the WAFWA zone and the USFWS,
- A third party facilitator, (e.g. the National Fish and Wildlife Foundation)and
- A mitigation plan project manager elected by the Mitigation Working Group.