

# How the National Technical Team Report Changes the way the BLM Operates

## Fluid Minerals Program

The BLM would preclude fluid mineral development within designated priority sage-grouse habitat. Where the BLM cannot preclude development due to valid existing rights, the BLM would attach moderate to major restrictions to the development and require the use of certain Best Management Practices (BMP) in the form of Conditions of Approval (COA). The following are some of the key points for priority sage-grouse habitat areas:

### Unleased Federal Mineral Estate:

- The BLM would halt leasing within priority sage-grouse habitat areas.
- The BLM would halt or heavily restrict geophysical exploration within priority sage-grouse habitat areas.

### Leased Federal Mineral Estate:

The BLM would apply the following conservation measures through Resource Management Plan (RMP) implementation decisions. This process will evaluate, among other things, whether the conservation measure is “reasonable” (43 CFR 3101.1-2) with the valid existing rights.

- The BLM would place a 3.1 mile buffer [~30 square miles] around the perimeter of all sage-grouse leks within priority sage-grouse habitat areas, where no disturbance would be authorized [No Surface Occupancy]. *(Formerly this buffer was set to 0.25-0.6 miles, depending on the field office)*
- The BLM would restrict well pad spacing to a maximum of 2.5% disturbance per 640 acres or to no more than 16 acres per square mile within priority sage-grouse habitat areas, unless an equal amount of offsite mitigation is provided.
- The BLM would no longer utilize Categorical Exclusions (CX) including those under the Energy Policy Act of 2005, Section 390 for approval of Applications for Permit to Drill (APD) or Geophysical Exploration in priority sage-grouse habitat. Environmental Assessments (EA) or Environmental Impact Statements (EIS) would be required for these activities in priority sage-grouse habitat due to the potential resource conflicts. The BLM would still have the option of a DNA in the future if referencing the EA or EIS mentioned above.
- The BLM would apply seasonal restrictions to prohibit activity during breeding and brood-rearing seasons.
- The BLM would require unitization to better control the development and restrict development to one operator within priority sage-grouse habitat areas.
- The BLM would require full reclamation bonds for any disturbance within priority sage-grouse habitat areas.
- The BLM would prohibit disturbance within sage-grouse winter concentration areas.
- The BLM would require offsite mitigation.
- The BLM would require operators to submit Master Development Plans for their units as opposed to single APDs.
- The BLM would attach a set of applicable mandatory BMPs to all APDs in priority sage-grouse habitat areas as COAs including such practices as phased development, rolling reclamation, corridoring infrastructure, directional/horizontal drilling, closed-loop systems, advanced reclamation techniques, etc.

**From:** [Fielder, Dwight](#)  
**To:** [Morales, Raul](#)  
**Subject:** RE: Planning IM and NTT Report  
**Date:** Tuesday, December 20, 2011 10:40:26 AM

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Let's talk. Are you in Amy's office or are you calling from home?

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**From:** Morales, Raul  
**Sent:** Tuesday, December 20, 2011 1:40 PM  
**To:** Fielder, Dwight  
**Subject:** Re: Planning IM and NTT Report

Can you right the forward that will address Jim's cocerns?

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**From:** Fielder, Dwight  
**Sent:** Tuesday, December 20, 2011 09:48 AM  
**To:** Morales, Raul  
**Subject:** FW: Planning IM and NTT Report

fyi

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**From:** Roberson, Edwin  
**Sent:** Tuesday, December 20, 2011 11:00 AM  
**To:** Nedd, Michael D  
**Cc:** Perry, Jim; Jackson, Larry P; Kniola, Benjamin E; Martin, Benjamin F; Gewecke, William; Brady, Ray A; Lucero, Lucas J; Spisak, Timothy; Fielder, Dwight; Rubado, Jessica A; Ratcliffe, Robert; Rountree, Carl D; Murphy, Timothy M; Todd, Marci L; Stout, Joseph R; Russell, Gregory  
**Subject:** Re: Planning IM and NTT Report

Michael,

We have been discussing the NTT report and the draft planning instruction memorandum on the national policy team for months. There were minerals and lands staff participating on the national technical team to ensure there was a full discussion of alternative conservation strategies related to all authorized uses. The report and cover letter from Raul Morales make it clear the primary focus of the measures in the final report are for conservation of the sage grouse. It is a discouraging to me that we have not been able to communicate that clearly to all of the folks who have been participating in the process during the last several months.

As the planning instruction memo clearly states these measures are to be considered in planning: "The conservation measures developed by the NTT and contained in Attachment 1 must be considered and analyzed through the land use planning process by all BLM State and Field Offices that contain occupied Greater Sage-grouse habitat. Specifically, these conservation measures must be considered and incorporated, as appropriate, into at least one alternative in the land use planning process."

There is no requirement to select the alternative(s) including the measures in the NTT report. The impacts you and Ray discuss would be addressed in the impact analysis for the alternative including the conservation measures. There will of course be a full range of alternatives in the RMP/EISs developed under the strategy. There will be alternatives with different levels of conservation and development. The public will be able to be aware of the tradeoffs. As you know all this is part of the public decisionmaking process. If we've done a good job our RODs will provide for continued energy development and transmission while precluding the need for listing of the sage grouse. The planning teams are demanding this guidance ASAP so they can conduct plan evaluations and proceed with scoping. So it is urgent that we get it out. We can discuss on the NPT call. Ed

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**From:** Nedd, Michael D  
**Sent:** Tuesday, December 20, 2011 07:05 AM  
**To:** Roberson, Edwin  
**Cc:** Perry, Jim; Jackson, Larry P; Kniola, Benjamin E; Martin, Benjamin F; Gewecke, William; Brady, Ray A; Lucero, Lucas J; Spisak, Timothy  
**Subject:** FW: Planning IM and NTT Report

Ed,

Thank you for the opportunity to review and comment on the proposed NTT Report. Here are our comments and due to time constraint, I'm sending you two NTT report comments document. The "WO320" document with comments is in addition to "Perry" document.

Overall, the NTT Report conservation measures (planning prescriptions) are complete game-changers for any actions within the Priority Habitats where there are valid existing rights and showstoppers for those actions where there are no valid existing rights. We strongly believe the changes we are proposing will ensure the BLM can continue to play a role in helping to meet the nation's energy (both conventional and renewable) demands. It is my understanding that our staff (primarily Jim Perry) are having discussions with your staff on some of the changes and there are some agreements.

The Conservation Measures are focused on identifying all lands within Priority Habitat Areas as "exclusion areas" for rights-of-way and all lands within General Habitat Areas as "avoidance areas" for rights-of-way. The biggest problem with this strategy is if the BLM is going to move designated corridors and right-of-way applications out of the Priority Habitat Areas (exclusion lands), then we must have the ability to designate corridors and site rights-of-way within the General Habitat Areas. Therefore, identifying the General Habitat Areas as avoidance areas (tens of millions of acres) is totally unworkable and may be viewed by some as one more BLM attempt to hinder energy development. We need to allow rights-of-way on these lands with mitigation opportunities

that provide for off-site mitigation to improve habitat in the Priority Habitat Areas.

The NTT Report includes sections on Habitat Restoration and Monitoring of Habitats, however and as an example, the prescriptions for rights-of-way are instead focused on identifying exclusion areas and avoidance areas through planning decisions. The Conservation Measures for rights-of-way should focus instead on opportunities for habitat restoration and monitoring, adaptive management and off-site mitigation. There are outstanding opportunities for significantly improving sage grouse habitats in Priority Habitat Areas by allowing rights-of-way in General Habitat Areas and allowing for off-site mitigation and restoration of lands disturbed to better sage grouse habitats. Many rights-of-way can be restored to better sage brush vegetation than previously existed.

In several places (i.e. page 11) we noticed that there are references to only a few literature citations that attempt to portray the impacts to a program (lands, minerals, etc.) and as far as we know, there really are no studies that have been completed that show this direct correlation. We are not aware of any Before/After/Control/Treatment (BACT) studies that have been completed specifically on linear rights-of-way or even more specifically on wind energy or renewable energy projects. Our proposal will be for the BLM to support efforts for some adaptive management, off-site mitigation and BACT monitoring in General Habitat Areas instead of identifying these lands as avoidance lands.

We look forward to further discussing this policy.

Take care and have a wonderful day! : )

MDN – 202-208-4201

A thought to consider *"Do all the good you can, in all the ways you can, for all the people you can, while you can!"*

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**From:** Nedd, Michael D

**Sent:** Monday, December 19, 2011 7:18 AM

**To:** Leverette, Mitchell; Berns Kim M; Brady, Ray A; Shoop, Robyn; Martin, Benjamin F; Lucero, Lucas J; Wells, Steven; Perry, Jim; Kniola, Benjamin E

**Subject:** Fw: Planning IM and NTT Report

Please review (or have your staff review) and provide your comments to Jim (or Ben K), unless they are both out on leave then I'll ask Steve/Robyn or Mitch/Frank, to id someone to collect the comments and get it to me.

Take care and have a wonderful day! :-)))

MDN - 202-208-4201

A thought to consider *"Do all the good you can, in all the ways you can, for all the people you can, while you can!"*

Jim Perry  
Senior Natural Resource Specialist  
Bureau of Land Management  
Washington, D.C.  
202-912-7145 desk  
202-251-5017 cell

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**From:** Fielder, Dwight  
**Sent:** Wednesday, December 21, 2011 10:13 AM 2  
**To:** Perry, Jim  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

What did you predict?

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**From:** Perry, Jim  
**Sent:** Wednesday, December 21, 2011 11:54 AM )  
**To:** Fielder, Dwight  
**Subject:** Re: Follow up to Today's NPT call on the NTT report

Dwight

I thought we had agreed last night to modify the parts that were contrary to law or regulation...  
except for NSO?

We didn't just step backwards did we? Making progress?

(What I predicted last night about NSO is coming true.)

Jim

Jim Perry  
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Bureau of Land Management  
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**From:** Fielder, Dwight

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**From:** Fielder, Dwight  
**To:** Morales, Raul  
**Subject:** FW: Follow up to Today's NPT call on the NTT report  
**Date:** Wednesday, December 21, 2011 9:57:18 AM

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Fyi. I think we might need Amy's help on this one.

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**From:** Fielder, Dwight  
**Sent:** Wednesday, December 21, 2011 12:56 PM 4  
**To:** Perry, Jim  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

Who is doing the research? I was assuming we probably had a duty to preclude drainage and that this requirement came from the mineral leasing act? I do not think this can be included in the NTT report, because it is a consensus document that included outside scientists. I think we can contextualize the document with the language I offered earlier and Raul can call out the drainage issue specifically in the transmittal memo. I have said all along that we will not have policy folks messing around with the NTT report and I'm afraid we are pushing the limit with the issues we agreed to yesterday.

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**From:** Perry, Jim  
**Sent:** Wednesday, December 21, 2011 12:52 PM 3  
**To:** Fielder, Dwight  
**Subject:** Re: Follow up to Today's NPT call on the NTT report

That drainage is a very important issue to people above me, and its prevention is supported by law or regulation, (they are researching it now), and that forces above me will ensure it is adequately addressed. That I would step back from the issue, but others will not. You know.... that stuff.

Here's me stepping back:

If a technical document can prescribe putting utilities in corridors, it can certainly prescribe a form of leasing with virtually zero impact. You can even put "zero" impact in the lease terms.

Almost done with the shoe molding.

**From:** [Fielder, Dwight](#)  
**To:** [Morales, Raul](#)  
**Subject:** FW: Follow up to Today's NPT call on the NTT report  
**Date:** Wednesday, December 21, 2011 11:01:35 AM

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I don't know how to respond to this and am thinking that I shouldn't.

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**From:** [pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov) [mailto:[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)]  
**Sent:** Wednesday, December 21, 2011 1:56 PM  
**To:** Fielder, Dwight; Morales, Raul; 'dave.naugle@cfc.umt.edu'; Perry, Jim; Goodman, Jonathan D; Stout, Joseph R  
**Subject:** Re: Follow up to Today's NPT call on the NTT report

The NTT is providing the science. That does not change with the laws that BLM works under.

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**From:** "Fielder, Dwight" [[dfielder@blm.gov](mailto:dfielder@blm.gov)]  
**Sent:** 12/21/2011 10:15 AM MST  
**To:** Pat Deibert; Raul Morales; "dave.naugle@cfc.umt.edu" <[dave.naugle@cfc.umt.edu](mailto:dave.naugle@cfc.umt.edu)>; Jim Perry; Jonathan Goodman; Joe Stout  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

But, does the NTT really want to recommend something that is blatantly illegal? It seems to me that the caveat provided makes it clear that the NTT document IS a technical document that has not undergone a policy or legal review.

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**From:** [pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov) [mailto:[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)]  
**Sent:** Wednesday, December 21, 2011 11:59 AM  
**To:** Fielder, Dwight; Morales, Raul; 'dave.naugle@cfc.umt.edu'; Perry, Jim; Goodman, Jonathan D; Stout, Joseph R  
**Subject:** Re: Follow up to Today's NPT call on the NTT report

I would only consider adding this to a cover memo. The report is a science document period.

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**From:** "Fielder, Dwight" [dfielder@blm.gov]  
**Sent:** 12/21/2011 08:55 AM MST  
**To:** Raul Morales; "dave.naugle@cfc.umt.edu" <dave.naugle@cfc.umt.edu>; Jim Perry; Jonathan Goodman; Joe Stout; Pat Deibert  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

To address concerns raised by Jim that some of the NTT recommendations may not be possible under existing law, we are proposing to add the following verbiage (or variation thereof) to the NTT Report introduction, the memo from Raul to the NPT and, possibly, the IM:

"The recommendations in this report have not undergone a full legal review to ensure that they are consistent with the variety of statutes and regulations with which the BLM must comply. Where inconsistencies arise, it is the hope of the NTT that the recommendation(s) may be considered to the fullest extent consistent with the law."

Do you think the NTT would be comfortable with this addition?

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**From:** Morales, Raul  
**Sent:** Tuesday, December 20, 2011 3:31 PM  
**To:** 'dave.naugle@cfc.umt.edu'; Perry, Jim; Fielder, Dwight; Goodman, Jonathan D; Stout, Joseph R; Deibert, Pat  
**Subject:** Re: Follow up to Today's NPT call on the NTT report

Ok, we are on for 2:00 Pacific time this afternoon. Thanks everyone.

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**From:** Dave Naugle [mailto:dave.naugle@cfc.umt.edu]  
**Sent:** Tuesday, December 20, 2011 12:59 PM  
**To:** Morales, Raul; Perry, Jim; Fielder, Dwight; Goodman, Jonathan D; Stout, Joseph R; Deibert, Pat  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

Raul,

I'm in and can do it today; was on a conference when you rang. Dave.

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**From:** Morales, Raul [mailto:rmorales@blm.gov]  
**Sent:** Tuesday, December 20, 2011 12:47 PM  
**To:** Perry, Jim; Fielder, Dwight; Goodman, Jonathan D; Stout, Joseph R; Deibert, Pat; Dave Naugle  
**Subject:** Follow up to Today's NPT call on the NTT report

I am trying to pull a call together for 2:00 Pacific time to discuss Jim's comments. I am waiting to hear back from Dr. Naugle and Dr. Tom Remington to see if they can join us. Tom is actually

**From:** [Goodman, Jonathan D](#)  
**To:** [Fielder, Dwight](#); [Morales, Raul](#); [Stout, Joseph R](#)  
**Subject:** RE: Follow up to Today's NPT call on the NTT report  
**Date:** Wednesday, December 21, 2011 8:04:41 AM  
**Attachments:** [Greater Sage-Grouse National Planning Strategy Draft 12 21 11\(clean\).docx](#)

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Clean final copy of the IM attached, pending SOL input.

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Dave Goodman  
Planning & Environmental Analyst  
BLM Division of Decision Support, Planning, and NEPA (WO-210)  
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**From:** Fielder, Dwight  
**Sent:** Wednesday, December 21, 2011 10:59 AM  
**To:** Goodman, Jonathan D  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

Fine by me.

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**From:** Goodman, Jonathan D  
**Sent:** Wednesday, December 21, 2011 10:58 AM  
**To:** Fielder, Dwight  
**Subject:** RE: Follow up to Today's NPT call on the NTT report

How about this language to include in the IM?

The conservation measures in Attachment 1 have not undergone a full legal review to ensure that they are consistent with the variety of statutes and regulations with which the BLM must comply. Where inconsistencies arise, the BLM should consider the conservation measure(s) to the fullest extent consistent with the law.

Overall, I'd get rid of recommendations and put in conservation measures to be consistent with our language.

--

Dave Goodman  
Planning & Environmental Analyst

> 775-861-6464 (p)  
>  
> From: Morales, Raul  
> Sent: Wednesday, December 21, 2011 3:20 PM  
> To: Roberson, Edwin; Nedd, Michael D; Walsh, Noreen  
> Cc: Fielder, Dwight; Stout, Joseph R; Stout, Joseph R; Goodman, Jonathan D; Rubado, Jessica A  
> Subject: NTT Report and Transmittal Letter  
>  
> The NTT Report and Transmittal letter have been updated to reflect the comments discussed on yesterday's NPT call. Most comments in The NTT report centered in the fluids minerals section and Appendix D and a few in the Travel and Transportation section.  
>  
> Merry Christmas to all and a Happy New Year.  
>  
> Raul Morales  
> Deputy State Director Resources, Lands and Planning  
> Bureau of Land Management  
> 775-861-6464 (p)

**From:** [Perry, Jim](#)  
**To:** [Morales, Raul](#); [Fielder, Dwight](#)  
**Cc:** [Kniola, Benjamin E](#); [Bargsten, Travis D](#); [Wells, Steven](#); [Perry, Jim](#)  
**Subject:** RE: NTT Report and Transmittal Letter  
**Date:** Thursday, December 22, 2011 11:37:36 AM

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Raul,

Here are two main points from Dave.... and both statements make sense and are fine with me. **But my question is not answered and my concerns remain. Is the NTT report in error? Please see my recommendation at the bottom.**

Dave said.....

"You have it right...the 50-70% is a minimum acreage of sagebrush habitat necessary over broad scales to maintain a population. "

"Thus the limit of 1 pad per square mile and a 3% cap on additional footprint."

**The key words from Dave are "additional footprint"**

**But here is what the NTT Report actually says in the quotes below.** (Rather than 50% - 70% in sagebrush habitat (the minimum needed on a broad scale to maintain a population based on Science), the priority habitat must already, today, have over 97% in sagebrush habitat or else no development is permitted.)  $100\% - 3\% = 97\%$

- Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat regardless of ownership.....
  - "In priority habitats where the **3% disturbance threshold is already exceeded from any source, no further anthropogenic disturbances will be permitted by BLM** until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights)."
  - In this instance, an additional objective will be designated for the priority area to prioritize and reclaim/restore anthropogenic disturbances so that 3% or less of the total priority habitat area is disturbed within 10 years.

**I do not understand the logic in this....at least not the way it is worded in the NTT report.**

**RECOMMENDATION:**

**The report should say something like, ..."the amount of sagebrush habitat in the priority habitat areas, as of the date of this plan amendment, is a baseline, and additional anthropogenic surface disturbances must not increase the anthropogenic surface footprint by more than 3% "**

The NTT bullet points above need to be removed from the report as it conflicts with science.

Jim

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**From:** Morales, Raul  
**Sent:** Thursday, December 22, 2011 1:03 PM  
**To:** Perry, Jim; Fielder, Dwight  
**Subject:** Fw: NTT Report and Transmittal Letter

Jim, your answer to your question this morning.

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**From:** Dave Naugle [<mailto:dave.naugle@cfc.umt.edu>]  
**Sent:** Thursday, December 22, 2011 10:52 AM  
**To:** Morales, Raul  
**Subject:** RE: NTT Report and Transmittal Letter

Raul,

You have it right...the 50-70% is a minimum acreage of sagebrush habitat necessary over broad scales to maintain a population. I'm not a big fan of setting "minimums" because that is then the number everybody tries to achieve. In reality, many cores surpass this 50-70% minimum because they were delineated around the best remaining habitats.

The non-sagebrush sites within cores may be naturally fragmented or the result of past anthropogenic impacts. Regardless, we cannot further litter the cores with additional anthropogenic impacts without expecting impacts to populations.

We got off track on the NSO and drainage issue because some view non-sagebrush habitat inside cores as a throw away developable area. But additional impacts anywhere inside cores increases cumulative impacts beyond the site of the new well pad. Thus the limit of 1 pad per square mile and a 3% cap on additional footprint.

We've progressed in our thinking past individual lek buffers to now delineate whole cores at appropriately large scales that encompass all seasonal habitats necessary to support a population. We will still see impacts from 1 pad per square mile and a 3% cap on new anthropogenic disturbances.

I hope these end up being acceptable losses that still respect valid existing rights. I suspect the NTT Team would be very leery of endorsing any additional impacts inside cores.

The NPT can determine if existing laws or other issues preclude NTT recommendations; but that is a policy issue not a technical one.

Happy holidays Raul,

Dave

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**From:** [Perry, Jim](#)  
**To:** [Morales, Raul](#); [Felder, Dwight](#)  
**Cc:** [Kniola, Benjamin E](#); [Bargsten, Travis D](#); [Perry, Jim](#); [Wells, Steven](#)  
**Subject:** RE: NTT Report and Transmittal Letter  
**Date:** Thursday, December 22, 2011 6:28:14 AM  
**Attachments:** [2011\\_1221\\_Final\\_NTT\\_Report\\_edits\\_made\\_by\\_NTT.docx](#)

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Raul and Dwight,

Thanks for making those edits and for mentioning NSO in the Transmittal memo to the NPT!

I'm confused why the "Locatable Minerals" BMPs did not get changed to "Solid Minerals" in the Appendix?!?

Last night's edits opens a new, very serious question.... It may be too late to address this in the report, but it is one we will need to address in our outreach to the field....

It appears to me the BLM is being unnecessarily set up for immediate failure across the priority habitats. Nearly all contain roads, pipelines, power lines, homes, farms, well pads, etc.... Science says 30 – 50% in non-sagebrush cover is okay (see quote below), but the NTT Report says 3% in anthropogenic features is the NTT recommended maximum (see quote below).

Am I missing something, is it worded poorly, or is this a misapplication of professional judgment and science?

The report now makes this scientifically-based assertion:

Within priority habitat, a minimum range of **50-70% of the acreage in sagebrush cover** is required for long-term sage-grouse persistence (Aldridge et al. 2008, Doherty et al. 2010, Wisdom et al. 2011).

That leaves an allowance of **30 - 50% in non-sage-brush cover**. So how was the 3% maximum cap on surface anthropogenic features derived based on "professional judgment"? (see footnote) **3% is a long way from 30 – 50%**

Manage priority sage-grouse habitats so that discrete anthropogenic disturbances cover less than 3% of the total sage-grouse habitat **regardless of ownership**. Anthropogenic features include but are not limited to paved highways, graded gravel roads, transmission lines, substations, wind turbines, oil and gas wells, geothermal wells and associated facilities, pipelines, landfills, homes, and mines. <sup>iii</sup>

<sup>iii</sup> Professional judgment as derived from Holloran 2005, Walker et al. 2007, Doherty et al. 2008, Doherty et al. 2011, Naugle et al. 2011a,b.

- In priority habitats where the 3% disturbance threshold is already exceeded from any source, no further anthropogenic disturbances will be permitted by BLM until enough habitat has been restored to maintain the area under this threshold (subject to valid existing rights).

**From:** [pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)  
**To:** [Morales, Raul](#)  
**Subject:** Re: NTT report  
**Date:** Monday, November 07, 2011 2:49:34 PM  
**Attachments:** [2011\\_1006 NTT ConservationMeasures PlanningStrategy \(2\).pd.doc](#)

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Here you go. All is good except the 12 inch fire stuff. We are stuck as I can't support using that from an ESA standpoint. No amount of bananas will help unless you (or the range folks) can convince me there are absolutely no other treatments available, no matter how hard they are.

stubborn in WY.  
Pat

*(See attached file: 2011\_1006 NTT ConservationMeasures PlanningStrategy (2).pd.doc)*

Pat Deibert , PhD.  
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U.S. Fish and Wildlife Service  
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307-772-2374, ext. 226  
~ "Morales, Raul" <[rmorales@blm.gov](mailto:rmorales@blm.gov)>

"Morales, Raul"  
<[rmorales@blm.gov](mailto:rmorales@blm.gov)>

To "Deibert, Pat" <[pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)>  
cc  
Subject NTT report

11/07/2011 03:04 PM

Pat, please take a quick look at what I have highlighted in yellow and let me know if you can live with these additions. I would like to send the report to WO today.

Thx.

Raul Morales  
Deputy State Director Resources, Lands and Planning  
Bureau of Land Management  
775-861-6464 (p)  
[attachment "2011\_1006 NTT ConservationMeasures PlanningStrategy (2).doc" deleted by Pat Deibert/R6/FWS/DOI]

**From:** [Sell, Robin A](#)  
**To:** [Morales, Raul](#); [Mermejo, Lauren L](#);   
**Subject:** quick review of NTT document  
**Date:** Monday, September 19, 2011 11:51:47 AM  
**Attachments:** [2011\\_0916\\_NTT\\_ConservationMeasures\\_PlanningStrategy\\_NTT\\_ReviewDraft\\_RAS.doc](#)

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Raul et al-

I know you guys have done a lot of good work on the document, and I did a reaaaaallly quick review- (attached).

A couple of quick points from memory- Not sure we can say we did a review of existing literature and I don't think Tony's group embarked on that, they were trying to fill in holes for citations etc. The 'new way' to discuss or calculate surface disturbance has merit, but leaves me with lots of questions as well – not sure you can make changes, 'cause I don't know who worked on it or based on what model.

Did the 1/640 acres density recommendation get dropped? Or did I just go over it too fast?

A few other points – poor sentences or clarity for example, may seem minor at this point- but may aid in thorough review if you can fix.

Thanks, Robin

**From:** [Wood, David](#)  
**To:** [Morales, Raul](#)  
**Subject:** RE: NTT Report  
**Date:** Monday, November 14, 2011 11:31:26 AM

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Hi Raul,

Thanks for the update and glad to see this report heading out to the NPT and others. I am trying to schedule some other sage-grouse planning meetings over the next few weeks so can you give me an idea of if I will be asked to be on the smaller team for the next steps of this and what dates I would need to reserve for that? Thanks!

David Wood  
Conservation Biologist  
MT/Dakotas BLM State Office  
(406) 896-5246

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**From:** Morales, Raul  
**Sent:** Saturday, November 12, 2011 10:32 AM  
**To:** Mermejo, Lauren L; Sell, Robin A; Rinke, Earl T; Wood, David; Rose, Jeffrey A; Pellant, Michael L; Quamen, Frank R; Bargsten, Travis D; Havlina, Douglas W; Figarella, Mary; Beecham, Charlie F; Knick, Steven T.; Deibert, Pat; 'dave.naugle@cfc.umt.edu'; 'sespinosa@ndow.org'; 'jasonrobinson@utah.gov'; 'tony.apa@state.co.us'; 'don.kemner@idfg.idaho.gov'; Perrin, Robert S; 'christian.a.hagen@state.or.us'; '(b) (6)'; 'happlylabs@millec.com'  
**Cc:** 'Adair Muth'; Smurthwaite, Donald S; Fielder, Dwight; Tague, Melvin J; Rubado, Jessica A  
**Subject:** RE: NTT Report

Woops, hit the wrong button!

The rest of the story.

During our several month wait I and others were able to address additional comments I had received from many of you to improve the report. Also, while we were waiting NDOW Director Ken Mayer commissioned an outside review of just the conservation measures by 6 scientist. A small team of NTT members addressed many of these scientist comments and rolled them into our latest draft NTT report (See attachment from Director Ken Mayer and the scientist comments).

The SOL wanted to keep the report as draft and that is why you will see the draft watermark on the plan. Their concern is that they are in negotiations with litigants on a separate lawsuit involving 16 BLM Land Use Plans and they wanted to make sure that our Policy recommendations section did not contradict or mess up these negotiations. As of last Wednesday when the National Policy Team (NPT) received the draft NTT report for the first time the solicitor on the call was feeling positive that our NTT report was not going to impede their negotiations, however, the SOL was waiting from staff comments on the report.

Also, at last Wednesday's NPT call I got another assignment on the NTT report that will involve a small number of NTT members. In the scientist review of our report you will notice one scientist's concern that our report could be challenged (blowback) by outside groups without a stronger

connection between our conservation measures to the available science. I have been tasked to bring the science folks from our NTT team together with an outside scientist to begin strengthening our connections. This will need to be accomplished prior to the publishing of the National Sage Grouse Planning Notice of Intent which is scheduled to be published mid-December. I will be contacting this small group of NTT individuals shortly.

The NPT will be releasing the NTT report to all of the BLM State Director's soon, if it hasn't happened already. The WO will be issuing an Instruction memorandum early this coming week that will direct the rest of the Bureau on how the NTT report will be used in the upcoming planning effort. At this point the NTT report will officially become public knowledge. The NPT has asked that I share with you the latest NTT report and to still keep as a close hold to the NTT team until the WO issues their IM.

I have also been working with Public Affairs to draft some talking points for the NTT report which I hope to finalize very soon.

While a report of this nature will not make everyone completely happy I would say that overall, the report seems to have been favorably received both internally and externally. The next step of strengthening the science in our report will no doubt make this report more robust and will lead to an excellent starting point for BLM's planning effort. Again, I am very proud of all our efforts that week we spent in Denver and afterwards putting the report together.

Please call or send me a note if you have any questions.

Thanks and have a great week.

Raul Morales  
Deputy State Director Resources, Lands and Planning  
Bureau of Land Management  
775-861-6464 (p)

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**From:** Morales, Raúl  
**Sent:** Saturday, November 12, 2011 8:59 AM  
**To:** Morales, Raul; Mermejo, Lauren L; Sell, Robin A; Rinkes, Earl T; Wood, David; Rose, Jeffrey A; Pellant, Michael L; Quamen, Frank R; Bargsten, Travis D; Havlina, Douglas W; Figarelle, Mary; Beecham, Charlie F; Knick, Steven T.; Deibert, Pat; [dave.naugle@cfc.umt.edu](mailto:dave.naugle@cfc.umt.edu); [sespinosa@ndow.org](mailto:sespinosa@ndow.org); [jasonrobinson@utah.gov](mailto:jasonrobinson@utah.gov); [tony.apa@state.co.us](mailto:tony.apa@state.co.us); [don.kemner@idfg.idaho.gov](mailto:don.kemner@idfg.idaho.gov); Perrin, Robert S; [christian.a.hagen@state.or.us](mailto:christian.a.hagen@state.or.us); (b) (6) | [happylabs@millelect.com](mailto:happylabs@millelect.com)  
**Cc:** Adair Muth  
**Subject:** NTT Report

Hello fellow NTT members!

I want to give you the latest on our NTT report. Washington BLM finally received the Governor's letters that the solicitor's said we needed in order for me to forward our report to DC. The SOL wanted to make sure that there were no FACA issues related to the state agency involvement in our NTT report.

**From:** [Apa, Tony](#)  
**To:** [Christian Hagen](#); [Knick, Steven T](#); [David Naugle](#); [Deibert, Pat](#)  
**Cc:** [Kemner, Don](#); [Shawn P. Espinosa](#); [JasonRobinson@utah.gov](#); [Morales, Raul](#)  
**Subject:** Citations for NTT product  
**Date:** Monday, September 12, 2011 3:22:16 PM  
**Attachments:** [NTT ConservationMeasures PlanningStrategy 0902 2011 draftScience Citations.docx](#)

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Hey Everyone,

I've been putting out other brush fires with regards to my day job and haven't had much time with this. I've tried to identify those biological recommendations that may need a scientific citation. I've taken my hand at highlighting as well and those things I flagged are in grey. I'm working on an introductory part on certainty of conclusions and inference space with regards to science without relating it to any study in particular and run it by everyone. If we don't have the science I'm assuming it will be our best professional judgement.

So, if you could get each of you to take a shot and identify a research citation that supports the biological recommendation along with the full citation I would greatly appreciate the help. Many of you were authors/editors of the SAB and/or an editor of a recent book, so you will have a much better handle on the recent literature than I. I will put together the literature cited and then can incorporate those citations into a more "final document" along with the literature cited.

I would like to get this to Raul before COB Thursday. Thanks in advance.

## **Tony Apa**

Sage-Grouse Research Biologist  
Colorado Parks & Wildlife  
Northwest Region Service Center  
711 Independent Avenue  
Grand Junction, CO 81505  
970.255.6196 (office)  
970.640.1671 (cell)  
[tony.apa@state.co.us](mailto:tony.apa@state.co.us)

Do you have some thoughts for me to pass along to Ray?

E. Dwight Fielder, Chief  
Division of Fish and Wildlife Conservation  
Bureau of Land Management  
(202) 912-7230 (Office)  
(202) 285-6845 (Cell)

**From:** Stout, Joseph R  
**Sent:** Tuesday, December 20, 2011 8:35 AM  
**To:** Roberson, Edwin; Fielder, Dwight; Rubado, Jessica A; Todd, Marci L  
**Cc:** Goodman, Jonathan D  
**Subject:** FW: Planning IM and NTT Report

FYI

Joe Stout  
Planning and NEPA Branch Chief  
Bureau of Land Management  
Washington DC  
202-912-7275 (w)  
202-658-8191 (bb)

**From:** Brady, Ray A  
**Sent:** Tuesday, December 20, 2011 8:31 AM  
**To:** Perry, Jim; Nedd, Michael D; Leverette, Mitchell; Berns Kim M; Shoop, Robyn; Martin, Benjamin F; Lucero, Lucas J; Wells, Steven; Kniola, Benjamin E  
**Cc:** Goodman, Jonathan D; Stout, Joseph R  
**Subject:** Re: Planning IM and NTT Report

I have reviewed the Planning IM and Conservation Measures for the rights-of-way activities on page 11-12 of the NTT Report. These planning prescriptions will be significant game changers and unworkable in my mind for the linear ROW program, including renewable energy rights-of-way (especially wind energy program).

The Conservation Measures are focused on identifying all lands within Priority Habitat Areas as "exclusion areas" for rights-of-way and all lands within General Habitat Areas as "avoidance areas" for rights-of-way. The biggest problem with this strategy is that if BLM is going to have any ability to move designated corridors and right-of-way applications out of Priority Habitat Areas (exclusion lands), we are going to have to have the ability to designate corridors and site rights-of-way within the General Habitat Areas. Identifying General Habitat Areas as avoidance areas (tens of millions of acres) is totally unworkable. We need to allow rights-of-way on these lands with mitigation opportunities that provide for off-site mitigation to improve habitat in the Priority Habitat Areas.

The NTT Report includes sections on Habitat Restoration and Monitoring of Habitats, however the prescriptions for rights-of-way are instead focused on identifying exclusion areas and avoidance areas thru Planning decisions. The Conservation Measures for rights-of-way should focus instead on opportunities for habitat restoration and monitoring, adaptive management and off-site mitigation. There are outstanding opportunities for significantly improving sage grouse habitats in Priority Habitat Areas by allowing rights-of-way in General Habitat Areas and allowing for off-site mitigation and restoration of lands disturbed to better sage grouse habitats. Many rights-of-way can be restored to better sage brush vegetation than previously existed.

Page 11 makes references to only a few literature citations that attempt to portray the impacts of rights-of-way on sage grouse. There really are no studies that have been completed that show this direct correlation and I am not aware of any Before/After/Control/Treatment (BACT) studies that have been completed specifically on linear rights-of-way or even more specifically on wind energy or renewable energy projects. Let's support efforts for some adaptive management, off-site mitigation and BACT monitoring in General Habitat Areas instead of identifying these lands as avoidance lands.

**From:** Perry, Jim

**Sent:** Tuesday, December 20, 2011 05:07 AM

**To:** Nedd, Michael D; Leverette, Mitchell; Berns Kim M; Brady, Ray A; Shoop, Robyn; Martin, Benjamin F; Lucero, Lucas J; Wells, Steven; Kniola, Benjamin E; Perry, Jim

**Cc:** Goodman, Jonathan D; Stout, Joseph R

**Subject:** RE: Planning IM and NTT Report

Mike,

Ben and I completed our review of the Planning IM and NTT Report. We did not receive any additional 300 program input, so we also looked at the ROW and Solids programs. Those programs might want to look through and verify our edits today, but otherwise, this quick review is good to go to Ed Roberson.

There is one really critical change that needs to be made in the Planning IM. I've discussed it with Dave Goodman – a planner and the primary author, and he agrees. Dave now needs to sell it to his team at their meeting today, so I've cc'd Dave.

Overall, the NTT Report conservation measures are complete game-changers for any actions within the Priority Habitats where there are valid existing rights and showstoppers for those actions where there are no valid existing rights.

Jim

**From:** [Lueders, Amy L](#)  
**To:** [Morales, Raul](#)  
**Subject:** RE: FW: Planning IM and NTT Report  
**Date:** Tuesday, December 20, 2011 8:11:28 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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You were right—I should have gotten the crying out of my system @ FEI. Ray's note makes me want to cry.

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**From:** Morales, Raul  
**Sent:** Tuesday, December 20, 2011 8:02 AM  
**To:** Lueders, Amy L  
**Subject:** Fw: FW: Planning IM and NTT Report

It continues this morning.

---

**From:** [pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov) [[mailto:pat\\_deibert@fws.gov](mailto:pat_deibert@fws.gov)]  
**Sent:** Tuesday, December 20, 2011 08:49 AM  
**To:** Fielder, Dwight  
**Cc:** Morales, Raul  
**Subject:** Re: FW: Planning IM and NTT Report

Dwight -

Avoidance areas are not exclusion areas. It was not the intent to shut-down ROW in general sage-grouse habitats, but rather be extremely judicious in their placement. Pushing them outside of PPH without provisions for general habitats would likely have resulted in lots of ROWs in the general areas, some of which may have been duplicative or unnecessary. That may have diminished the value of the adjacent PPHs, and potentially preclude opportunities for restoration and maintenance of connectivity in general habitats. I don't think there are any expectations that there will be no ROWs in general habitats, and the NTT acknowledges valid existing rights in both PPH and general habitats, and provides provisions. I've copied Raul on this response to make sure I am not mis-interpreting the intent of the NTT.

As for no knowledge on ROWs - we know a lot about roads and the effects on sage-grouse vital rates - particularly breeding activities. We don't know about most renewables, but given the similarities in infrastructure with non-renewables and their known negative impacts on sage-grouse we can use professional judgement to be conservative in planning developments. Research is on-going, and those data - when available - should be used for adaptive management. I would love to restore unneeded ROWs to "better sagebrush vegetation" but am unaware of the ability to do so. Funding and seed sources also seem to be reoccurring concerns with revegetation to sagebrush and the associated native understory.

This is a change in business as usual - no doubt - and it will result in some difficult choices. I don't believe either the IM or the NTT stop valid existing rights, nor was that their intent. I do think they will make us think more creatively about how to honor those rights and conserve sage-grouse. This is also true for new activities. In the end it may come to a choice between conserving grouse or not on these local projects.

**From:** [erinkes@blm.gov](mailto:erinkes@blm.gov)  
**To:** [pmabie@enviroissues.com](mailto:pmabie@enviroissues.com); Morales, Raul  
**Subject:** Introduction for NTT Report  
**Date:** Wednesday, September 14, 2011 3:42:03 PM

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Penny and Raul.

I have had a discussion about the intro that I proposed with Steve Ellis and our Chief SOL in Boise. I have some suggested wording changes concerning a recommendation that I made last week for the introduction. This involves the second paragraph following the bullet points as to the charge of the NTT team in the introduction. The following is my revised wording for the paragraph:

These policy recommendations and conservation measures were identified and discussed among team members. The recommendations and measures provide the tools to BLM that provides for the greatest potential for success to conserve sage-grouse. The team understands that management will implement these recommendations and conservation measures to the greatest extent practicable and may prioritize actions/amendments over other actions/amendments to achieve the best use of resources and protection of sage-grouse within a region.

Tom

\*\*\*\*\*

Tom Rinkes, Wildlife Biologist  
BLM Idaho State Office  
Division of Resources and Science (931)  
208.373.4045  
208.559.8477(c)

**From:** [Tague, Melvin J](#)  
**To:** [Morales, Raul](#)  
**Cc:** [Rubado, Jessica A](#)  
**Subject:** FW: sage grouse NTT report  
**Date:** Thursday, November 10, 2011 7:09:03 AM

---

Raul,

I think you will have to answer this one.

Joe

---

**From:** Roberson, Edwin  
**Sent:** Wednesday, November 09, 2011 11:49 AM  
**To:** Brown, George  
**Cc:** Morales, Raul; Tague, Melvin J; Rubado, Jessica A; Perry, Jim; Spisak, Timothy  
**Subject:** Re: sage grouse NTT report

I am not a biologist, George. I have copied folks who can provide you an answer. Thank you. Ed

---

**From:** Brown, George  
**Sent:** Wednesday, November 09, 2011 12:34 PM  
**To:** Roberson, Edwin  
**Subject:** sage grouse NTT report

Edwin,

Questions about an item on page 9 of the NTT report.

(1) Each one-mile<sup>2</sup> analysis section will be managed so that total anthropogenic disturbance does not exceed 2.5% <sup>(p1)</sup> %. However, total anthropogenic disturbance is likely to exceed this threshold within an analysis unit with some developments. For example, a sand and gravel mine can result in intensive development of 40 acres, effectively rendering the area unsuitable to sage-grouse. The actual 40-acre disturbance may not push total anthropogenic disturbance to more than 2.5% for the entire priority area, but obviously has a significant local impact. In these situations, 40 acres of off-site mitigation will be necessary to offset this loss of habitat. The priority is to implement off-site mitigation within the priority sage-grouse habitat, followed by general sage-grouse habitat.

-What is the scientific basis/rationale for selecting 2.5% (instead of some other percentage)?

It appears to refer to 2.5% of every section, regardless of the actual size of the priority habitat area, so the limitation would be greater.

For instance, if the priority habitat area is 20 square miles (12,800 acres), 2.5% of that would be 320 acres (20 times 640 acres times 2.5%). But if it pertains to every section, then the limit is 16 acres of disturbance per section (2.5% times 640 acres), or 0.125% of the priority habitat area.

-Given the example and assuming that is what is intended as the limitation, what is the basis for requiring 100% mitigation?

If 2.5% or less disturbance is acceptable (less than 16 acres) if 40 acres is disturbed, why wouldn't the requirement be to provide offsite mitigation for at least 25 acres instead of a flat 40 acres? Is the rationale that "sage-grouse population must be maintained or increased", so zero disturbance is acceptable?

Requiring 100% offsite mitigation implies total destruction of a disturbed area instead of reclamation. Disturbance may persist until reclamation has been accomplished, so there will be a time lag as discussed today.

-Question about what is acceptable "offsite mitigation" specifically for sage grouse? Offsite mitigation is a nice buzzphrase that sounds good, but as the saying goes, the devil is in the details. What exactly would be involved? (since the other area would presumably already be land that was undisturbed suitable habitat). What extra measures would be required specifically for sage grouse (e.g., purchase/acquisition of private fee lands)?

**George Brown, CME 0134**

**Geologist WO320**

**Washington Office BLM**

570-593-8659 (telework phone)

570-593-8659 (telework fax - call first - need to reset settings before sending a fax and be off the phone)

202-912-7118 (voicemail messages only)

202-245-0012 (M St. fax #1)

202-912-7199 (M St. fax #2)

**From:** [Thomas Remington](#)  
**To:** [Morales, Raul](#)  
**Subject:** Re: NTT Report (2nd Draft)  
**Date:** Monday, December 19, 2011 8:32:36 AM

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Raul, thanks, but I didn't see any attachments?

----- Original Message -----

**From:** [Morales, Raul](#)  
**To:** [Mermejo, Lauren L](#) ; [Sell, Robin A](#) ; [Rinkes, Earl T](#) ; [Wood, David](#) ; [Rose, Jeffrey A](#) ; [Pellant, Michael L](#) ; [Quamen, Frank R](#) ; [Bargsten, Travis D](#) ; [Havlina, Douglas W](#) ; [Figarelle, Mary](#) ; [Beecham, Charlie E](#) ; [Knick, Steven T](#) ; [Deibert, Pat](#) ; [dave.naugle@cfc.umt.edu](mailto:dave.naugle@cfc.umt.edu) ; [sespinosa@ndow.org](mailto:sespinosa@ndow.org) ; [jasonrobinson@utah.gov](mailto:jasonrobinson@utah.gov) ; [tony.apa@state.co.us](mailto:tony.apa@state.co.us) ; [don.kemner@idfg.idaho.gov](mailto:don.kemner@idfg.idaho.gov) ; [Perrin, Robert S](#) ; [christian.a.hagen@state.or.us](mailto:christian.a.hagen@state.or.us) ; [Kniola, Benjamin E](#)  
**Cc:** (b) (6)  
**Sent:** Saturday, December 17, 2011 11:22 AM  
**Subject:** NTT Report (2nd Draft)

Here is the 2nd draft of our NTT report. It is draft because the solicitors (as far as I can tell) like it that way.

There are big changes with the layout of this report as compared to the previous document. Based on comments from the solicitors and the independent science review team this draft reflects those comments. The solicitors were struggling with having a Policy recommendations piece in the NTT report due to ongoing negotiations with current litigants over a lawsuit affecting 16 BLM LUP's. So we removed the Policy recommendation piece from this draft report and instead we addressed those concerns through a letter from me to the NPT (see attachment). Overall the original intent of most of our conservation measures we developed in Denver are still the same. The wording describing some conservation measures is different, again to address solicitors concerns, but the intent is the same.

As a result of our science team review last week in Phoenix, there are a few major changes to the conservation measures from the 1st draft to this draft:

Recreation - removed measure about SRMAs.

Land Tenure - removed from Exception:

- \* Seek to acquire state and private lands with intact subsurface mineral estate by donation, purchase or exchange in order to best conserve, enhance or restore sage-grouse habitat.

Range Management - changed, re-ordered and revised several measures to clarify and reduce repetitiveness.

Minerals -

- \* Significant introductory discussion and rework of leased fluid mineral estate measures.
- \* Coal
  - \* deleted - Do not require offsite mitigation when the short-term effects are mitigated by the long-term benefits, for example, phased reclamation, (assuming sage-grouse can be restored [Musil et al. 1993, Reese and Connelly 1997, Baxter et al. 2008] to the area or if offsite mitigation demonstrates sage-grouse will be maintained in the population area).

Habitat Restoration

\* deleted - Surface disturbance resulting from wildfires may render a designated priority habitat as unsuitable for continued sage-grouse occupancy. Additional priority habitats may be designated to compensate for lost habitats until such time as the original priority habitats either recover or are restored and sage-grouse populations successfully re-established to pre-disturbance levels.

Monitoring section has been significantly updated.

Yesterday, Washington sent out the draft IM introducing the NTT conservation measures to the National Policy team for their review. The conservation measures were not sent out (solicitors need to review again). Goal is to have the final IM and conservation out to the Bureau during the holiday season.

I really believe this new draft is a significant improvement to our first draft and the science underpinnings for our conservation measures are much stronger. I again want to thank everyone involved in both drafts for their efforts and dedication to this effort. Now the fun is about to really begin as the public scoping meetings begin in early January and we will begin to see what the comments from the public will be!

Merry Christmas and Happy New year to all.

Raul Morales  
Deputy State Director Resources, Lands and Planning  
Bureau of Land Management  
775-861-6464 (p)

**From:** [Sell, Robin A](#)  
**To:** [Morales, Raul](#)  
**Subject:** NTT Science review  
**Date:** Friday, September 16, 2011 6:33:49 AM

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Hi Raul-

I know you are working to pull together a revised NTT document. Tom R mentioned it might be sent out for a quick NTT review before going to the National Policy Team- that would be great! My question, and maybe a suggestion... I don't feel like we really got into (or had time to discuss) the current science out there on SG... so I would like to propose that the researchers and biologists on the NTT – maybe a few other bios if appropriate- meet again in the next few months (maybe Nov/Dec) for about 3 days to have a frank discussion on various studies/papers out there... the good, bad & ugly so to speak. It would not have to hold up the current document we have worked on- the Policy and Regional ID teams can continue to work on their tasks- but a more concentrated and defensible overview of the science (all of it, to our ability) would be great justification for the RMP effort and an invaluable tool for more localized NEPA and project/management implementation. It would also help CO/UT with the upcoming GUSG listing – we will be referencing the same data sources anyway. My thought is, we can pull together the straight science side of things by end of January- do it right- and it will still inform and support 1) ongoing planning in all stages, and 2) cumulative effects report efforts. People can continue to move forward on the other teams, if we find with a more robust review of the science we need to tweak a few recommendations- there should still be time to do so, and I think it will better support and defend criticism down the line.

I will be in the office until at least 1pm today if you want to discuss quickly. The reality, the science folks were not going to have this kind of discussion with program leads in the group, and our timeline did not allow this review and scrutiny. But I think this kind of full disclosure will really benefit the Bureau, FWS, and SG down the road. Let me know what you think.

Robin  
303.239.3723

**From:** [Roberson, Edwin](#)  
**To:** [Lueders, Amy L](#); [Morales, Raul](#)  
**Subject:** Fw: Draft NTT report  
**Date:** Wednesday, November 09, 2011 7:13:02 AM

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FYI. SOL feedback.

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**From:** Russell, Gregory  
**Sent:** Wednesday, November 09, 2011 08:09 AM  
**To:** Roberson, Edwin  
**Subject:** RE: Draft NTT report

(b) (5)

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**From:** Russell, Gregory  
**Sent:** Wednesday, November 09, 2011 10:07 AM  
**To:** Roberson, Edwin  
**Subject:** FW: Draft NTT report

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**From:** Morales, Raul  
**Sent:** Monday, November 07, 2011 8:22 PM  
**To:** Roberson, Edwin  
**Cc:** Tague, Melvin J; Fielder, Dwight; Hallett, Hal; Russell, Gregory  
**Subject:** Draft NTT report

Alas, the long awaited NTT report. A small team of us completed changes to the report that reflected some of the review comments made by outside scientist commissioned by NDOW Director, Ken Mayer(see 2<sup>nd</sup> and 3<sup>rd</sup> attachments). The outside scientists only reviewed the Conservation Measures section of the report and not the Policy recommendations. Our team also only addressed the quick comments made by the science team. Some of the "longer" term comments made by the science team (i.e. space and time) were not addressed and can be discussed by the National Policy Team at some point to determine the need for our Conservation Measures to address some of the science "short falls" brought up by the science team.

Raul Morales  
Deputy State Director Resources, Lands and Planning  
Bureau of Land Management  
775-861-6464 (p)

**From:** [Sell, Robin A](#)  
**To:** [Wood, David](#); [Morales, Raul](#)  
**Cc:** [Quamen, Frank R](#); [Mermejo, Lauren L](#)  
**Subject:** RE: BLM Talking Points for the NTT Report  
**Date:** Friday, September 30, 2011 2:08:34 PM

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I agree with David's comments, wish I had time to spin off those and add a few more. Bottomline- the range ones in particular seemed way off base, and reflect very narrow interpretations of proposed conservation measures. In fact, in the range section, *most* of the measures proposed should reflect current management – not a new way of doing business. It worries me someone out there is sharing a much different message. If you are still taking comments in a few weeks, I'd be happy to provide my two cents worth.

---

**From:** Wood, David  
**Sent:** Friday, September 30, 2011 2:55 PM  
**To:** Morales, Raul  
**Cc:** Sell, Robin A; Quamen, Frank R; Mermejo, Lauren L  
**Subject:** RE: BLM Talking Points for the NTT Report

Hi Raul,

Based on our discussion I tried to provide some ideas and ways to improve these talking points. I think an approach that talks much more about restoring the balance and leads off with a discussion about how ongoing unchecked development has got us into the situation would be useful. Language still needs a lot of cleaning up and not spun to just talk about the negative. Until we can talk about the impacts to our program in a practical and realistic nature, we will not be able to avoid becoming victims of the standard fear mongering approaches taking these days. These are initial thoughts, did not have time to get into it too much more.

David Wood  
Conservation Biologist  
MT/Dakotas BLM State Office  
(406) 896-5246

---

**From:** Morales, Raul  
**Sent:** Tuesday, September 27, 2011 6:21 PM  
**To:** Beecham, Charlie F; Bargsten, Travis D; Figarelle, Mary; Havlina, Douglas W; Kniola, Benjamin E; Mermejo, Lauren L; Pellant, Michael L; Perrin, Robert S; Quamen, Frank R; Rinkes, Earl T; Rose, Jeffrey A; Sell, Robin A; Wood, David  
**Subject:** BLM Talking Points for the NTT Report

All, attached is what I have received to date. I have not modified anything, I just cut and pasted into the attached word document. Charlie, do you have any talking point for minerals that you would like to provide? Now that you can see what I have received if anyone would like to add/comment on the talking points please get them to me by the end of the week.