Fragmentation – Maintaining Intact GRSG Habitat

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
RMPA Vol.1 Pg. 2-14, Table 2-6 D-SSS 2 pg. 2-58 ; RMPA Vol. III Appendix G Habitat Disturbance Monitoring pg. G-6 & G-7 ; 3% human caused surface disturbance cap including current existing disturbance (not including fire) on public & private lands within the planning area within PPMA (see RMPA, VOL. 1, pg.2-14 & RMPA, VOL.111, Appendix G, pgs. G-6 &G-7 for explanations of habitat disturbance cap and proposed monitoring). Once the habitat disturbance cap is exceeded, no additional disturbance would be allowed on BLM in PPMA within the planning area. Mitigation would be mandatory for new human disturbance projects on BLM in PPMA & PGMA. Procedures are outlined for onsite & offsite mitigation analysis. (see RMPA VOL. 1 pgs. 2-23 & 2-24, terms and Acronyms reference sheet and RMPA VOL.111 Acronyms and Glossary pg.8-23). This alternative also describes Focal Areas within the planning area (public & private). Focal areas are a network comprised of three types of focal areas; Climate Change Refugia, High Density Breeding Areas, and Restoration Opportunity Zones. The BLM has identified these areas in order to help focus and prioritize habitat restoration, off site mitigation, conservation partnering, sage-grouse habitat and population monitoring and assessments, and post fire emergency stabilization and rehabilitation efforts, and to provide special consideration during fire suppression to help sustain productive sage-grouse habitat. (RMPA, Volume 11 pgs. 8-15 & 8-16 also volume 1 pgs. 2-14 & 2-17- 2-24. and Terms and Acronyms Reference Sheet)	Not addressed; This will need to be addressed in ALT.G seeing the only overarching direction is I.M. NO. 2012-043 GRSG Interim Management Policies and Procedures	The Rural Community Alternative (RCA) goal is to maximize the probability of maintaining current and improving potential sage-grouse habitat acres using periodic assessments of condition and trend combined within a temporally dynamic mitigation process. Habitat baseline, and human-caused disturbances and associated mitigation will be evaluated at the allotment scale. Baseline for allotments will be determined by mapping habitat condition as: 1) persistent non-habitat, 2) potential habitat, and 3) current habitat, within allotment. Baseline assessment will use state and transition models within the BLM CCA and the Harney County CCAA as a framework to determine habitat condition and trend. This assessment will also be used to determine wildfire/invasives risk as described in the "Wildfire Management" section below. Each habitat category will include an assessment of trend as described within the CCAA (e.g., "current habitat with declining trend" such as phase 1 juniper). Trend will be determined at 5 to 10 year intervals in association with Rangeland Health Assessment as described in the Livestock Grazing section below. Development is allowed under the RCA but human-caused disturbance will be mitigated, within allotment, on a scale consistent with development impacts on condition and trend of sage-grouse habitat. Human-caused disturbances in potential or current habitat would require improvement of 1) potential habitat to current habitat, or 2) current habitat with declining trend to current habitat with static or upward trend, on a scale consistent with the impact of the disturbance. The term "current" habitat is meant to apply to "year-around" or "seasonal" habitats within the state-and-transition models.	BLM proposes a 3% human-caused disturbance cap relating to disturbances that change land type. The exact definition of "disturbance" seems to be still in process. The Community Alternative suggests no net loss of sage-grouse habitat on public lands, which is consistent with the Harney County CCAA. The disturbance cap has minimal applicability to Oregon given that disturbance is less of an issue in Oregon that other areas with more human development. Additional Info: The RMPA does not provide any data on the current anthropogenic disturbance at any scale. This data is supposed to be available from the Rapid Ecoregional Assessment (REAs) which according to document was scheduled to be released the end of 2013. This should have been presented for the public to understand the possible ramifications of the 3% human caused disturbance cap for the planning area. Because it considers all ownership in setting the cap, BLM is again providing a disingenuous determination when it states the document only provides decisions on public lands. The only basis for the 3% presented is a single study in the vicinity of leks. This study indicated lek abandonment over time when the 3% disturbance level is reached (Knick et al. (2003) RMPA, pg. 3-12)

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Table 2-6, D-LG/RM1 pg. 2-79 Livestock aums allowed in the decision area would be 915,624 aums. 12,022,428 acres of public land open to livestock grazing on public lands. Close all Research Natural Areas (RNAs) which have over 20% PPMA and/ or 50% PGMA that are not meeting rangeland Health Standards and do not have a suitable rating consistent with Habitat Assessment Framework (HAF) or with values adjusted for regional conditions. Serve as a baseline for understanding the impacts of grazing vs. not grazing sage grouse habitat. RNAs would remain closed until documented as meeting Rangeland Health standards and a suitable HAF rating.	Livestock grazing aums allowed in the decision area is 924,617 12,121,617 acres open to livestock grazing on public land. BLM currently has this authority under grazing regulations 4130.3-3 which requires a decision issued to or a written agreement with the affected permittee. Also covered under grazing regs. 4180.1 Fundamentals of rangeland health.	Livestock AUMs in the decision area would be determined on the following basis: Close all Research Natural Areas (RNAs) which have over 20% PPMA and/ or 50% PGMA that are not meeting Rangeland Health Standards and livestock is a causal factor (as determined by a Rangeland Health Assessment conducted in the last five years in accordance with 43 CFR 4180). All RNAs which meet the criteria above would have appropriate indicators from Habitat Assessment Framework (HAF) incorporated into the Rangeland Health Assessment. Due to variability of some of the indicators in the HAF methodology (e.g., forb cover, stubble height), their application should be within the context of interannual trend (i.e., change over time) and site capacity as determined by ESDs. BLM would provide any additional fencing required to secure RNA boundary if needed to remove grazing, or would develop a voluntary cooperative agreement with affected permittee(s) to share costs and labor. These will serve as a baseline for understanding the impacts of grazing verses not grazing sage grouse habitat. RNAs would remain closed until documented as meeting Rangeland Health Standards. These determinations would be required as part of the grazing permit renewal process for the affected allotment.	Appropriate habitat assessment framework indicators would be used in Research Natural Areas (RNAs) when land is not meeting Rangeland Health Standards, when livestock are the cause of the problem, and when habitat is identified as important to sage-grouse. When using HAF, only those indicators appropriate to the identified problem will be incorporated. When RNAs are excluded from grazing RNA fencing would be **provided by the BLM or with a voluntary agreement with the permittee(s).**

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D-LG/RM 2, pg. 2-79 When renewing grazing permits or leases and revising and or drafting new AMPs within GRSG PPMA, incorporate habitat indicators and associated values consistent with HAF or with values adjusted for regional conditions, into management objectives and actions. This will be used to determine the habitat suitability for GRSG within PPMA.	Current RMPs are mostly general or silent on objectives for sage-grouse habitat. Current practice by BLM is to encompass habitat objectives and management considerations during permit renewal and Allotment Management Plans (AMPs) on all allotments that have sage-grouse habitat. Nothing specific in Interim management policies and procedures. I.M.	When renewing grazing permits or leases and revising and or drafting new AMPs within GRSG PPMA and PGMA, incorporate management objectives which address identified threats to GRSG habitat and describe desirable, measurable trends in vegetation/habitat condition. Management practices would be evaluated every 5 years in I category allotments and every 10 years in M category allotments for their effectiveness for and compatibility with reducing threats to GRSG habitat and achieving desired trends in habitat condition. Because objectives describe desired trends in habitat, the appropriate metric for habitat assessment is trend in indicators of habitat condition as detailed in Standard 5 of Rangeland Health Standards (43 CFR 4180). Methodology would be left to the individual Districts as long as the selected methodology is conducted consistently and measures trend (change) in appropriate indicators of habitat conditions.	Because the biggest threats to sage-grouse in Oregon are wildfire and invasive plants, monitoring methods associated with permit renewal will address specific identified vegetation problems (if any) as opposed to automatically focusing on sage-grouse-specific habitat metrics. Vegetation management will focus on trends in important indicators over time as opposed to point-in-time assessment.
D-LG/RM 2, pg. 2-79 The timing and location of livestock turnout and trailing should not contribute to livestock concentrations on leks during the GRSG breeding season.	No Specific Guidance in RMPs	Same as Alt. D: The timing and location of livestock turnout and trailing should not contribute to livestock concentrations on leks during the GRSG breeding season.	
D-LG/RM 3, pg. 2-79 Same as Alternative A	Work with permittee on allotment management planning and Allotment Rangeland Health Assessments	Derived from Alt. B: Within all GRSG habitats, work cooperatively on integrated ranch planning within GRSG habitat so operations on deeded property and BLM allotments can be planned as single units. If permittee has, or is in the process of implementing a CCAA on private land, BLM would coordinate public land grazing and	Community Alternative focuses on aligning Rangeland Health assessment and planning between public grazing lands in a CCA and private lands in a CCAA. This helps to build consistency in management and assessment and

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		rangeland monitoring under a CCA with willing permittees to implement conservation measures that would reduce or eliminate threats to GRSG across jurisdictions.	monitoring between public and private lands.
D-LG/RM 4 & D-LG/RM 6, pg.2-80 ; Same as current situation, Alt. A. Additional requirements are rangeland health assessments within PPMA must use habitat indicators and associated values that are consistent with HAF or with values adjusted for regional conditions to determine GRSG habitat suitability. (See RMPA VOL.111, Appendix G, pgs. G-8 & G-9). This would include managing grazing to provide residual cover of herbaceous vegetation consistent with habitat indicators and associated values found in HAF or as adjusted for regional conditions. (reader should review RMPA Vol111, Appendix G, Greater Sage Grouse Monitoring Framework to acquire an understanding of additional habitat inventory, assessment/ monitoring etc. proposed under this ALT.).	Rangeland health assessments are completed to determine if the Standards for Rangeland Health are being met and if Standards are not met identify the causal factors. Implement management to address the problems. If livestock grazing is the causal factor changes to grazing management must be implemented prior to the next grazing season. This is part of the grazing permit renewal process and incorporated in AMPs. Priority is directed by allotment management class (M,I, C). Categories are explained in chapter 3 of RMPA , VOL. 1, p.3-80.	Rangeland Health Assessments are completed to determine if the Standards for Rangeland Health (43 CFR 4180) are being met and if Standards are not met, to identify the causal factors. Implement management to address the problems. If livestock grazing is the causal factor changes to grazing management must be implemented prior to the next grazing season. This is part of the grazing permit renewal process and incorporated in AMPs. Priority is directed by allotment management class (M,I, C). Categories are explained in chapter 3 of RMPA , Vol. 1, p. 3-80. Appropriate indicators from the HAF protocol would be included in Rangeland Health Assessment for allotments within PPMA which have been determined by current rangeland monitoring studies to not meet Rangeland Health Standards and livestock is the causal factor. Due to variability of some of the indicators in the HAF methodology (e.g., forb cover, stubble height), their application should be within the context of interannual trend (i.e., change over time) and site capacity as determined by ESDs.	Current rangeland monitoring procedures continue unless specific rangeland health issues are identified; and when grazing is the cause of those issues appropriate Habitat Assessment Framework indicators would be considered. This would maximize the efficiency of monitoring and assessment efforts which are time intensive and costly.
D-LG/RM 5, pg. 2-80 Complete Rangeland health assessments by management category as described	Direction in current RMPs as described above and in chapter 3 of RMPA.	Complete Rangeland Health Assessments by management category as described in Alt. A and as	Community Alternative same as BLM preferred alternative.

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in Alt. A and as described above as part of the grazing permit renewal process. Additional Priorities for Rangeland Health assessments within management categories are; 1. Allotments or pastures in PPMA that have never been evaluated. 2. Allotments or pastures in PPMA that have not been evaluated in 10 or more years. 3. Allotments or pastures in PGMA that have never been evaluated. 4. Allotments or pastures within PGMA that have not been evaluated in 10 or more years.		described above as part of the grazing permit renewal process. Additional Priorities for Rangeland Health assessments within management categories are; 1. Allotments or pastures in PPMA that have never been evaluated. 2. Allotments or pastures in PPMA that have not been evaluated in 10 or more years. 3. Allotments or pastures in PGMA that have never been evaluated. 4. Allotments or pastures within PGMA that have not been evaluated in 10 or more years.	
Same as B D-LG/RM 7, pg. 2-81, Develop specific objectives to conserve, enhance or restore PPMA based on BLM ESDs and assessments (including within wetlands and riparian areas). If an effective grazing system that meets GRSG habitat requirements is not already in place, analyze at least one alternative that conserves, restores or enhances GRSG habitat in the NEPA document prepared for grazing permit renewal. (Doherty et. Al. 2011b; Williams et.al. 2011). The objective is to attain a suitable habitat rating that is consistent with HAF or with values adjusted for regional conditions. (see explanation of values adjusted for regional conditions RMPA, VOL. 111 Appendix G, pg. G-9).	Specific objectives that ensure rangeland health are analyzed in NEPA to renew grazing permits and AMPs.	Within PPMA develop specific management objectives to address threats to GRSG as identified by Rangeland Health Assessments. This would include wetland and riparian areas. Use BLM ESDs as a tool to ensure that objectives are consistent with site potential. If current grazing management does not address threats to GRSG habitat, analyze at least one alternative in the NEPA document prepared for permit renewal that would. (Doherty et. Al.2011b; Williams et. Al. 2011).	Grazing threat assessment for sage-grouse is driven by Rangeland Health standards as guided by site potential and appropriate HAF indicators **which should be applied within the context of interannual trend and site capacity as determined by ESDs in contrast to** strict adherence with HAF methodology.
D-LG/RM 8, pg. 2-81, Same as Alt. B In PPMA, manage for vegetation composition and	Manage under the Standards for Rangeland Health and Guidelines For Livestock	In PPMA, changes in plant community attributes would be measured over time to determine if the	At low elevations the term “reference state” in alternative D

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structure consistent with ecological site potential and within reference state to achieve GRSG seasonal habitat objectives.	Management for public lands in Oregon & Washington. Also IM-2012-043 GRSG Interim Management Policies & Procedures.	ecological state of the plant community is changing (transitioning) toward or away from desired GRSG habitat or remaining stable. This information is assessed along with annual monitoring to determine cause(s) of change which may be management or climatic or a combination of both. This would be the basis for determining if management is having the desired effect for GRSG habitat or if adaptive changes are needed.	means without annual grasses. That is unrealistic and was removed for the Community Alternative. Focus of Community Alternative is on determining trend in vegetation and what factors are driving that trend as the basis for vegetation management.
D-LG/RM 9, pg. 2-81&2-82, Implement management actions described under ALT. B to meet GRSG seasonal habitat requirements in PPMA & PGMA where rangeland health standards are not being met. This would be done to achieve a suitable rating consistent with HAF or with values adjusted for regional conditions. Implement management actions (grazing decisions, AMP/Conservation Plans, or other agreements to modify grazing management to meet seasonal GRSG habitat requirements. (Conelly et.al.2011b). Consider the following changes in: 1 season or timing of use 2 Numbers of livestock(includes temporary nonuse or livestock removal 3 Distribution of livestock use 4 intensity of use 5 Type of livestock 6 Adjustments in allowable use levels 7. Extended rest or temporary closure from grazing 8. Permanent closure to grazing	Same guidance as described above. The actions outlined under Alt. G & A are also covered currently under grazing regulations.	When Rangeland Health Standards are not being met and livestock is the causal factor in PPMA &PGMA; implement grazing management actions (grazing decisions, AMP/conservation plans, or other agreements to modify grazing management to address threats to GRSG habitat (USFWS 2013…COT report). Consider singly or in combination: changes in season of use; timing or intensity of use; changes in numbers, including temporary nonuse or livestock removal; and changes in distribution or type of livestock.	Alterations to grazing management done only when grazing is determined to be a factor in not meeting Rangeland Health Standards. Rangeland Health drives management decisions as opposed to the Habitat Assessment Framework.

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D-LG/RM 10: pg. 2-82&2-83, During drought conditions, make the principal focus to maintain long- term health and productivity of public rangelands in PPMA. Follow current W.O. guidance for drought. To determine drought conditions use a recognized drought indicator such as Drought Monitor, Palmer Drought Severity Index. Actions are similar to description under Alt. A. except; When drought conditions appear to be easing and prior to reauthorizing livestock grazing a BLM I.D team will evaluate vegetation conditions utilizing methods that measure habitat suitability, particularly in breeding and nesting areas to determine whether current vegetation conditions can support livestock grazing and GRSG habitat needs. This will be coordinated with ODFW.	During drought standard procedures for BLM; Provide permittees with written notice on severity of drought and that adjustments may be required. Pre turnout adjustments made with permittee and BLM ID team as a result of Allotment drought inspection. BLM monitors utilization through grazing season. Often results in accelerated livestock moves and or shorter season or nonuse depending on drought severity. Some specific guidance for GRSG in I.M.2012-043 GRSG Interim Management Policies and Procedures.	During drought, standard procedures for BLM are to provide permittees with written notice on severity of drought and that adjustments may be required. Pre-turnout adjustments are made with permittee and BLM ID team as a result of an allotment drought inspection. BLM monitors utilization through grazing season, which often results in accelerated livestock moves and or shorter season or nonuse, depending on drought severity. Prioritize evaluating effects of drought in PPMA, relative to GRSG needs for food and cover. Since there is a lag in recovery following drought, ensure post drought management allows for vegetation recovery that meets GRSG needs in PPMA. When drought conditions appear to be easing in PPMA habitat an allotment drought recovery inspection would be completed by BLM RMS and or I.D. team with the affected permittee. Provide written documentation of agreed actions. This would be completed before next grazing licensing period.	Rural Community Alternative increases involvement of permittee in decisions regarding drought management and does not involve the use of a drought index. A drought index (e.g. Palmer Drought Severity Index) may or may not reflect conditions on the ground because most will not account for the effects of timing of precipitation, which could be more important than precipitation amount.
D- LG/RM 12, pg. 2-83, Manage riparian and wet meadows to maintain species composition for the given ecological site. Include habitat objectives in AMPs and or activity plans; 1 Maintain sufficient cover for broods both along edges and within meadows. 2 Manage lotic and lentic riparian community succession in an upward trend to achieve PFC.	Manage riparian area and wet meadows for proper functioning condition with livestock management that is at PFC or trending towards PFC.	Same as Alt. A: Manage riparian area and wet meadows for proper functioning condition with livestock management that is at PFC or trending towards PFC. Moderate livestock grazing in these habitats may improve sage-grouse use and access to important food plants (Crawford et al. 2004).	Objective relating to brood rearing cover in riparian areas is excluded in Community Alternative because moderate amounts of grazing in these habitats may improve sage-grouse use and access to important food plants (Crawford et al. 2004).
D-LG/RM 16: pg.2-83, Authorize new and relocate or modify range improvements using seeps or springs as a water source to enhance functionality during time periods that livestock are absent from	Water developments are analyzed in a NEPA documents typically at project level or as part of an activity plan to determine environmental impacts	Authorize new and relocate or modify range improvements using seeps or springs as a water source to enhance year-around functionality. Retrofit with bird escape ladders if absent. Maintain, enhance	Authorize new and relocate or modify range improvements using seeps or springs as a water source to enhance year-around

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the allotment. Retrofit with bird escape ladders if absent. Maintain, enhance or reestablish riparian areas located within PPMA, PGMA as well as areas in the sagebrush biome outside of GRSG	Also GRSG Interim Management Policies & Procedures I.M. No. 2012-043	or reestablish riparian areas located within PPMA and PGMA. BLM would provide for all costs and or develop a voluntary cooperative agreement with affected permittee(s) to share costs and labor. Water developments are analyzed in a NEPA documents typically at project level or as part of an activity plan to determine environmental impacts.	functionality. Retrofit with bird escape ladders if absent. Maintain, enhance or reestablish riparian areas located within PPMA and PGMA. BLM would provide for all costs and or develop a voluntary cooperative agreement with affected permittee(s) to share costs and labor.
Action D-LG/RM 20, pg. 2-84: For playas, wetlands, and springs that have been hydrologically modified for livestock watering, identify those water improvements that have population limiting implications, and develop plans for rehabilitation. Further actions should be instigated for development of water off site; new water should be available before existing water is eliminated. Assist in surveillance with ODFW if an outbreak of West Nile virus is discovered		BLM would provide funding and labor for water development off site for playas, wetlands and springs that have been hydrologically modified for livestock where the agency determines the development is the cause of GRSG. population limiting implications. The agency may attain voluntary cost sharing through a CCA agreement and or a range improvement cooperative agreement with the allotment permitte(s)to enhance GRSG habitat.	Similar to Alt. D except provides methods to pay for labor and materials to develop offsite water.
D-LG/RM 20 &21, pg. 2-84, Assist in surveillance with ODFW if an outbreak of West Nile virus is discovered. Evaluate feasibility of mosquito control including; Mitigate water sources, change irrigation techniques from flood to sprinkler systems, control water overflow, use larvicides and evaluate the effectiveness for spraying for adult mosquitos and consider mosquito specific insecticide.	No RMP guidance	Assist in surveillance with ODFW if an outbreak of West Nile virus is discovered. Evaluate feasibility of mosquito control including; Mitigate water sources, use of larvicides and evaluate the effectiveness for spraying for adult mosquitos and consider mosquito specific insecticide. BLM will ensure adequate water for current livestock authorizations and provide for all costs and or develop a voluntary cooperative agreement with affected permittee(s) to share costs	Rural Community Alternative same as BLM preferred alternative but adds language to obligate BLM to cost share associated activities and strikes language referencing flood and sprinkler irrigation (which are not relevant rangeland activities). Additional info: This demonstrates duplicity of thought patterns when

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		and labor.	this is compared to predator control. The mosquito is an insect pest and falls under the auspices of APHIS for control and treatment on public lands. However BLM was empowered to provide possible solutions. This might be applicable to predator discussion. Also see Im-2012-043 pg. 6 to see how pests are managed on public land.
D-LG/RM 22: pg. 2-85 In PPMA forage enhancement treatments must also conserve, enhance or restore GRSG habitat in order to be authorized.	All proposed vegetation treatments are analyzed in a NEPA document to determine environmental impacts. No current requirement in RMPs.	Vegetation treatments in PPMA must provide a long term net benefit to GRSG habitat.	Community Alternative very similar to BLM Preferred Alternative but wording changed slightly **to provide BLM more flexibility to improve GRSG habitat.**
D- LG/RM 23: pg.2-85, Same as B Evaluate existing seedings that are composed of primarily introduced perennial grasses in and adjacent to PPMA to see if they should be restored to sage brush habitat. If seedings are part of an AMP or a conservation plan or they provide value in conserving or enhancing the rest of the PPMA, then no restoration would be necessary. Assess the compatibility of these seedings for GRSG habitat or as a component of a grazing system during rangeland health assessments. (Davies et al. 2011).	Most RMPs silent	Same as D & B: Evaluate existing seedings that are composed of primarily introduced perennial grasses in and adjacent to PPMA to see if they should be restored to sage brush habitat. If seedings are part of an AMP or a conservation plan or they provide value in conserving or enhancing the rest of the PPMA, then no restoration would be necessary. Assess the compatibility of these seedings for GRSG habitat or as a component of a grazing system during rangeland health assessments. (Davies et al. 2011).	Community Alternative same as BLM Preferred Alternative.
D-LG/RM 24: pg.2-85, Same as B In PPMA design all new structural range improvements and locations of supplements (salt or	All Structural range improvements are analyzed in a NEPA document as described for vegetation Treatments	In PPMA design all new structural range improvements and locations of supplements (salt or protein blocks) to maintain or enhance GRSG habitat through an	Preferred alternative expanded in Rural Community Alternative to include cooperative processes.

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protein blocks) to conserve, enhance or restore GRSG habitat through an improved grazing management system relative to GRSG objectives. Invasive species should be monitored and treated post construction.		improved grazing management system relative to GRSG objectives. Invasive species should be monitored and treated post construction. Develop cooperatively through CCA process with willing permittee(s) to monitor and treat invasive species post construction of new structural range improvements.	
D-LG/RM 25: pg.2-86, Same as B In PPMA, evaluate existing structural range improvements and location of supplements (salt or protein) to make sure they conserve, enhance or restore GRSG habitat.	RMPs silent on this issue.	In PPMA, evaluate existing structural range improvements and location of supplements (salt or protein) to make sure they maintain or improve GRSG habitat.	
D-LG/RM 26: pg. 2-86, Same as B To reduce GRSG strikes and mortality, remove, modify, or mark fences in high risk areas within PPMA based on the proximity to lek, lek size and topography.	Limited Guidance in RMPs; GRSG Interim Management Policies and Procedures IM-2012-043.	To reduce GRSG strikes and mortality, remove, modify, or mark fences in high risk areas within PPMA based on the proximity to lek, lek size, and topography. Create cooperative actions through CCA process for affected willing permitee to accomplish voluntary installation.	Same as BLM preferred alternative but with cooperative processes.
B-LG/RM 27: pg. 2-86, No action Alt. B states; In PPMA, monitor and treat invasive species associated with existing range improvements.	No specific guidance in RMPs. This would be addressed in project level NEPA.	Same as B with the following addition; Create cooperative actions through CCA process to monitor and treat invasives species with willing permittee(s) in PPMA, associated with existing range improvements when possible.	Same as Alt B. with cooperative processes added.
D-LG/RM 28: pg. 2-86, Same as Alt. B Maintain retirement of grazing privileges as an option in PPMA when current permittee is willing to retire grazing on all or part of an allotment. Analyze the adverse impacts of no livestock use on wildfire and invasive species threats. (Crawford et. Al. 2004) in evaluating retirement proposals.(reviewer comment: This narrows the scope of NEPA; i.e. no economic analysis required and agency does not	Would require RMP plan amendment in addition to NEPA analysis. Also have to meet requirements of the Taylor Grazing Act within grazing districts and FLPMA if over 100,000 acres. I.M. No. 2013-184 Relinquishment of Grazing Permitted Use on BLM administered Lands.	The option of retiring grazing privileges in PPMA should be removed from the Draft RMPA. Under Alt. A, BLM currently has adequate process to provide for relinquishment of grazing permits.	See Rural Community Alternative. Additional info: Under Alt. D, BLM would be allowed to retire grazing without a plan amendment. It would not have to analyze the economic impacts on other operators and cumulative effects on the rural communities. There

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have to amend RMP for this action).			also maybe no conflicts with GRSG from grazing in an allotment offered for relinquishment. BLM currently has adequate process to provide for relinquishment of grazing permits.
D-LG/RM 30: pg. 2-86,No Action (only pertains to Alt. E) This is not according to current policy therefore BLM chose not to encompass in the preferred ALT. D.	No RMP guidance, currently at AMP or activity level.	No Action	
D-LG/RM 29 &31: pg. 2-86, No Action (Only pertains to Alt. F) This would not be economically viable for BLM so they did not encompass it in the preferred ALT. D	No Current guidance	No Action	
D-LG/RM 32: pg. 2-86, Avoid supplemental winter feeding of livestock in PPMA & PGMA unless it is part of a plan to improve ecological health or to create mosaics in dense sagebrush stands that are needed for optimum GRSG habitat.	Supplemental winter feeding is covered by grazing regulations and current policy.	Same as Alt. A: Supplemental winter feeding is covered by grazing regulations and current policy. **43 CFR 4130. 3-2 (c).**	

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
RMPA Vol. 1, Table 2-6, D-WFM1: pg.2-69, Fuel management actions are detailed in Appendix H, Greater Sage-Grouse Wildland Fire and Invasive Species Assessment, Volume 111 of RMPA. Develop a system of fuel breaks to protect larger intact blocks of sage-grouse habitat. Locate along existing roads and rights of way when possible. Treat GRSG habitat to reduce the probability of large homogeneous burn patterns and unacceptable wildfire effects, to limit juniper encroachment, and to control invasive species. Treatment assessment should include evaluation of acceptable wildfire effects and recovery and use of unplanned naturally ignited fires. Complete an interagency landscape-scale assessment to prioritize at – risk habitats and identify fuels management, preparedness, suppression, and restoration priorities.	See chapter 3 for current situation; Also review Table 2-6 to see full array of actions between Alternatives. We have highlighted some major actions in this Table with emphasis on Alt.D, the preferred Alternative. Through the analysis of alternatives BLM is clear that GRSG habitat will be given priority for suppression, fuel management projects and Emergency Stabilization and Rehabilitation. It is unclear how the agency will reduce the size, scope and frequency of wild fires. Analysis fails to clearly address direct methods to lessen frequency & intensity through treatment of invasives, effects of suppression priorities on other public lands, response time for initial attack, no changes in use of tools, tactics or methods and changes to delegation of authority to suppression Incident commanders, no mention of Use of Rural Fire Associations or changes in suppression methods on special designation lands. (see RMPA, VOL.1 pg.ES-11 and RMPA, VOL. 11, pg.5-30).	Use state and transition models within the BLM CCA and the Harney County CCAA as a framework to organize and apply the wildfire risk assessment (Appendix H). This process should include both the risk of wildfire based on current vegetation conditions and the potential consequences of fire to sage-grouse habitat, which will vary strongly according to ecological setting and current plant community condition. This process should result in landscape scale risk reduction and employ fuels management and other techniques appropriate for the Ecological Site. BLM will develop fire management plans to address major threats to sage-grouse habitat including cultural, administrative, logistical, and programmatic barriers and limitations (e.g., See WAFWA 2013). As part of this process, BLM will: 1) determine fuels management and fire suppression priorities without consideration of administrative land designation; 2) delegate authority to the Incident Commander for the purpose of the most immediate suppression of wildland fire **(regardless of administrative land designation)** using the best tactics, methods, and tools available, applied in a safe manner; 3) encourage the formation, assist in the use and training (**with federal firefighting qualifications)** of Rangeland (Rural) Fire Protection Associations for deployment and initial attack on public lands in their given areas**(empower Association with delegation of authority as described in 2 above for Incident Commander)**; and 4) share results from risk assessment and prioritization process with Rangeland Fire Protection Associations; and 5) encourage additional planning, coordination and pooling of funding with the noxious weed program.	Wildfire and invasives are the top two threats for sage-grouse in Oregon. Thus if these threats are not analyzed the RMP does not meet its purpose and need. The Community Alternative addresses these threats by suggesting a process to thoroughly review wildfire risk, associated consequences, and operational barriers within the RMP. Additional info: There are other omissions or items not adequately covered in Alt D. (i.e. deployment or remote stationing during lightening events, Strategic use of grazing to remove fine fuels and disrupt fuel continuity.

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
D-WFM 6: pg. 2-71, Allows use of livestock as a tool but does not acknowledge or elaborate on grazing as a tool.	Available under current RMPs but not directed.	The Wildland Fire and Invasive Species /Juniper encroachment Assessment **which should be analyzed in the RMPA** would incorporate livestock grazing as a tool for wildfire and invasive species management (Davies et al. 2009, Diamond et al. 2009, 2012)	Livestock grazing allowed in Rural Community Alternative as a fuels management tool.
D-WFM 7: pg.2-79, Same as B In PPMA, prioritize suppression, immediately after life and property, to conserve habitat.	Current direction life & Property have priority for suppression then resources. Resource protection priorities are identified at a district planning level except for special designations. (i.e. WSAs, wilderness)	Conduct wildfire risk assessment using State and Transition Models within the BLM CCA and the Harney County CCAA. This process should include both the risk of wildfire based on current vegetation conditions and the potential consequences of fire to sage-grouse habitat, which will vary strongly according to ecological setting and current plant community condition. This process should result in landscape scale risk reduction and employ fuels management and other techniques appropriate for the Ecological Site. BLM will develop fire management plans to address major threats to sage-grouse habitat including cultural, administrative, logistical, and programmatic barriers and limitations (e.g., See WAFWA 2013). As part of this process, BLM will: 1) determine fuels management and fire suppression priorities without consideration of administrative land designation; 2) delegate authority to the Incident Commander for the purpose of the most immediate suppression of wildland fire using the best tactics, methods, and tools available, applied in a safe manner; 3) encourage the formation, assist in the use and training of Rangeland (Rural) Fire Protection Associations for deployment and initial attack on public lands in their given areas; and 4) share results from risk assessment and prioritization process with Rangeland Fire Protection Associations; and 5) encourage additional planning, coordination and pooling of funding with the noxious weed program.	This process would result in ecologically-based prioritization of fuels management and suppression activities across private and public lands, while minimizing operational barriers to implementation. This assessment and accompanying recommendations must be analyzed in the RMPA as action items.
D-WFM 8: pg. 2-72, Within GRSG habitat (PPMA &PGMA), prioritize protection as follows: 1. Nesting habitat within 3 miles of	Same as described above	Conduct wildfire risk assessment using State and Transition Models within the BLM CCA and the Harney County CCAA. This process should include both the risk of wildfire based on current vegetation conditions and the potential consequences of fire to sage-grouse habitat, which will vary	Fire suppression is a tactical enterprise that should be driven by a comprehensive analysis of

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
a lek 2. GRSG winter range 3. PPMA Incorporate these locations into the Fire dispatch system. Provide local GRSG habitat maps to dispatch offices and initial Attack Incident Commanders for use in prioritizing wildfire suppression resources and designing suppression tactics.		strongly according to ecological setting and current plant community condition. This process should result in landscape scale risk reduction and employ fuels management and other techniques appropriate for the Ecological Site. BLM will develop fire management plans to address major threats to sage-grouse habitat including cultural, administrative, logistical, and programmatic barriers and limitations (e.g., See WAFWA 2013). As part of this process, BLM will: 1) determine fuels management and fire suppression priorities without consideration of administrative land designation; 2) delegate authority to the Incident Commander for the purpose of the most immediate suppression of wildland fire using the best tactics, methods, and tools available, applied in a safe manner; 3) encourage the formation, assist in the use and training of Rangeland (Rural) Fire Protection Associations for deployment and initial attack on public lands in their given areas; and 4) share results from risk assessment and prioritization process with Rangeland Fire Protection Associations; and 5) encourage additional planning, coordination and pooling of funding with the noxious weed program.	fire risk, habitat value, and logistical capabilities. Areas that are not currently sage-grouse habitat may have high tactical value to preventing fire on a landscape basis. This analysis must be included in the RMPA.
No Change See Table 2-6, pgs. 2-72&73 WFM 10 WFM11 WFM 12 WFM13	Suppression tactics and tools are outlined by national policy in Interagency Standards for Fire Operations (Red Book). This is further regulated by policy on what tools can be used for suppression based on policy for resource concerns and most importantly special designations (i.e. WSAs, Wilderness,RNAs ACECs) Also there is delegation of Authority letters which	These items would be as described in ALT D Table 2-6 WFM 10 WFM11 WFM 12 WFM13 However the following current management flaws need to be addressed as follows: Delegation of authority to the Incident Commander for the purpose of the most immediate suppression of wildland fire using the best tactics,	All directives under the Rural Community Alternative would apply the Delegation of Authority to the wildfire Incident Commander for the most immediate suppression of wildland fire using the best and

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
	provides suppression incident commanders information on what level of line officer can make the decision for tools & tatics to use for suppression on special designation areas.	methods, and tools available applied in a safe manner and regardless of administrative land designation.	most applicable tactics, methods, and tools available applied in a safe manner regardless of administrative land designation. Protection of life, then property followed by resources with PPMA sage-grouse habitat primary among resources.
D-WFM 17: pg. 2-73, Same as A except outlines that all fires 100 acres or more need to be evaluated for rehabilitation. It also outlines four specific needs to be determined: 1. Increased plant cover relative to ecological site capability. 2. Invasive species control needs 3. wind or water control needs 4. Increased abundance of native plant species to meet GRSG habitat needs.	Emergency Stabilization and Rehabilitation is guided by BLM policy available in national handbook and on line. Current guidance is ecologically based and does not provide emphasis for certain species.	Emergency Stabilization and Rehabilitation is guided by BLM policy available in national handbook and on line. Current guidance is ecologically based and does not provide emphasis for certain species. Additionally incorporate from Alternative D; all fires 100 acres or more need to be evaluated for rehabilitation. Alternative D also outlines four specific needs to be determined: 1. Increased plant cover relative to ecological site capability. 2. Invasive species control needs 3. wind or water control needs 4. Increased abundance of native plant species to meet GRSG habitat needs.	The Rural Community Alternative is a combination of current policy with suggested priorities for identifying critical restoration needs.
D-WFM 32: pg. 2-75& 2-76, BLM districts in coordination with USFWS and relevant state agencies, would complete GRSG Landscape Wildfire & Invasive Habitat Assessments by December 2014. This assessment will prioritize at risk habitats, identify fuels management,	No current Guidance except generic guidelines in the IMs listed previously. The assessment outlined under D the preferred Alt. will detail what fuels work, suppression activities, at risk fire areas, what will be done for treating invasives and outline restoration guidelines at the BLM district level.	**Again, need to encompass this as part of the Wildfire, Invasives/Juniper Encroachment Assessment which needs to be analyzed in the RMPA. That is the only way an analysis/plan will get done to change the habitat projections in the current chapters 4 & 5.** Conduct wildfire risk assessment using State and Transition Models within the BLM CCA and the Harney County CCAA. This process should include both the risk of wildfire based on current vegetation conditions and the potential consequences of fire to sage-grouse habitat, which will vary strongly according to ecological setting	Community Alternative differs from BLM preferred alternative in that it incorporates vegetation models from the CCA and CCAA that allow for management decisions based on best available

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
preparedness, supression and restoration priorities. Implementation actions would be based on this assessment. See Appendix H volume 3 RMPA to view framework of this assessment.		and current plant community condition. This process should result in landscape scale risk reduction and employ fuels management and other techniques appropriate for the Ecological Site. BLM will develop fire management plans to address major threats to sage-grouse habitat including cultural, administrative, logistical, and programmatic barriers and limitations (e.g., See WAFWA 2013). As part of this process, BLM will: 1) determine fuels management and fire suppression priorities without consideration of administrative land designation; 2) delegate authority to the Incident Commander for the purpose of the most immediate suppression of wildland fire using the best tactics, methods, and tools available, applied in a safe manner; 3) encourage the formation, assist in the use and training of Rangeland (Rural) Fire Protection Associations for deployment and initial attack on public lands in their given areas; and 4) share results from risk assessment and prioritization process with Rangeland Fire Protection Associations; and 5) encourage additional planning, coordination and pooling of funding with the noxious weed program.	knowledge of plant community response to disturbance and management factors. **It also mandates that BLM provides this assessment in the RMPA to provide the public with an analysis of the primary threats to the bird.**
D-WFM 34: pg. 2-76, In coordination with USFWS and relevant state agencies, BLM districts would identify annual needs for wild fire and invasive species management as identified in and by updating this assessment and plan. Annual treatment would be coordinated across state and regional scales and across jurisdictional boundaries for long term conservation of GRSG. There would be an annual review of	No current guidance	Same as Alternative D **Except expand to include coordination with county and other cooperating agencies.**	Describes annual implementation/review of wildfire and invasive plant management.

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
landscape assessment implementation with appropriate USFWS and state agency personnel. (WFM 34 &35) table 2-6 RMPA			
D-WFM 38: pg. 2-77, No change	BLM is directed by policy to use a full range of fuel reduction techniques in fuel projects. These techniques include prescribed fire, grazing, herbicide, biological and mechanical. It is limited by policy on tools that can be used in certain designations i.e. WSAs, Wilderness, RNAs,ACEC, proximity to fish habitat etc.	Use of fuel reduction techniques should not be limited by policy. The limiting of these treatments has direct negative impacts to GRSG habitat. Limiting of the application of these techniques should be directed by regulation or law.	Rural Community Alternative same as BLM Preferred Alternative except that use of tools is not limited on lands with administrative designations (e.g., WSAs).

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
Table 2-6, D-WHB 1: pg. 2-68, Within PPMA review existing HMAPs to incorporate GRSG habitat objectives and management objectives for all HMAs.	Current RMPs address ecological balance no species specific requirements for GRSG. Some general guidance in IM-2012-043.	Within PPMA review existing HMAPs to evaluate threats to GRSG habitat in all HMAs. **The GRSG specific objectives will be included in allotment objectives. The GRSG objectives from allotments within an HMA would be included in the HMAP and assessed as part of Rangeland Health Assessments.** Assist in surveillance with ODFW if an outbreak of West Nile virus is discovered. Evaluate feasibility of mosquito control including; at any opportunity, such as when wild horses are gathered, test them for West Nile virus, as they are confirmed vectors of the disease. Report results to Oregon Health Standards.	GRSG specific objectives will be included for allotments with GRSG habitat within a Herd Management Area (HMA). The Herd Area Management Plan (HMAP) will be updated as part of rangeland Health Assessments for the allotments in the HMA.
D-WHB-2: pg.2-68, For all HMAs within PPMA, an I.D. team would prioritize the evaluation of AMLs based on indicators that address structure, condition, and composition of vegetation and measurements specific to achieving GRSG habitat objectives that attain suitable habitat assessment framework (HAF) rating. The priorities for conducting evaluations are: 1. The portions of HMA in PPMA 2 .The portions of HMA that are in PGMA 3. All other areas Modify AML based on rangeland health analysis and monitoring data if GRSG habitat objectives are not being met. Funding priorities are established nationally and subject to change due to escalating issues or emergencies. The priorities for gathers are the same as described for evaluations above. Gathers can be conducted in priority 2 & 3 areas ahead of PPMA to prevent impacts on rangeland health, including herd health impacts. Modify the AML based on the rangeland health analysis and monitoring data if GRSG habitat objectives are not being met.	Current RMPs address ecological balance with limited species specific guidance for GRSG. Guidance under IM - 2012-043.	Wild horse use is considered and analyzed as part of Rangeland Health Assessments which would be the basis of evaluations. BLM could pool cross-program resources by completing these assessments for an HMA which has PPMA habitat. Only those allotments within an HMAs which do not meet the standards for rangeland health, with wild horses being a causal factor, would incorporate appropriate HAF indicators. Due to variability of some of the indicators in the HAF methodology (e.g., forb cover, stubble height), their application should be within the context of interannual trend (i.e., change over time) and site capacity as determined by ESDs. The priorities for conducting evaluations would be as described in Alt. D. The overarching threat to sage-grouse habitat from wild horses is overgrazing due to BLM's current inability to manage the Herd Management Areas at the Appropriate Management Level. BLM must analyze this in RMPA.	Rural Community Alternative differs from BLM Preferred alternative in that HAF indicators are incorporated into Rangeland Health Standards as opposed to being a standalone tool.

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
D-VG 32, Table 2-6, pg., 2-66 In general, treatment priorities* should be: 1. New infestations 2. Satellite populations 3. Isolated populations 4. Invasive species still subdominant 5. Edges of large infestations 6. Sites frequently used for temporary infrastructure such as incident base camps, spike camps, staging areas, helispots and so forth. *Not in priority order D-VG 33 Allowable methods of invasive plant control include mechanical, chemical, biological, or prescribed fire methods or combination of these methods. (Fire section mentions grazing)	Current policy and guidelines; BLM has only recently (within last 2 years) been allowed use of herbicides which can control annual invasive grasses as well as many noxious weeds. The list of approved herbicides is still very limited and BLM is still in the process of completing step down NEPA to allow broad scale application. Medusahead is the only annual grass considered to be a noxious weed by the agency. Currently there is not a policy in place for targeting the treatment of cheatgrass. There is no herbicide program unless the species is in association with Medusa head. Strategic grazing as a control tool is only in use on a small scale and considered experimental. Covered under IM.-2012-043 GRSG Interim Management Policies and Procedures	D-VG 32, Table 2-6 In general, treatment priorities* should be: 1. New infestations 2. Satellite populations 3. Isolated populations 4. Invasive species still subdominant 5. Edges of large infestations 6. Sites frequently used for temporary infrastructure such as incident base camps, spike camps, staging areas, helispots and so forth. *Not in priority order D-VG 33 Allowable methods of invasive plant control include mechanical, chemical, biological (grazing), or prescribed fire methods or combination of these methods. (Fire section mentions grazing) Treat wildfire, invasives (including noxious weeds) and juniper encroachment cohesively as threats to GRSG habitat. The agency would analyze in the RMPA an assessment of wildfire, invasives /juniper encroachment as it is outlined in Appendix H.	Community Alternative broadens the scope of BLM Preferred Alternative and includes management of encroaching juniper. The notion of "invasive species" should be thought of more broadly to include expanding native native species such as western juniper that can negatively impact sage-grouse habitat. It also includes the assessment of wildfire, Invasives and juniper encroachment in the RMPA. Additional info: The strategy for GRSG habitat management in this draft RMPA has no clear priorities between the fire program and the noxious weed program. Also juniper is addressed in the fuels treatment but because it is not considered an invasive it is only dealt directly in the Vegetation Habitat Restoration and fuel management. (see Appendix H, Vol.3 pg.H-1-8
D-VG 35: pg.2-66, Use of approved herbicides, biocides, and bio-controls is allowed on all land allocations currently providing or reasonably expected to provide GRSG habitat. Same as alternative A. (Statement accurate however practical delivery for control on special land designations may not be	Described above and Alt. D	D-VG 35 Similar to Alt. D with additional regulatory Mechanism. Use of approved herbicides, biocides, and bio-controls is allowed on all land allocations currently providing or reasonably expected to provide GRSG habitat. (BLM Wilderness does not allow aerial or mechanical application and mechanical may not be allowed in WSAs). Also	**BLM should provide practical application methods to control invasives and noxious weeds on all GRSG habitats regardless of special designations. This alternative provides a regulatory mechanism to allow agency access current technology to reduce invasive species and noxious weeds in GRSG and potential GRSG habitat. This would be analyzed in the RMPA.**

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
possible i.e. WSAs, Wilderness does not allow aerial or mechanical application).		add grazing and provide for a practical delivery of controls on all public land including special designations within GRSG habitat. BLM also needs to include a regulatory mechanism to provide current technology (i.e. herbicides, biocontrols, biocides) to reduce threats to GRSG habitat and potential habitat by invasive species and noxious weeds.	
D-VG 41: pg. 2-67 Minimize cross country travel through invasive plant infested areas during emergency and planned operations, such as during wildfire response; spot applying herbicides to invasive plants, conducting vegetation inventory and so forth.	Cross country travel by vehicle authorized except in designated lands. (i.e. WSAs, Wilderness)	Same as Alt. D, but should be comprehensive and include other spread vectors (see Davies and Sheley 2007), not just minimize cross country travel through invaded areas. D-VG 41 Minimize cross country travel through invasive plant infested areas during emergency and planned operations, such as during wildfire response; spot applying herbicides to invasive plants, conducting vegetation inventory and so forth.	

Travel Management

(Only brief summary provided here – see table 2-6 for comparisons.)

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative
Table 2-6 B&D-TM 1: pg.2-89, In PPMA, limit motorized travel to existing roads, and trails at a minimum, until such time as travel management planning is complete and routes are either designated or closed. Approx. 4,546,897 acres closed to off road use. Same as Alt. B, as well as the following:. A final travel management plan due within 5 years of RMPA completion. Areas in PPMA currently managed as closed would remain closed. Areas in PPMA, aside from those closed would become limited OHV areas. The extent and intensity of OHV use should be assessed, as appropriate, Prior to travel management planning.	RMPs outline where off road travel is allowed and not allowed. Much of the decision area is currently open to OHV use. Also see GRSG Interim Management Policies and Procedures IM-2012-043.	RMPs outline where off road travel is allowed and not allowed. Much of the decision area is currently open to OHV use. Also see GRSG Interim Management Policies and Procedures IM-2012-043. Seasonal closure of off road use in PPMA (March 1-June 30) for breeding & nesting protection and closure of some roads to general public 0.6 miles from major leks during breeding season. This would not encompass authorized activities (i.e. emergency activities, BLM vegetation management and required permittee livestock management). Other exceptions would need agency approval. The draft RMPA fails to analyze an existing threat to GRSG in PPMA that would trigger the development a project wide Travel Plan to be completed in the next 5 years.

Lands and Realty Right of Way

(Suggest all readers review Table 2-6, pgs. 2-90 -2-93 RMPA to see detailed changes outlined in all alternatives (Most important Alt. D. Changes proposed in this program are too numerous to list in this outline and have the potential to impact in some way the entire local population. We have some brief highlights of Alt. D (Preferred Alt.) here with the hope the reader will review this section of the document.)

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative
Table2-6, D-LR1: pg. 2-90, All PPMA would be designated as avoidance areas for new ROW authorizations. Development should only occur in non-habitat areas. Require mitigation for impacts on sage-grouse habitat with no net loss, net benefit standard in PPMA. Disturbance may cause temporary habitat loss that would be mitigated over time to achieve no net loss. Development could occur in avoidance areas if that disturbance was within or under the 3% allowable as measured at the appropriate scale, then evaluate and implement effective mitigation to offset the resulting loss of GRSG habitat. Applicant must apply restoration mitigation to a nearby area prior to causing new disturbance to ensure the 3% threshold is not exceeded. New disturbance would not be allowed in PPMAs if the new disturbance would cause the 3% threshold to be exceeded. ROW may be allowed if they do not create new disturbance, even if the 3% threshold is currently exceeded. Allow private land owners a reasonable degree of access to their private land. If feasible land owner would be required to take an alternate route not through PPMA. If alternate route is infeasible mitigation would be considered to keep under 3% or at level when application was received. D-LR 2: pg. 2-91, Evaluate power lines by district and identify which power lines would provide the most benefit to the species by being buried, modified, or relocated. At renewal or amendment discuss with ROW holder the technical and financial feasibility of burying or relocating existing power lines. If it is technically or financially feasible to bury or relocate the existing power lines require the ROW holder to do so. (Reviewer suggestion for readers at least recommend to BLM change technically or financially feasible to technically and financially feasible in the last statement).	Current RMPs have avoidance areas on a much smaller scale Approx. an additional 4,546,897 acres would be in avoidance zone within the decision area under ALT D. This requires higher levels of NEPA and would require Mitigation with no net loss and a net benefit to GRSG habitat. Also current guidance under WO IM-2012-043 and Renewable Energy ROW policy guidance (WO-IM-2011-061)	Current RMPs have avoidance areas on a much smaller scale: approximately an additional 4,546,897 acres would be in avoidance zone within the decision area under Alt. D. This alternative also requires higher levels of NEPA (EIS) and would require mitigation with no net loss and a net benefit to GRSG habitat. Also there is current guidance under W.O. IM-2012-043 and Renewable Energy ROW policy guidance (WO-IM-2011-061). Recommended Alternative; Avoidance Zones would be as described in the current RMPs. Overarching objective is no net loss of GRSG habitat on public lands in PPMA. Mitigation of disturbance would be on site of equal acres if possible or offsite if not possible in the project area. Disturbance may cause temporary loss that would be mitigated over time. D-LR2, Table 2-6 would be implemented with the wording change to, “if it is technically and financially feasible.”

Predation

(This subject is addressed in the document in a very limited manner. BLM manages habitat and not the animals directly. Vegetation management and treatment does address predation concerns in the document. Predator control discussion was eliminated from analysis in the document. (See page ES-9 RMP vol. 1 for explanation.)

Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative	Explanation
RMPA Vol.1 pg. ES 9 explains predator control is outside the scope of document;Activities to improve nesting cover and eliminate predator perches through various regulatory mechanisms and vegetation treatment for habitat. (i.e. juniper encroachment).	Currently BLM manages habitat for ecological health. Vegetation treatments and management does consider habitat needs of wild life species and special status species. BLM wildlife biologists do coordinate with ODFW and APHIS on predator control and do make active recommendations and provide stipulations for predator control on public lands.	Due to the lack of research on predation, a pilot predator research program with ODFW on public lands should be included as a conservation measure in the draft RMPA. This alternative would also encompass what was omitted in Alt. E - the conservation guidelines from the ODFW State Plan would become conservation measures in the RMPA: 1) Evaluate feasibility of short-term predator management programs. 2) Consider predator management program only when identified as a limiting factor and other management tools have not stabilized declining population. a) Predator management includes both lethal and non-lethal methods. Examples of non-lethal methods are: using perch deterrents on power poles or fence posts, modifications to power poles or other human-made structures that are used by corvids or raptors for nesting BLM would enter into an MOU or similar agreement with ODFW to determine how and who will address predation threats on public land in this RMPA.	Predation is only marginally addressed in this document with the stated explanation that BLM manages the GRSG habitat, not the animal -which is an ODFW responsibility. An effective approach to reducing threats to GRSG would be acooperative effort. The BLM has conducted studies on the GRSG and provided public monies to perform telemetry studies to track seasonal movement of birds and document predation losses and nesting success etc. BLM wildlife biologists and field staff could make recommendations on predator control to ODFW (see agency active approach to controlling mosquitos for West Nile virus which is under APHIS on public lands).

Other Topics

(Provided below is a less detailed review of the additional topics)

Topic	Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative
Vegetation - Habitat Restoration	Goal: Manage PPMA and PGMA to establish a mix of sagebrush classes, depending on sagebrush type (Table 2-2, pg. 2-18). Treat approx. 30% of GRSG habitat over 10 years to reduce fire risk, limit juniper encroachment, and control invasive species. Prioritize the use of native plant materials for restoration. When availability or probability of success is low, nonnative materials may be used. When natives are available, nonnatives cannot be used if nonnatives were not already present, in areas not threatened by invasive plants, or to enhance forage. Seed mixes with >2 lb./ac crested wheat will not be considered native, even if the majority of the mix is native.	BLM RMPS do not have an overarching goal for vegetation restoration for GRSG. There are multiple guidance documents to guide restoration, Including interim guidance for GRSG. IM-2012-043. No current plan or detail guidance for treating fire prone invasives.	This proposed level of treatment will not keep up with juniper expansion, invasive plant increase and needs for fuel treatment. Rural Community Alternative would project proposed levels of habitat treatments in PPMA & PGMA based on the wildfire and invasive/ Juniper encroachment assessments using state and transition models (see Harney County draft CCAA) for each district in the RMPA. This would provide what and where strategic treatments would be done to preserve and enhance the habitat. Projections of habitat stabilization and or enhancement would be projected by funding estimates. This would provide projections from analysis and various funding scenarios and planned strategic treatments. Currently the goal of 30% treatment over 10 years is unclear on derivation the breakdown of type of treatments (Invasive, fuels, juniper encroachment) with no strategic approach analyzed in the document. Therefore chapters 4 & 5 show little positive change of habitat in preferred condition 10 & 50 years out. (RMPA Vol.11, Tables 4-3, & 4-4, pg. 4-22).
Recreation	Evaluate new and existing SRPs, RUPs, and recreation SRMAs to reduce impacts to GRSG. Travel management plan to be completed within 5 years. Limited OHV where access in PPMA would be limited to existing roads and trails.	Current policy and guidelines. Covered under Interim Management Policies and procedures for GRSG IM-2012-043	In PPMA, only allow SRPs that are neutral or beneficial. Seasonally prohibit camping and motorized recreation within 4 miles of leks. No travel management plan would be completed within 5 years. Seasonal closure of off road use in PPMA (March1-June 30) for breeding & nesting protection and closure of some roads and trails .6 miles from major known leks during breeding season. This would not encompass authorized activities (i.e. emergency activities, BLM necessary vegetation management and required permittee livestock management).
Land Tenure	Same as Alt. B: retain public ownership of PPMA, unless land exchange would allow for additional or more contiguous federal ownership of PPMA.	Current policy and guidelines. Interim Management Policies and procedures for GRSG IM-2012-043	Same as Alt. D & B: retain public ownership of PPMA, unless land exchange would allow for additional or more contiguous federal ownership of PPMA.

Other Topics

(Provided below is a less detailed review of the additional topics)

Topic	Alternative D BLM Preferred Alternative	Alternative A Current Situation	Alternative G Rural Community Alternative
Minerals	Complex, but essentially PPMA is open to fluid mineral leasing with no surface occupancy and PGMA open to fluid mineral leasing with CSU stipulations. PPMA and PGMA open for locatable minerals.	Current policy and guidelines. Interim Management Policies and Procedures for GRSG IM-2012-043.	No Review
ACECs	Management plans for 17 existing ACECs and 42 existing RNAs will be revised to incorporate GRSG considerations. Of these, 22 RNAs are identified as priority RNAs for long term monitoring. All grazing would be removed within these 22 RNAs within 5 years.	Existing ACECs managed under existing policy and plans.	Management plans for 17 existing ACECS and 42 existing RNAs would be reviewed as part of Rangeland Health Assessments for the allotment(s) where they are located during the permit renewal process to ensure any existing threats to sage grouse are addressed. Livestock AUMs in the decision area would be determined on the following basis: Close all Research Natural Areas (RNAs) which have over 20% PPMA and/ or 50% PGMA that are not meeting Rangeland Health Standards and livestock is a causal factor (as determined by a Rangeland Health Assessment conducted within the last five years). All RNAs which meet the criteria above would have appropriate indicators from Habitat Assessment Framework (HAF) incorporated into the Rangeland Health Assessment. Due to variability of some of the indicators in the HAF methodology (e.g., forb cover, stubble height), their application should be within the context of interannual trend (i.e., change over time) and site capacity as determined by ESDs. BLM would provide any additional fencing required to secure RNA boundary if needed to remove grazing, or would develop a voluntary cooperative agreement with affected permittee(s) to share costs and labor. These will serve as a baseline for understanding the impacts of grazing verses not grazing sage grouse habitat. RNAs would remain closed until documented as meeting Rangeland Health Standards. These determinations would be required as part of the grazing permit renewal process for the affected allotment.