Attachment 3
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Locatable Mineral Withdrawals (Management Action 79)

The BLM has identified 252,070 acres for locatable mineral withdrawal and another 894,060 acres to be considered for withdrawal because of risk to Greater sage-grouse and its habitat from conflicting locatable mineral location and entry. Wyoming regulates locatable mineral operations at both the exploration and extraction phases regardless of surface or mineral ownership (see Attachment 11 Wyoming Attorney General Memorandum). Much of the state's regulation of locatable minerals is done pursuant to the Wyoming Environmental Quality Act and is administered through the Land Quality Division (LQD) and Water Quality Division (WQD) of the Wyoming Department of Environmental Quality. Regulated locatable mineral exploration and development actions include exploration by dozing, exploration by drilling, mining operations, small mining operations, limited mining operations, and storm water discharges.

Additionally, by rule, mining operations must consult with the Wyoming Game and Fish Department (WGFD) and the United States Fish and Wildlife Service and address any concerns raised by these agencies as part of the permit application process (LQD Non-coal Rules and Regulations, Ch. 2, § 1(f)). The WGFD will analyze projects utilizing the Density Disturbance Calculation Tool (DDCT) and make stipulations and recommendations or deny the project consistent with the EO. A state agency with regulatory jurisdiction must require compliance with the EO.

Where locatable mineral activities occur on federal lands, the LQD works with BLM as part of the state application process. The BLM has, in addition, its own requirements for approval. The BLM's Surface Management Regulations, 43 CFR § 3809, prevent unnecessary or undue degradation of the public lands by operations authorized under the mining laws. For a more detailed discussion of the BLM's Surface Management Regulations from the American Exploration and Mining Association, see Attachment 12.

Collectively, these regulatory controls provide adequate protection of the Greater sage-grouse from the site-specific impacts of locatable mineral exploration and development. Wide-scale withdrawal of locatable mineral entry in these areas has little or no benefit to the species. The proposed action would, additionally, be contrary to EO 2015-4, which does not preclude locatable mineral activities, but instead applies, specific stipulations to mining activities.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Other Comments

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
2.6.3 BLM Proposed LUP Amendments	2-12	Management Objective #2: "*Enhance quality/suitable habitat to support the expansion of sage-grouse populations on federally administered lands within the planning areas.*"	Although this is one facet that needs to be included, a more comprehensive Management Objective is to "Maintain and enhance quality/suitable habitat." It is just as important to maintain important habitats as it is to enhance habitats. Insert "maintain."
Tables 2.2 and 2.3	2-15 through 2-22	Footnote 1 for each of these tables provides: "*Seasonal dates can be adjusted by local unit according to geographic region.*" This is inconsistent with EO 2015-4.	Table 2.5 (p. 2-66), footnote 1 provides that "*Seasonal dates can be adjusted; that is, start and end dates may be shifted either earlier of later, but the amount of days cannot be shortened or lengthened by the local unit.*" This language should be adopted in Tables 2.2 and 2.3 and similar tables in Bighorn Basin and Buffalo RMP Revisions.
Table 2-2	2-18	Existing language: "*Adjacent protective sagebrush cover within 328 feet (approx. 100m) of an occupied lek*"	Incorrect/inconsistent approximation. Recommend changing 328 ft to 330 ft.
Table 2-2	2-19	Existing language: "*Sagebrush height – Arid sites:4-31 inches (20.3-80cm); Mesic sites:12-31 inches (40-80cm)*"	Conversions from inches to cm are incorrect. Correction: 4"=10cm; 12"=30cm.
Table 2-2	2-20	Existing language: "*Adequate nesting cover of >6" or as determined by ESD site potential and local variability*"	Change ">6"" to ≥6"
MA2	2-22	Existing language: "*Field offices and ranger districts will work with project proponents, partners, and stakeholders to avoid or minimize impacts and/or*	At the end of MA2, insert the following language: "within Core Population Areas when standards are exceeded." Further, remove the language "and ranger districts[.]"

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		implement direct mitigation (e.g., relocating disturbance, timing restrictions, etc.), and utilize best management practices (BMP) and offsite compensatory mitigation where appropriate." This can be applied to be inconsistent with EO 2015-4. Wyoming's strategy is mitigation. If a project conforms to the management prescriptions contained in EO 2015-4, no additional mitigation is required.	
MA5	2-22	Existing language: *"The BLM will coordinate new recommendations, mitigation, and conservation measures applied for sage-grouse with the WGFD and other appropriate agencies, local government cooperators, and the Wyoming SGIT. These measures will be analyzed in site-specific NEPA documents, as necessary."* "Conservation measures" is a term specific to CCAA language and I do not recommend its use here.	Replace with: "The BLM will coordinate new recommendations, mitigation, and sage-grouse habitat objectives and management considerations with the WGFD and other appropriate agencies, local government cooperators, and the Wyoming SGIT. These measures will be analyzed in site-specific NEPA documents, as necessary."
MA6	2-23	*"in a priority area"*	Change to "within PHMAs" to achieve consistent use of language.
MA8	2-23	Existing language: *"Each BLM field office will develop landscape-scale restoration, conservation, and maintenance strategies, including*	I request that MA # 8 be modified as follows: "These strategies and habitat designations must be coordinated and reconciled with Wyoming's Greater Sage-grouse Core Area Protection (EO

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		special management of seasonal habitats and identified connectivity zones outside of PHMAs, working with voluntary partners and cooperating agencies. These strategies must be coordinated and reconciled, where possible, with adjoining management entities that share habitats or populations. Each BLM field office will develop landscape-scale restoration, conservation, and maintenance strategies, including special management of seasonal habitats and identified connectivity zones outside of PHMAs, working with voluntary partners and cooperating agencies. These strategies must be coordinated and reconciled, where possible, with adjoining management entities that share habitats or populations." The BLM should reconcile its strategies with EO 2015-4.	2015-4) strategy and, where possible, with adjoining management entities that share habitats or populations."
MA9	2-23	Existing language: *"Design all range projects in a manner that minimizes potential for invasive species establishment. Monitor and treat invasive species associated with existing range improvements."* Invasive species management must be considered in <u>all</u>	Remove language specific to range improvement projects. Recommended language: "Design all projects in a manner that minimizes potential for invasive species establishment. Monitor and treat invasive species associated with existing improvements."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		projects, not just range improvement projects.	
MA10	2-23	Existing language: "*Apply all appropriate required design features (Appendix B) as mandatory Stipulations/Conditions of Approval (COA) within PHMAs for fluid minerals, travel management, lands and realty, range management, wild horses, coal exploration, locatable mineral location and entry, West Nile Virus, mineral materials, non-energy solid leasable minerals, vegetation management, fire and fuels management, and noise.*" Stipulations and Conditions of Approval are specific to minerals management and may not apply to all of the listed programs. Additionally, I am concerned with the required design features in Appendix B (see comments specific to this issue below).	Delete the list of programs and reword to: "Apply appropriate required design features (Appendix B) as mandatory Stipulations/Conditions of Approval (COA)/Terms and Conditions within PHMAs for all program areas as applicable and consistent with EO 2015-4."
MA11	2-23	Existing language: "*Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species per BLM Handbook H-1740-2. Manage weed treatments to maintain and improve Greater Sage-Grouse*	Replace with: "Integrated vegetation management would be used to control, suppress, and eradicate, where possible, noxious and invasive species per BLM Handbook H-1740-2. Manage noxious or invasive species treatments to maintain or improve Greater Sage-grouse habitat. Apply Required Design Features as Conditions of Approval, such

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		habitat. Apply Required Design Features and BMPs as Conditions of Approval, such as those in Appendix B." BMPs should be determined as necessary at the project specific level.	as those in Appendix B. BMPs will be applied as determined through the site specific analysis."
MA21	2-24	Existing language: *"Field office staff will work with project proponents (including those within the BLM) and the WGFD to site their projects in locations that meet the purpose and need for their project, utilize the DDCT, and have been determined to contain the least sensitive habitats."* MA21 should be applied within PHMAs only.	I request the following be inserted at the beginning of the sentence: "In PHMAs, field office staff …"
MA29a	2-25	Existing language: *"In order to avoid surface-disturbing activities in PHMAs, priority will be given to development of oil and gas and other mineral resources outside of PHMAs, subject to applicable stipulations. When authorizing development of oil and gas and other mineral resources in PHMAs, subject to applicable stipulations for the conservation of Greater Sage-Grouse, priority will be given to development in non-habitat areas first and then in the least suitable habitat for Greater Sage-Grouse."* The BLM establishes a priority for "development of oil and gas	This priority has been represented to the State as an objective and not as a management action. MA # 29a should be deleted.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		and other mineral resources outside of PHMAs."	
MA32	2-26 through 2-27	Existing language: "*Within PHMAs, specific to management for Greater Sage-Grouse, all RMPs are amended as follows:* *New Transmission Lines (greater than 115 kV):* *New transmission lines greater than 115 kV in PHMA (core only) would be allowed only (1) within the 2-mile wide transmission line route through PHMA (core only) population areas in south-central and southwestern Wyoming (see Map 2-15 from Executive Order (EO) 2011-5; (2) when located within 0.5 miles or less of an existing 115 kV or greater transmission line or; or (3) in designated RMP corridors authorized for aboveground transmission lines. Transmission lines routed using one or more of the three criteria listed above will not be counted against the DDCT 5% disturbance cap..."* Request changes to achieve consistency with WY strategy.	Replace language with language from EO 2015-4 for consistency: "<u>New Transmission Lines (greater than 115 kV)</u>: New transmission lines greater than 115 kV in PHMA (core only) would be allowed only (1) within the 2-mile wide transmission line route through PHMA (core only) population areas in south-central and southwestern Wyoming (see attachment to Executive Order 2015-4; (2) when located within 0.5 miles or less of an existing pre 2008 115kV or greater transmission line or; or (3) in designated RMP corridors authorized for aboveground transmission lines. Transmission lines routed using one or more of the three criteria listed above will not be counted against the DDCT 5% disturbance cap. New transmission lines greater than 115 kV proposed outside of these areas would be considered where it can be demonstrated that declines in sage-grouse populations could be avoided through project design and/or mitigation. These projects will be subject to the density and disturbance restrictions for PHMA. Construction of new transmission lines will adhere to the restrictions associated with conducting activities within PHMA. Review of transmission line proposals would incorporate the Framework for Sage-Grouse Impacts Analysis for Interstate

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			Transmission Lines and other appropriate documents consistent with the three routing criteria described above. New projects within PHMAs that may require future utility lines, including distribution and transmission lines or pipelines, would include the proposed utility lines in their DDCT as part of the proposed disturbance. Lines permitted but not located in the above mentioned routes or a designated corridor will be counted towards the 5% disturbance calculation (line disturbance is equal to the anticipated construction footprint or construction ROW width multiplied by length and includes all access roads, staging areas, and other surface disturbance associated with construction outside of the construction ROW).
MA32	2-26 through 2-27	Request changes to achieve consistency with WY strategy.	New Electric Distribution Lines (less than 115 kV): New electric distribution lines would be buried where feasible and economically feasible. If not economically feasible, distribution lines may be authorized when effectively designed/mitigated to protect Greater sage-grouse and the Authorized Officer determines that overhead installation is the action alternative with the fewest adverse impacts while still meeting the project need. Agricultural and residential lines will be considered to be adequately mitigated for Greater sage-grouse if constructed at least 0.6 mile from the lek perimeter with appropriate timing

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			constraints and constructed to the latest APLIC standards. These ROW authorizations will be subject to approval by the State Director.
MA32	2-26 through 2-27	Request changes to achieve consistency with WY strategy.	Priority Transmission Lines: PHMAs are designated as avoidance areas for high voltage transmission line and pipeline ROWs, except for the transmission projects specifically identified below. All authorizations in these areas, other than the excepted projects, must comply with the conservation measures outlined in this proposed plan, including the Required Design Features (RDF) and avoidance criteria presented in Appendix B of this document. The BLM is currently processing an application for Gateway South, Gateway West, and TransWest Express and the NEPA review for these projects is well underway. The BLM is analyzing Greater sage-grouse mitigation measures through the project's NEPA review process.
MA32	2-26 through 2-27	Request changes to achieve consistency with WY strategy.	Pipelines: New pipelines through PHMAs would be allowed: (1) within an RMP corridor currently authorized for that use or designated through future RMP amendments; or (2) constructed in or adjacent to existing utilities (buried and above-ground) or roads. Pipelines constructed in RMP corridors or adjacent to existing utilities or roads will require completion of a DDCT analysis for baseline data collection but the project is not required to meet the threshold of 5%. However,

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			within 6 months of the completion of construction, the project proponent will provide the AO with as-built drawings so that total disturbance within core area can be calculated annually."
MA36	2-29	Existing language: "*Within PHMAs, all RMPs are amended as follows: Wind energy development would be avoided in PHMAs (Map 2-33), and not allowed unless it can be sufficiently demonstrated that the development activity would not result in declines of PHMA populations. Sufficient demonstration of "no declines" should be coordinated with the WGFD and USFWS.*"	**This language should be in all plans including in the Buffalo and Bighorn Basin RMP Revisions and in the attachments associated with those plans.**
MA48	2-32	Existing language: "*Within PHMAs, all BLM use authorizations will contain terms and conditions regarding the actions needed to meet or progress toward meeting the habitat objectives. If monitoring data show the habitat objectives have not been met nor progress being made towards meeting them, there will be an evaluation and a determination made as to the cause. If it is determined that the authorized use is a cause, the use will be adjusted by the response specified in the instrument that authorized the use.*	I recommend changing this language to accurately reflect EO 2015-4 and its Attachment C.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		The NEPA analysis for renewals and modifications of livestock grazing permits/leases that includes lands within SFAs and PHMAs will include specific management thresholds based on Greater Sage-Grouse habitat objectives (Tables 2-2 and 2-3), Land Health Standards (43 CFR 4180.2)." This action is inconsistent with EO 2015-4, Attachment C.	
MA61	2-38	Existing language: "A minimum lease size of 640 contiguous acres of federal mineral estate would be applied within PHMAs. Preliminary parcels reviewed for possible offering in a lease sale should comply with this minimum lease size. Expressions of interest that are less than this minimum lease size would be evaluated and modified by the BLM to meet the minimum lease size, where possible, prior to review for possible offering in a lease sale."	These portions of MA # 61 are unnecessary in light of Management Actions # 126 (p. E-2 through E-3) and 127 (p. E-5 through E-6) and should be deleted.
MA62	2-39	"Within PHMAs, specific to management for Greater Sage-Grouse , all RMPs are amended as follows: Geophysical exploration projects that are designed to minimize habitat fragmentation within PHMAs would be	Add MA 126 and 127 to stipulations listed within parenthesis.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		allowed, except where prohibited or restricted by existing LUP decisions, and in conformance with timing and distances stipulations (see actions 129 through 134)."	
MA67	2-42	The BLM indicates that it will "[r]equire unitization when deemed necessary for proper development of an area…" Use of unitization in this manner misinterprets the legal purpose of unitization as established by law and BLM guidance. Unitization provides for the exploration and development of an entire geologic structure or area by a single operator so that drilling and production may proceed in the most efficient and economic manner, not for the protection of resources. Further, 43 CFR § 3186.1 9. DRILLING AND DISCOVERY. provides: "Within 6 months after the effective date hereof, the Unit Operator shall commence to drill and adequate test well at a location approved by the AO..." and "wells shall be drilled with not more than 6-months time elapsing between the completion of the first well and commencement of drilling operations for the second well..."	MA # 67 should be deleted. This MA has the potential to require development contrary to the conservation goals outlined in EO 2015-4.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
MA75	2-43	Existing language: *"PHMA is essential habitat for maintaining Greater Sage-Grouse for purposes of the suitability criteria set forth at 43 CFR 3461.5(o)(1)."* The word "essential" is not necessary as PHMA is managed for Greater sage-grouse.	Remove "essential."
MA75	2-43	Existing language under the Casper RMP: *"All BLM administered lands within the CDPA...:"*	Add language: "within the area or those lands that fall within PHMA."
MA76	2-44	It is unclear what the term "surface facilities" includes for purposes of underground mining. EO 2015-4 recognizes ventilation shafts necessary for the safety and health of miners.	I request that the BLM adopt the following EO 2015-4 language for consistency purposes: "Surface disturbance and surface occupancy stipulations will be waived within the Core Area when implementing underground mining practices that are necessary to protect the health, welfare, and safety of miners, mine employees, contractors and the general public. The mining practices include but are not limited to bore holes or shafts necessary to: 1) provide adequate oxygen to an underground mine; 2) supply inert gases or other substances to prevent, treat, or suppress combustion or mine fires; 3) mine roof stabilizing substances; and 4) remove methane from mining areas. Any surface disturbance or surface occupancy necessary to access the sites to implement these mining practices will also be exempt from any stipulation."
MA78	2-45	*Solid Leasable Minerals (Other than*	Should include stipulations MA 126 (density and

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		Coal and Oil Shale) - There are several stipulations related to density and disturbance, timing limit stipulations, core and non-core, etc. that should also apply to mining.	disturbance), 129-134 and Noise MA 136 as stipulations under Solid Leasable Minerals.
MA79	2-46	See Attachment 3 narrative and Attachment 11 for detailed comments.	I request the language reflect that lands in Wyoming remain open to locatable mineral location and entry and are subject to state and federal regulation.
MA88	2-48	Attachment B to EO 2015-4 provides): "Locate new collector or arterial roads that will have relatively high levels of activity (accessing multiple wells, housing development) greater than 1.9 miles from the perimeter of occupied Greater sage-grouse leks (Lyons and Anderson 2003). Locate new local roads used to provide facility site access and maintenance greater than 0.6 miles from the perimeter of occupied Greater sage-grouse leks. Construct roads to minimum design standards needed for production activities." In EO 2015-4, collector or arterial roads are defined as: "single-lane or double-lane roads, with travel ways 12 to 24 feet in width. They collect traffic from local roads and connect to arterial roads or public highways. They are operated for	BLM "collector" or "local" roads, as defined in the BLM Gold Book, would correspond to the definition of "collector" or "arterial" roads in EO 2015-4. Correspondingly, BLM "resource" roads, as defined in the BLM Gold Book, would correspond to the definition of "local" roads in EO 2015-4. Modify MA # 88 to conform with EO 2015-4.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		intermittent or constant service." Local roads are defined as: "single-lane roads with travel ways 12 to 14 feet in width. They connect terminal facilities, such as well sites, to collector, local, arterial, or other higher-class roads. They are operated for low-volume traffic."	
MA93	2-49	Existing language: *"Within PHMAs and GHMAs, the BLM would manage for vegetation composition and structure that reflects ESD or other methods that reference site potential or comparable standard to achieve sage-grouse and other resource objectives."*	I recommend using a combination of existing language and the Buffalo RMP Revision language for clarity and consistency. "Manage vegetation composition, diversity and structure, as determined by Ecological Site Description (ESD), or other methods that reference site potential, and WGFD protocols, to achieve Greater sage-grouse habitat management objectives, in cooperation with stakeholders."
MA95 and MA96	2-50	Vegetative treatments must follow the Wyoming Game and Fish protocols.	Ensure that each management action references WY Game and Fish Department protocols. Add seasonal habitat language to Bighorn Basin and Buffalo RMP revisions: "Seasonal restriction would be applied, as needed, for implementing fuels management treatments according to the type of seasonal habitat present."
MA104		*"The role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to PHMAs would be evaluated to determine if they should be restored to sagebrush or habitat of higher*	Revise this portion of the action and use the language from the Buffalo RMP Revision in all plans: "Evaluate the role of existing seedings that are currently composed of primarily introduced perennial grasses in and adjacent to sage-grouse habitat to determine if they should be restored to

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		quality for sage-grouse. If these seedings are part of an AMP or if they provide value in conserving or enhancing the rest of the PHMAs (core only), no restoration would be necessary."	sagebrush or habitat of higher quality for sage-grouse. If these seedings provide value in conserving or enhancing sage-grouse habitats, then no restoration would be necessary. Assess the compatibility of these seedings for sage-grouse habitat during the land health assessments."
MA109	2-53	Existing language: "*Within PHMAs, specific to management for Greater Sage-Grouse, all RMPs are amended as follows: Within PHMAs, the BLM would review and consider amending BLM Herd Management Area Plans (HMAPs) to incorporate sage-grouse habitat objectives and management considerations for all BLM Herd Management Areas (HMA).*" The wild horse program and management of wild horses must be held to the same standards as other programs. Management proposed under the RMP fails to adequately address the potential impacts wild horses have on Greater sage-grouse habitat.	Change MA 109 to: "Manage herd management areas (HMAs) in GRSG habitat within established AML range to achieve and maintain GRSG habitat." **Also add to Bighorn Basin RMP Revision.**
MA115	2-54	Existing language: "*Burned areas that are within PHMAs would be restored.*" MA needs clarification.	Replace with: "Burned areas within PHMAs would be managed to restore suitable habitat with consideration given to ESDs, reference sites, site potential and local variability."
MA126	2-59	Existing language: "*In PHMAs (core only), the density of disturbance of an*	To achieve consistency, replace the word "facility" with "activity."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		energy or mining facility (Appendix D) would be limited to an average of one site per square mile (640 acres) within the DDCT, subject to valid existing rights. The one location and cumulative value of existing disturbances will not exceed 5 percent of suitable habitat of the DDCT area. Utilize the Greater Sage-Grouse density disturbance calculation tool as described in Appendix D." The use of the word "facility" allows more surface disturbance to occur and is inconsistent with WY EO 2015-4.	
MA126	2-59	Existing language: *"The one location and cumulative value of existing disturbances will not exceed 5 percent of suitable habitat of the DDCT area."*	Recommended language: "The one location and cumulative value of existing disturbances (from any one program) will not exceed 5 percent of suitable habitat of the DDCT area."
MA128	2-59 (see also 2.7.3 Regional Mitigation , pp. 2-80 through 2-82)	For PHMAs the MA establishes that "*the BLM will require and ensure mitigation that provides a net conservation gain to the species...*" Wyoming's strategy is mitigation. If a project conforms to the management prescriptions contained in Executive Order 2015-4 no additional mitigation is required.	To rectify this inconsistency, the BLM should add the following language: "...in PHMAs that exceed the threshold of 5% disturbance and an average of 1 activity per 640 acres, the BLM will require and ensure mitigation that provides a net conservation gain to the species..."
MA134	2-61	Existing language: "*Surface disturbing and/or disruptive activities in mapped*	To ensure consistency with EO 2015-4, modify MA # 134 to use the language in the EO.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		sage-grouse winter concentration areas, to be mapped by the WGFD, would be prohibited from December 1-March 14 to protect PHMA (core only) populations of sage-grouse that use these winter concentration habitats. This timing limitation would be applied to all winter concentration areas within PHMAs. Activities in unsuitable habitats within PHMAs would be evaluated under the exception, waiver, and modification criteria and could be allowed on a case-by-case basis. Protection of additional mapped winter concentration areas in GHMAs would be implemented where winter concentration areas are identified as supporting populations of sage-grouse that attend leks within PHMAs (core only). Appropriate seasonal timing restrictions and habitat protection measures would be considered and evaluated in all identified winter concentration areas." MA # 134 is inconsistent with EO 2015-4.	
MA136	2-61 and 2-62	MA # 136 is inconsistent with Attachment B to EO 2015-4.	I request this language be changed to achieve consistency with EO 2015-4- "New project noise levels, either individual or cumulative, should not exceed 10 decibels (as measured by L_{50}) above

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			baseline noise at the perimeter of the lek from 6:00 pm to 8:00 am during the breeding season (March 1-May 15). Specific noise protocols for measurement and implementation will be developed as additional research and information emerges."
MA138	2-63	Existing language: *"Designate SFAs as shown on Map 2-36 (1,915,990 acres). SFAs will be managed as PHMA, with the following additional management: 1) Recommended for withdrawal from the General Mining Act of 1872, subject to valid existing rights, the lands shown in Map 2-23 (252,160 acres).2) Prioritized for management and conservation actions in these areas, including, but not limited to review of livestock grazing permits/leases (see livestock grazing section for additional actions)."* It is not necessary to discuss specific programs through this management action. Specific management related to specific programs is detailed in management actions throughout chapter 2.	Reword to say: "Designate SFAs as shown on Map 2-36 (1,915,990 acres) prioritized for management and conservation actions."
2.7.3 Regional Mitigation	2-81 (see also D-15 through D-18	The document notes that "[t]he BLM and Forest Service will establish a WAFWA Management Zone Greater Sage-Grouse Conservation Team…to	The Sage-Grouse Implementation Team serves as the oversight team in implementing Wyoming's strategy and the Wyoming State Legislature established the Team as a statutory body (§ W.S.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
	Mitigation)	help guide the conservation of Greater Sage-Grouse, within 90 days of the issuance of the Record of Decision" and that "[t]he Team will develop a [WAFWA Management Zone] Regional Mitigation Strategy..."	9-19-101) to provide recommendations regarding regulatory actions necessary to maintain and enhance Greater sage-grouse populations in Wyoming. Both the BLM and FS serve on that team. Establishment of a new team is unnecessary and inconsistent with Wyoming's strategy. Further, any regional mitigation strategy should be developed in consultation with the Sage-Grouse Implementation Team. Reword to reflect this strategy: "The BLM and Forest Service will participate in mitigation strategies prescribed by the states within each WAFWA Greater Sage-grouse Management Zone. State wildlife agencies and other agencies will coordinate mitigation efforts across jurisdictional boundaries to assure the integrity of conservation efforts in the region, and to assure mitigation results in effective conservation of the species and its habitats."
Appendix B, B.1 Introduction	B-1	It needs to be clear that RDFs only apply to Core Population Areas identified in EO 2015-4.	Modify sentence one of paragraph two as follows: "RDFs are required for certain activities in Greater sage-grouse PHMA ~~habitat~~."
Appendix B, B.1 Introduction	B-1		Modify sentence two of paragraph two as follows: "However, the applicability and overall effectiveness of each RDF cannot be fully assessed until the project scope ~~level~~ such as ~~when~~ the project location and design are known."
Appendix B, B.1 Introduction	B-1		Modify the first bullet as follows: "A specific RDF is documented to not be applicable to the site-specific conditions of the project/activity

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			(e.g., due to site limitations, ~~or~~ engineering considerations, or economic factors). ~~Economic considerations, such as increased costs, do not necessarily require that an RDF be varied or rendered inapplicable.~~"
Appendix B, B.2	B-2, Paragraph 3	These requirements need to be subject to the preferences of landowners. On split estate lands where the surface is owned by private landowners, BLM must defer decisions with regard to such things as what remains on the land (e.g., size of ponds) to those private landowners.	Replace the current RDF with the following: "Where existing leases or right-of-ways (ROWs) have had some level of development (road, fence, well, etc.) and are no longer in use, reclaim the site by removing these features and restoring the habitat subject to landowner preferences."
Appendix B, B.2.1, Roads	B-2, Paragraph 1		This requirement is vague and ambiguous. Clarification needs to be added as to what is meant by "important areas" and "habitats" and it must be predicated upon the preferences of landowners.
Appendix B, B.2.1, Roads	B-2, Paragraph 2	Not all users may be able to coordinate activities on roads. Some authorization holders may pre-date others and activities may not coincide among users.	Replace the current RDF with the following: "Coordinate road construction and use among right-of-way or special use authorization holders consistent with rights granted."
Appendix B, B.2.1, Roads	B-3, Paragraph 1	Any crossings of ephemeral drainages or streams will likely be subject to Section 404 of the Clean Water Act.	Replace the current RDF with the following: "Construct road crossings at right angles to ephemeral drainages and stream crossings subject to any applicable requirements of Section 404 of the Clean Water Act."
Appendix B, B.2.1, Roads	B-3, Paragraph	EO 2015-4 exempts production and maintenance activities from seasonal	Delete this RDF.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
	3	use stipulations. The BLM must recognize that remotely monitoring a site may not always identify all operational considerations. In order to conduct safe and effective oil and gas operations, certain on-site inspection and maintenance activities must be conducted regularly. It is recognized that limitations placed on access to well locations during critical seasons may be necessary, such as prohibiting construction activities (e.g., well pads, roads, pits) or limiting the number of trips allowed. However, basic maintenance and operation activities are crucial to maintaining safe, effective, and environmentally sound operations. Further, some operations cannot economically absorb the costs of telemetry.	
Appendix B, B.2.1, Roads	B-3, Paragraph 4	The special use authorizations are typically written to the user of the roads which would be the energy companies. The county may take authority for the road later, but not typically at issuance. Requiring that the all other terms and conditions be included is too broad.	Replace the RDF with the following: "Ensure rights-of-way or special use authorizations on newly constructed energy development roads are issued using only appropriate terms and conditions consistent with the intended use of the road."
Appendix B, B.2.2, Operations	B-3, Paragraph	It may be acceptable for pipelines to be placed under or immediately adjacent to	This RDF should be modified as follows: "Place new utility developments (e.g., power lines and

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
	4	the road, provided enough room exists topographically to make it feasible. If a pipeline adjacent to a road results in significant cut and fill, it may be more appropriate to consider a different approach.	pipelines) and transportation routes in existing utility or transportation corridors taking into account any surface use constraints such as steep terrain, soil conditions and safety which would make this approach inappropriate."
Appendix B, B.2.2, Operations	B-3, Paragraph 5	Not only is this requirement not feasible in all cases, it is also excessive and cost-prohibitive. I urge BLM to add flexibility that takes into account technical feasibility and economic considerations.	Add the following statement to this RDF: "This requirement must be subject to operational considerations and economic viability."
Appendix B, B.2.2, Operations	B-3, Last Paragraph	Following, *"Cluster disturbances, operations ..."* the remainder of this requirement will not be possible with multiple leaseholders in an area. Due to such things as ownership, royalties, operational differences and safety considerations, this is not feasible in many cases. This could be the case with even a single operator. The second sentence in this requirement is new and should be removed because the density/disturbance thresholds in PHMAs accomplish this goal.	Replace this RDF as follows: "Taking into account ownership, royalty accounting, operational and safety, consideration may be given to clustering disturbances, operations (e.g., fracture stimulation and liquids gathering), and facilities. ~~If the geology is exploratory and there is the potential that subsequent wells may not be drilled, do not disturb additional habitat until geology has proven additional wells can go on the pad and it is necessary to do so.~~"
Appendix B, B.2.2, Operations	B-4, Paragraph 2	There are several issues with this requirement. First, private landowners may not want additional infrastructure placed in already disturbed locations.	Modify the RDF as follows: "To the extent feasible, place infrastructure in already disturbed locations where the habitat has not been fully restored with consideration to landowner

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		Second, if reclamation is underway and restoration objectives are strict and must be met to allow continued development, this requirement will not work.	preferences and the overall reclamation objectives for the area where this requirement will be used."
Appendix B, B.2.2, Operations	B-4, Paragraph 3	The term "phased development" is vague and requires clarification because it is subject to a variety of interpretations. I oppose phased development which only allows certain portions of a leasehold unit or NEPA analysis area to be developed over time until that portion is plugged or abandoned before proceeding to another portion of the leasehold, unit or NEPA analysis area. This approach would constitute a clear violation of existing lease terms since this type of terminology departs from the existing language in the federal lease form. Recognition must also be given to the fact that multiple operators may often develop an area under a specific NEPA analysis, thereby necessitating BLM to consider impacts to valid existing rights under a phased development scenario. Until this terminology and its limits on application are specifically defined, this requirement needs to be removed.	Delete this RDF.
Appendix B, B.2.2,	B-4,	Placing liquid gathering facilities inside	Delete this RDF.

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
Operations	Paragraph 4	priority areas would reduce truck traffic, which would be more advantageous in priority areas. Further, if liquid gathering or trucking is not allowed inside priority areas, there is no way to remove liquid production from the lease. This requirement conflicts with standard operational practices and is not feasible and needs to be removed.	
Appendix B, B.2.2, Operations	B-4, Paragraph 6	See previous comment above.	Delete this RDF.
Appendix B, B.2.2, Operations	B-4, Paragraph 8	This requirement is unreasonable and lacks scientific justification. BLM has failed to identify any studies on GRSG which correlate movement and distances relative to GRSG response. Considering the existing NSO from leks, pump jacks at a distance of at least 0.6 mile, as provided in EO 2015-4, there is no conflict.	Delete this RDF.
Appendix B, B.2.2, Operations	B-4, Paragraph 9	It is not reasonable to require closed loop mud systems for all drilling. Many drilling rigs are not equipped for closed loop drilling (no reserve pit). Further, some type of pit will be needed for drilling cuttings if a closed system were available on a drilling rig. This requirement should be qualified to allow	Modify this RDF as follows: "Use only closed-loop systems for drilling operations, ~~with no reserve pits,~~ when feasible."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		this as an option, not a requirement.	
Appendix B, B.2.4, Noise	B-5, Paragraph 1	Adjust language regarding noise to achieve consistency with EO 2015-4.	I request this language be changed to achieve consistency with EO 2015-4 - "New project noise levels, either individual or cumulative, should not exceed 10 decibels (as measured by L50) above baseline noise at the perimeter of the lek from 6:00 pm to 8:00 am during the breeding season (March 1-May 15). Specific noise protocols for measurement and implementation will be developed as additional research and information emerges."
Appendix B, B.2.4, Noise	B-5, Paragraph 2	Inconsistent with EO	Delete this RDF.
Appendix B, B.2.4, Noise	B-5, Paragraph 3	It is important to understand that the farther the distance between production wells and compressor stations, the larger the amount of compression will be needed outside the priority habitat area which will actually create more noise. Also, there are many considerations when siting compressor stations, such as the engineering and design constraints inherent to gas gathering systems. With regard to directing compressor station noise away from priority habitat, proximity to other receptors, such as homes, also needs to be considered. This requirement must	Replace the current RDF with the following: "Project proponents will avoid locating new compressor stations within PHMAs. When it is necessary to place compressor stations in PHMAs, project proponents will design them to reduce noise to the extent practicable and work with BLM to thoughtfully locate them so noise is directed away from leks inside PHMAs."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		be revised to account for technical feasibility, as well as landowner preferences when private land is involved.	
Appendix B, General Greater Sage-Grouse Habitat, Best Management Practices	B-8		Add the following language to this statement: "BMPs are continuously improving as new science and technology become available and therefore are subject to change. At a minimum include the following BMPs, when appropriate and feasible:"
Appendix C, Non-Native/Noxious/Invasive Weeds	C-7	Downy brome is a landscape scale issue across Wyoming lands. It would be impossible in many places to "eliminate" this species. Consideration must be given to highly competitive invasive species on adjacent landscapes.	Remove the sentence that addresses elimination from this requirement.
Appendix C, Seed	C-16, Paragraph 1		I recommend the word "certified" be inserted before "weed free[.]"
Appendix C, Mulch	C-19, Paragraph 4	Gravel at a depth of two inches would be prohibitive to seedling growth and establishment as such it would not promote reclamation.	Delete this provision.
Appendix C, Mulch	C-19, Paragraph 6	There is no mechanism/authority set up to certify mulch from mold and/or fungi. There is only the possibility of certification that it will be weed free and even this does not exclude all weed seeds.	Modify this statement as follows: "Any mulch used must be certified weed free ~~from mold, fungi, or noxious or invasive weed seeds~~."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
Appendix E, Fluid Mineral Stipulations, Management Action # 126, Exception	E-2		In the Exception section, make the following modification: "An exception to the stated limits may be granted when onsite and/or offsite mitigation…"
Appendix E, Fluid Mineral Stipulations, Management Action # 127, Exception	E-5		In the Exception section, make the following modification: "An exception to the stated limits may be granted when onsite and/or offsite mitigation…"
Appendix E, Fluid Mineral Stipulations, Management Action #131	E-11	Attachment B to EO 2015-4 provides: "Where credible data support different timeframes for these seasonal restrictions, dates may be shifted 14 days prior to or subsequent to the above dates, but not both."	At the end of the second paragraph, insert: ", but not both."
Appendix E, Fluid Mineral Stipulations, Management Action #131, Stipulation Description	E-11	The Management Action Text identifies the appropriate seasonal stipulation; however the Stipulation applies a different date of March 1.	Modify Management Action #131 Stipulation as follows: "No surface use is allowed March 15 – June 30 inside designated core areas."
Appendix E, Fluid Mineral Stipulations, Management Action #132, Stipulation Description	E-13	See previous comment.	See previous comment.
Appendix E, Fluid Mineral Stipulations, Management Action #132	E-13	Attachment B to EO 2015-4 provides: "Where credible data support different timeframes for these seasonal restrictions, dates may be shifted 14 days prior to or subsequent to the above	At the end of the second paragraph, insert: ", but not both."

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
		dates, but not both."	
Appendix E, Fluid Mineral Stipulations, Management Action #133	E-15	EO 2015-4 provides (see Attachment B): "Where credible data support different timeframes for these seasonal restrictions, dates may be shifted 14 days prior to or subsequent to the above dates, but not both."	At the end of the second paragraph, insert: ", but not both."
Appendix E, Fluid Mineral Stipulations, Management Action #134	E-17		To provide clarity and consistency with EO 2015-4, modify MA # 134, Management Action Text as follows: "Sage-grouse winter concentration areas: Surface disturbing activities in mapped sage-grouse winter concentration areas as identified in EO 2015-4 would be prohibited from December 1–March 14 to protect PHMA (core only) populations of sage-grouse that use these winter concentration habitats. ~~This timing limitation would be applied to all winter concentration areas within PHMAs. Activities in unsuitable habitats within PHMAs would be evaluated under the exception, waiver, and modification criteria and could be allowed on a case-by-case basis. Protection of additional mapped winter concentration areas in GHMAs would be implemented where winter concentration areas are identified as supporting populations of sage-grouse that attend leks within PHMAs (core only). Appropriate seasonal timing restrictions and habitat protection measures would be considered and evaluated in all identified winter~~

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			~~concentration areas.~~"
Appendix E, Fluid Mineral Stipulations, Management Action #134	E-17		To provide clarity and consistency with EO 2015-4, modify MA # 134, Protected Resource text as follows: "Greater Sage-Grouse winter concentration areas ~~within designated core areas, and outside designated core areas when supporting wintering Greater Sage-Grouse that nest within designated core areas~~[.]"
Appendix E, Fluid Mineral Stipulations, Management Action #134	E-17		To provide clarity and consistency with EO 2015-4, modify MA # 134, Stipulation text as follows: "Greater Sage-Grouse winter concentration areas. This area encompasses Greater Sage-Grouse winter concentration areas identified in EO 2015-4. No surface use is allowed during December 1 – March 14 within Greater Sage-Grouse winter concentration areas ~~in designated core areas, and outside designated core areas when supporting wintering Greater Sage-Grouse that attend leks within designated core areas~~."
Glossary	GL-2	*"Ambient (noise level): Sometimes called background noise level, reference sound level, or room noise level is the background sound pressure level at a given location, normally specified as a reference level to study a new intrusive sound source."*	The terms "existing ambient," "ambient noise" and "natural ambient" are interchanged throughout the document and mean different things. Much confusion exists over the meaning of these common terms. For example, Alternative C – the alternative containing the least restrictive sage-grouse measures-- uses the term "natural ambient" which, ironically, is more protective than any of the other alternatives (see Page 2-157, Record # 4121). The other alternatives use the phrase

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			"ambient noise" which is understood by some to include background anthropogenic noise, while others believe it includes all "existing" noise, regardless of source or cause. Choose one term and define it. Do not use both.
Glossary	GL-7	"Conservation Measures"	Please add language to the definition of "Conservation Measures" that demonstrates measures that will be developed in collaboration with the State of Wyoming and other applicable stakeholders.
Glossary	GL-33	"Sage-grouse Disruptive Activity"	The definition of "Sage-grouse Disruptive Activity" should be removed from the document - disruptive activities are the same for Greater sage-grouse as they are for other wildlife species.
Glossary	GL-37	The BLM has defined "Surface Disturbance" in Information Bulletin (IB) WY-2007-029, Guidance for Use of Standardized Surface Use Definitions, and again in BLM IM WY-2012-019. Both documents direct the BLM to use the standardized definition provided in IB WY-2007-029.	The statement "...activity to be present in these habitats for a duration of more than 1 hour during any one 24 hour period during the application season in the site-specific area." is acceptable. This exception will provide clarification to short-term activities occurring within the site specific area.
Appendix L— Federal Laws, Regulations, Policies, and Guidance	New Sub-Section needed for Water Quantity	Need to delineate regulatory authority for beneficial water use and permitting. This could be addressed by including quantity in section L.4 (i.e.- L.4 Water Quantity and Quality)	Develop a comprehensive list that outlines federal laws and statutes, BLM/USFS regulations and policies, Wyoming state laws and regulations, Memorandums of Understanding and agreements applicable to the Land Use Plans, similar to Appendix B of the Bighorn Basin Proposed RMP. Include Wyoming State Engineer's Office

Attachment 3 Table
Bureau of Land Management – Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement

Wyoming Greater Sage-Grouse Proposed Land Use Plan Amendment and Final Environmental Impact Statement - BLM			
Management Action #	Page	Discussion (including inconsistency, if applicable)	Resolution
			Statutes, Rules and Regulations. Additionally, two MOUs should be included: 1) MOU Between the State of Wyoming State Engineer's Office and the USDI, Bureau of Land Management, Wyoming State Office, which specifies roles, responsibilities and procedures for water rights permitting and water use on or derived from BLM land in Wyoming and 2) MOU between the State of Wyoming State Engineer's Office and the USDA Forest Service Rocky Mountain Region 2 and Intermountain Region 4, which specifies roles, responsibilities and procedures for water rights and uses on Forest Service land in Wyoming.