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Proposed Priority-Core and Proposed Priority-Connectivity

The USFS proposes to manage additional management areas, identified as "Proposed Priority-Core" and "Proposed Priority-Connectivity," according to management prescriptions for Core Population Areas. Presumably this is done in order to comply with USFS "viability" requirements. With limited exception, these areas identified in Maps 2-8, 2-13, 2-18, 2-23, 2-28, and 2-33 are not consistent with Core Population Areas identified in EO 2015-4, which were developed through a public and science-based process. The USFS attempt to add significant areas to Priority Habitat Management Areas within the State of Wyoming are neither consistent with EO 2015-4 nor supported by science. They have the potential to cause widespread, adverse effects on land and natural resource management and these additions are not necessary to maintain and enhance Greater sage-grouse population and habitat in Wyoming.

The USFS M Creek Area in the Thunder Basin National Grassland, for example, is an area of slightly more than 26,000 acres. It contains only three known leks. According to USFS data, 37 birds were observed at two of the three leks in 2006. Recently the Sage Grouse Implementation Team reviewed this area and determined that it is not adjacent to other Core Area Populations, it lacks sufficient suitable habitat, is leased for oil and gas development and thus is not suitable for designation as priority habitat.

I request that the USFS remove these areas. They should be managed in accordance with EO 2015-4.

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FS GRSGH-DC-002 - Desired Condition	2-65	Existing Language: *"...70% of lands capable of producing sagebrush have 10-30% sagebrush canopy cover..."* EO 2015-4 defines suitable sage-grouse habitat as areas within the mapped occupied range of sage-grouse and "has 5% or greater sagebrush canopy cover as measured by the technique developed by interagency efforts." The lower end of the range described in the desired conditions should change to be consistent with EO 2015-4.	Change 10% to 5%.
FS Table 2-5	2-65	*Table 2-5. Seasonal Habitat Desired Conditions for Greater sage-grouse.* The USFS portion of the 9 Plan document does little to recognize ecological and local variability. While the table does contain some recognition of ecological variability and site potential, the opportunity to manage for that variability is hidden in footnotes.	All Desired Conditions listed in Table 2-5 need a disclaimer to recognize local variability. As an introduction to the table, insert: "Determinations on whether desired conditions are being met, or whether an area is moving towards meeting desired conditions, will be dependent upon ecological sites, site capability and local variation (e.g., weather patterns, localized drought, ESD state, etc.)."
FS Table 2-5	2-65	Existing desired condition for seasonal habitat extent (percent of seasonal habitat meeting desired conditions): *">80% of the breeding and nesting habitat."* This desired condition may have far-reaching negative impacts on resource uses. The document must be clear that the expectation cannot be met everywhere due to multiple variables.	Change to: "Greater than 80 percent of the nesting habitat meets the recommended vegetation characteristics, where appropriate (relative to ecological site potential, etc.)"
FS Table 2-5	2-65	Existing desired condition: *"Sagebrush canopy*	Change 15% to 5%.

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		cover - 15-25%." The low end of the range is inconsistent with WY EO 2015-4.	
FS Table 2-5	2-65	*"Perennial grass height: Provide overhead and lateral concealment from predators"*	Carry this requirement through to Table 2-6 and add the following: "Adequate nesting cover of ≥6" or as determined by ESD site potential and local variability."
FS Table 2-5	2-65	*"Areas managed for brood-rearing…sagebrush canopy cover:"*	Change 10 to 5 for consistency with WY EO 2015-4.
GRSGH-ST-003-Standard	2-66	*"Design habitat restoration projects to move towards the desired conditions in table 1 and incorporate the concepts outlined in Appendix C - Reclamation Plan and Appendix D - Monitoring Framework."*	Replace with "Design habitat restoration projects to move towards the desired conditions in table 1 and incorporate the concepts outlined in Appendix C - Reclamation Plan and Appendix D - Implementation Framework in cooperation with the State of Wyoming and its agencies, local governments, private landowners, local sage-grouse working groups, partners and stakeholders by developing site-specific conservation strategies to maintain or enhance sage-grouse habitats and habitat connectivity."
GRSG-GRSGH-ST-004-Standard	2-66	Existing language: "*When (1) annual lek counts, wing counts, aerial surveys, habitat monitoring or Density Disturbance Calculation Tool evaluations show deviation from normal annual fluctuations in Greater Sage-Grouse habitat or populations for two consecutive years that may indicate a long-term downward trend or (2) monitoring identifies other negative population or habitat anomalies for*	A more appropriate approach would be to require 3 out of 5 consecutive years of data (i.e., Y1-2-3, Y2-3-4, Y3-4-5).

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		Greater Sage-Grouse, conduct an evaluation to determine causal factors and develop an appropriate response strategy. This strategy may include curtailment of activities that may adversely affect Greater Sage-Grouse populations or habitat." An evaluation period of two consecutive years is not a sufficient time period to indicate a "long-term downward trend."	
GRSGH-ST-005 - Standard	2-67	Existing Standard: *"If two of the preceding indicators exceed 60% of normal variability in a year or one of the preceding three indicators exceeds 40% of normal variability for 3 out of any 5 years, desired conservation results are not being attained and within 14 days the Adaptive Management Working Group…will convene to develop an interim response strategy and initiate an assessment to determine the causal factors."*	Replace with: "If two of the preceding indicators exceed 60% of normal variability in a single year or one of the preceding three indicators exceeds 40% of normal variability for 3 year time period within a 5 year range of analysis, desired conservation results are not being attained and within 14 days the Adaptive Management Working Group…will convene to develop an interim response strategy and initiate an assessment to determine the causal factors. A minimum of three consecutive years in a five year period is used to determine trends (i.e., Y1-2-3, Y2-3-4, Y3-4-5)"
GRSG-GRSGH-GL-006-Standard	2-67	*"Sagebrush removal in priority habitat management areas and sagebrush focal areas and in wintering habitat should be removal avoided unless necessary to support attainment of habitat conditions (Table 2-5)."*	Reference the WGFD protocol
GRSG-GRSGH-GL-	2-67	*"In priority and general habitat management areas and sagebrush focal areas, native plant species*	Please clarify this action by rewording to: "In priority and general habitat management areas and

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011-Guideline		*should be used, when possible, to restore, enhance, or maintain desired conditions (Table 2-5)."*	sagebrush focal areas, native plants species should be used, when possible, to restore, enhance, or maintain habitat to meet desired conditions displayed in Table 2-5."
FS-GRSGH-GL-012-Guideline	2-67	*"When breeding and nesting habitat overlaps with other seasonal habitats, habitat should be managed for breeding and nesting desired conditions (Table 1)."*	Reword to "When breeding and nesting habitat overlaps with other seasonal habitats, habitat should be managed for the type of habitat that is most needed by the species."
FS-TDDD-ST-013	2-67	Existing Standards: *"In priority habitat management areas and sagebrush focal areas, do not authorize new surface occupancy or surface disturbing activities on or within a 0.6 mile radius of the perimeter of occupied leks that are located in priority and sagebrush habitat management areas."*	Two changes are required in this standard. First, change *"sagebrush habitat management areas"* to "sagebrush focal areas." Second, add the following language: "The Authorized Officer may grant an exception if an environmental record of review determines that the action, as proposed or conditioned, would not impair the function or utility of the site for the current or subsequent seasonal habitat, life-history, or behavioral needs of Greater sage-grouse."
GRSG-TDDD-ST-015-Standard	2-68	This Standard is inconsistent with EO 2015-4. Wyoming does not establish a maximum standard - i.e., (not to exceed 20-24 dB), nor is there a buffer distance. Further, the appropriate time period is from 6:00 p.m. to 8:00 a.m.	USFS should adjust its Standard to be consistent with EO 2015-4 which provides: "New project noise levels, either individual or cumulative, should not exceed 10 decibels (as measured by L50) above baseline noise at the perimeter of a lek from 6:00 pm to 8:00 am during the breeding season (March 1 to May 15). Specific noise protocols for measurement and stipulations for implementation will be developed as additional research and information emerges."

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GRSG-TDDD-ST-016-Standard	2-68	Existing Standard: *"In-kind mitigation is preferred to out-of-kind mitigation. Where in-kind mitigation provides a net conservation gain to Greater Sage-Grouse, or where other habitat types are most limiting to populations, focus mitigation on habitats that provide the greatest benefit to the species. When approving mitigation requests, use the following hierarchy:* *1. Onsite (on lease)* *2. Offsite within the project's DDCT analysis area* *3. Offsite within the same priority or sagebrush focal area boundary* *4. Adjacent to the affected priority management areas or sagebrush focal area within the general habitat management area boundary* *5. Offsite within the same 2006 WAFWA Strategy determined Management Zone as the impact* *6. Other areas as identified by the local unit."*	Remove the hierarchy and use language that reflects what is best for the species. "In-kind mitigation is preferred to out-of-kind mitigation. Where in-kind mitigation provides a net conservation gain to Greater sage-grouse, or where other habitat types are most limiting to populations, focus mitigation on habitats that provide the greatest benefit to the species."
GRSG-TDDD-GL-017-Guideline	2-68	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 final sentence in the Guideline, insert: ", but not both."
GRSG-TDDD-GL-018-Guideline	2-68	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 final sentence in the Guideline, insert: ", but not both."

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GRSG-TDDD-GL-019-Guideline	2-68	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 final sentence in the Guideline, insert: ", but not both."
GRSG-TDDD-GL-023-Guideline	2-69	"*In priority habitat management areas and sagebrush focal areas, do not authorize surface disturbance and disruptive activities unless all existing discrete anthropogenic disturbances cover less than 5% of the suitable habitat in the surrounding area using the current Density Disturbance Calculation Tool process or its replacement, as described in Appendix D, and the new use will not cause exceedance of the 5% cap. An exception is described in GRSG-M-LM-ST-097-Standard.*"	Delete "and disruptive activities."
GRSG-INFRA-GL-024-Guideline	2-69	This Guideline conflicts with itself. Placing liquid gathering facilities inside priority areas reduces truck traffic, which is beneficial to Greater sage-grouse. Further, if liquid gathering or trucking is not allowed inside priority habitat management areas, there is no way to remove liquid production from the lease. This requirement conflicts with standard operational practices, compromises safety and is not feasible.	Delete the final bullet point: "Liquid gathering facilities should be placed outside priority habitat management areas and sagebrush focal areas. To reduce truck traffic and perching and nesting of ravens and raptors, tanks should not be placed at well locations."
GRSG-LR-SUA-ST-025-Standard	2-69	As drafted, this standard is inconsistent with EO 2015-4.	To address consistency with EO 2015-4, I request that the USFS adopt the following changes: "In priority habitat management areas and sagebrush

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			focal areas, restrict issuance of new special use authorizations for ~~infrastructure, such as high-voltage transmission lines, major pipelines~~ hydropower, ~~distribution lines,~~ and cellular towers (Map 2-13). Exceptions must be limited and based on rationale (e.g., monitoring, modeling, or best available science) that explicitly demonstrates that adverse impacts to greater sage-grouse will be avoided with the exception. Existing authorized uses will continue to be recognized. New transmission lines greater than 115 kV in PHMA (core only) would be allowed: 1) within the 2-mile wide transmission line route through PHMA (core only) population areas in south-central and southwestern Wyoming (see Attachment I to EO 2015-4); 2) when located within .05 miles or less of an existing 115 kV or greater transmission line or; 3) in RMP corridors authorized for above-ground transmission lines. 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. New electric distribution lines would be buried where feasible and cost-effective. If not feasible or cost-effective, distribution lines may be authorized when effectively designed/mitigated to protect Greater sage-grouse and the Authorized

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			Officer determines that overhead installation is the action alternative with the fewest adverse impacts while still meeting the project need. BLM-approved anti-perch devices would be installed on all new electric distribution lines within sagebrush and/or semiarid shrub-dominated habitats, unless NEPA analysis shows little or no benefit from the anti-perch devices. 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 constraints, utilize anti-perch devices where appropriate and constructed to the latest APLIC standards. New pipelines through PHMA would be allowed: 1) within an RMP corridor currently authorized for that use or designated through future RMP amendments; or 2) constructed adjacent to existing utilities (buried and above-ground) or roads. Where it is not practical to construct new pipelines in RMP corridors or adjacent to existing utilities or roads, BLM will complete a DDCT analysis to assure that the final route reduces impacts to sage-grouse where practical."
GRSG-LR-SUA-ST-026-Standard	2-69	This Standard is inconsistent with EO 2015-4 which establishes disturbance and activity threshold and applies to activities in PHMA only.	Revise the Standard as follows: "In priority ~~and general~~ habitat management areas and sagebrush focal areas, do not authorize temporary lands special use permits (i.e., facilities or activities) that result in loss of habitat if disturbance and activity

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			thresholds are exceeded ~~or would have long-term (i.e., greater than 5 years) negative impact on greater sage-grouse or their habitats~~."
GRSG-LR-SUA-ST-028-Standard	2-70	See GRSG-LR-SUA-ST-025-Standard comments. If addressed, this Standard is not necessary.	Delete the Standard.
GRSG-LR-SUA-ST-029-Standard	2-70		To address inconsistencies with EO 2015-4, I request the following changes: "In priority habitat management areas and sagebrush focal areas, new ~~power-~~electric distribution lines must not be located within 0.6 miles from the perimeter of occupied greater sage-grouse leks unless the proponent can demonstrate to the satisfaction of the AO that routing the line closer will have no adverse effects. Effective mitigation to protect greater sage-grouse is required. See Standards and Guidelines in the Timing, Distance, Density, and Disturbance section and see GRSG-INFRA-GL-001-Guideline."
GRSG-LR-SUA-ST-030-Standard	2-70	By applying this management prescription to general habitat, this Standard is inconsistent with EO 2015-4.	Revise this Standard as follows: "In priority ~~and general~~ habitat management areas and sagebrush focal areas, locate upgrades to existing transmission lines within the existing designated corridors or rights of-way unless an alternate route would benefit Greater sage-grouse or their habitats."
GRSG-LR-SUA-ST-030-	2-70		To address inconsistencies with EO 2015-4, I request the following changes: "In priority habitat

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Standard			management areas and sagebrush focal areas, outside of existing designated corridors, new ~~transmission~~ lower voltage distribution lines and pipelines should be buried to limit disturbance to the smallest footprint while still providing for worker safety during construction and reliable operation unless explicit rationale is provided that the biological impacts to Greater sage-grouse are being avoided. When new ~~transmission~~ lower voltage distribution lines and pipelines are not buried, locate them adjacent to existing transmission lines and pipelines where practicable."
GRSG-LR-LOA-ST-033-Standard	2-70	By applying this management prescription to general habitat, this Standard is inconsistent with EO 2015-4.	Revise this Standard as follows: "In priority ~~and general~~ management areas and sagebrush focal areas, do not approve landownership adjustments unless the action results in a net conservation gain to Greater sage-grouse or it will not directly or indirectly adversely impact Greater sage-grouse conservation."
GRSG-LR-LOA-ST-033-Standard	2-70	For PHMAs and GHMA the Standard provides: "*do not approve landownership adjustments unless the action results in a net conservation gain to Greater sage-grouse[.]*" 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 USFS 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..."
GRSG-LG-DC-	2-71	Existing Desired Condition: "*In priority and*	Remove general habitat management areas.

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037-Desired Condition		*general habitat management areas, livestock grazing is managed to ensure adequate nesting cover and does not conflict with the attainment of other vegetation attributes (Table 2-5).*" PHMAs are the areas where a higher standard is needed.	Reword to: "In priority habitat management areas, livestock grazing is managed to ensure adequate nesting cover and attain or move towards attainment of other vegetation attributes."
GRSG-LG-GL-038-Guideline	2-71	Existing Guideline: "*Grazing guidelines in Table 2-6 should be applied in each of the seasonal habitats in Table 2-6. If values in Table 2-6 cannot be achieved based upon a site-specific analysis using Ecological Site Descriptions, long-term ecological site capability analysis, or other similar analysis, adjust grazing management to move towards desired habitat conditions in Table 2-5 consistent with the ecological site capability. Do not use drought and degraded habitat condition to adjust values. Grazing guidelines in Table 2-6 would not apply to isolated parcels of National Forest System lands that have less than 200 acres of Greater sage-grouse habitat.*" Desired conditions may not always be met due to drought conditions, which occur regularly in the West. Livestock grazing management is usually adjusted when drought occurs and those adjustments likely benefit habitat. It is not acceptable to dictate through this document that drought conditions will not be considered.	Remove "drought and" from the guideline.
FS Table 2-6	2-71	*"Areas managed for breeding and nesting within 5.3 miles of occupied leks..."*	5.3 miles would cover most allotments and therefore make them subject to the stubble height guidelines. Nesting cover must be measured at the nest site and not within 5.3 miles of any lek. To

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			reduce confusion, add a sentence stating that nesting cover is measured at the nest site.
FS Table 2-6	2-71	*"Areas managed for brood rearing and summer habitat...Retain average stubble height of 4 inches..."*	Replace this with: "retain sufficient stubble height, as determined by ESDs, site capability and local variation, to enhance or maintain ecological function of the habitat."
GRSG-LG-GL-039-Guideline	2-71	Existing Guideline – *"On the Thunder Basin National Grassland, if 90% or more of the allotment falls within nesting or brood rearing habitat, 25% of the allotment would be exempted from the breeding/nesting residual perennial grass height guidelines in Table 2-6."* Allotments on all National Forest System Lands analyzed under the 9 Plan Amendment should receive this exemption.	Remove "Thunder Basin National Grassland"
GRSG-LG-GL-040-Guideline	2-71	Existing Guideline: *"In priority and general habitat management areas and sagebrush focal areas, when livestock grazing permits and/or grazing preference are voluntarily relinquished, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve where removal of livestock grazing would enhance the ability to achieve desired habitat conditions (Table 2-5)."*	Delete this action from the management plan.
GRSG-LG-GL-041-Guideline	2-72	The USFS does not allow for normal animal husbandry practices through this guideline, which is inconsistent with EO 2015-4. Existing Guideline: *"Bedding sheep and locating camps within 0.6 mi from the perimeter of a lek during*	Please add footnote 3 to the guideline. *"On a case-by-case basis, and only when it can be demonstrated that the activity will not cause declines in Greater sage-grouse populations, allow exceptions, modifications and waivers. The*

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		lekking (March 1 to May 15) should be restricted."	*Authorized Officer may grant an exception if a review determines that the action, as proposed or conditioned, would not impair the function or utility of the site for the current or subsequent seasonal habitat, live-history, or behavioral needs of Greater sage-grouse."*
GRSG-LG-GL-042-Guideline	2-72	*"Trailing livestock should be routed through non-habitat or in areas that will minimize impacts to Greater Sage-Grouse and their habitats. Specific routes and timeframes should be identified, existing trails should be used, and stopovers on occupied leks should be avoided."*	Clarify this guideline by rewording to: "From March 15 through June 30, trailing livestock should be limited to existing trails. Specific routes and timeframes should be identified and stopovers on leks should be avoided. New trailing activities should be assessed to determine a route that would minimize impacts to Greater sage-grouse and be routed through areas that are not PHMAs or SFAs."
GRSG-LG-043-Guideline	2-72	Existing Guideline: *"Collision risk associated with existing fences within 1.2 miles of leks should be minimized through removal or modification (e.g., marking, laydown fences, or other design features)."*	Please add footnote 3 to the guideline. *"On a case-by-case basis, and only when it can be demonstrated that the activity will not cause declines in greater sage-grouse populations, allow exceptions, modifications and waivers. The authorized officer may grant an exception if a review determines that the action, as proposed or conditioned, would not impair the function or utility of the site for the current or subsequent seasonal habitat, live-history, or behavioral needs of Greater sage-grouse."*
GRSG-LG-GL-044-Guideline	2-72	*"In priority habitat management areas and sagebrush focal areas, new permanent livestock*	Please add footnote 3 to the guideline. *"On a case-by-case basis, and only when it can be*

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		facilities, except fences, should not be constructed within 0.6 miles from the perimeter of occupied leks."	*demonstrated that the activity will not cause declines in greater sage-grouse populations, allow exceptions, modifications and waivers. The authorized officer may grant an exception if a review determines that the action, as proposed or conditioned, would not impair the function or utility of the site for the current or subsequent seasonal habitat, live-history, or behavioral needs of Greater sage-grouse."*
GRSG-R-ST-065-Standard	2-74	This Standard is inconsistent with EO 2015-4 which establishes disturbance and activity threshold and applies to activities in PHMA only.	Revise the Standard as follows: "In priority ~~and general~~ habitat management areas and sagebrush focal areas, do not authorize temporary recreation uses (i.e., facilities or activities) that result in loss of habitat if disturbance and activity thresholds are exceeded ~~or would have long term (i.e., greater than 5 years) negative impact on greater sage-grouse or their habitats~~."
GRSG-R-ST-066-Standard	2-74	By applying this management prescription to general habitat, this Standard is inconsistent with EO 2015-4.	Revise this Standard as follows: "In priority ~~and general~~ habitat management areas and sagebrush focal areas habitat management areas, terms and conditions that protect and restore Greater sage-grouse habitats within the permit area should be included in new recreation special use authorizations."
GRSG-RT-ST-069-Standard	2-74	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	To be consistent with EO 2015-4, I request that you modify this Standard as follows: "Restrict construction of new ~~category level 4 and 5~~ collector or arterial roads within 1.9 miles of the

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		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."	perimeter of occupied Greater sage-grouse leks…."
GRSG-M-FML-ST-083-Standard	2-75 through 2-76	This Standard requires noise mufflers, sound insulation, etc. on all compressor stations that are placed in habitat. This is inconsistent with EO 2015-4.	In order to address this inconsistency, delete this portion of the Standard.
GRSG-M-FMO-GL-092-Guideline	2-77	The USFS proposes to apply this guideline to general habitat management areas. This is inconsistent with EO 2015-4 which intends to create an incentive to develop outside of Core Population Areas. By applying a phased development approach (which may be beneficial in certain circumstances) outside of Core Population Areas, the USFS is diminishing the incentive to develop outside of Core Population Area.	To be consistent with EO 2015-4, I request that you modify this Guideline as follows: "In priority ~~and general~~ habitat management areas and sagebrush focal areas, to keep habitat disturbance at a minimum, a phased development approach should be applied to fluid mineral operations, wherever possible, consistent with the rights granted under the lease. Disturbed areas should be reclaimed as soon as they are no longer needed for mineral operations."
GRSG-M-MM-ST-100-Standard	2-78	"*Apply all restrictions listed in the Timing, Distance, Density and Disturbance section to authorizations for mineral material sales and free use.*"	Change this standard to a guideline.
FS Section Chapter 4	4-102	*Under LUP: "Grazing use guidelines under Alternative E would potentially affect about 419,090 acres in 150 allotments that support*	"Grazing use guidelines that limit forage use" – the "guidelines" are not limits according to the footnotes on Table 2-6. This must be corrected to

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		176,465 AUMs. Grazing use guidelines that limit forage use to 7 inches for perennial grasses during nesting season and 4 inches post nesting season would impact areas managed for nesting habitat within active grazing allotments (Table 4-42). The Proposed LUP Amendments grazing direction in areas managed for brood-rearing and summer habitat would potentially affect about 320,871 acres in 196 allotments that support 203,370 AUMs."	show that "7" and "4" are not required "limits". Table 2-6 says "manage for" not "limit forage use to".