



Wyoming
DEPARTMENT OF Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

July 26, 2018

Greater Sage Grouse EIS
Wyoming State Office
United States Bureau of Land Management
5353 Yellowstone Road
Cheyenne, WY 82009

Dear Ms. Fleuret,

Following are the Wyoming Department of Agriculture (WDA) comments regarding the Bureau of Land Management (BLM) Environmental Impact Statement (EIS) for proposed changes to the Greater Sage-Grouse Resource Management Plans in Wyoming.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

We have attached specific written comments to this letter for BLM's review (Attachment 1). We suggest special attention be placed on the analysis in Chapter 4, where many of the impacts are not accurately analyzed or consistent with the Executive Order. The proposed changes to Livestock Grazing Management Decisions are intended to align management better with existing regulations, the State of Wyoming's Sage Grouse Management Plan, and reduce unnecessary burdens on the agency and the permittees.

While many of our comments on the Proposed Action (Management Alignment Alternative) reduces duplicative language, they also continue protection for sage-grouse, and better clarify consistencies between existing regulations and the State's plan.

If you have any questions or concerns regarding our comments please give us a call to ensure there are no misunderstandings or misinterpretations in the intent of our proposed changes. The Policy Staff are committed to making themselves available and ensuring the changes are incorporated accurately in the amendment.

Thank you for the opportunity to comment and we look forward to working closely with you on finalizing the amendment process.

Sincerely,

Doug Miyamoto
Director

DM/jb

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming County Commissioner's Association

Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association
Public Lands Council

Equal Opportunity in Employment and Services

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Page	MD/Topic	Existing Language	Suggested Change	Updated Language (Clean)	Comments
ES-7	Livestock Grazing	Impacts on Greater Sage-Grouse as a result of proposed decisions associated with livestock grazing would not affect Greater Sage-Grouse conservation in Wyoming. Proposed changes to the habitat objectives and livestock grazing would result in impacts similar to those that would have occurred under previous management.	Impacts on Greater Sage-Grouse as a result of proposed decisions associated with livestock grazing would not affect Greater Sage-Grouse conservation in Wyoming. Proposed changes to the habitat objectives and livestock grazing would result in impacts similar to those that would have occurred under previous current management.	Impacts on Greater Sage-Grouse as a result of proposed decisions associated with livestock grazing would not affect Greater Sage-Grouse conservation in Wyoming. Proposed changes to the habitat objectives and livestock grazing would result in impacts similar to current management.	“Previous management” is unclear and could be either 1985 or 2015. Impacts associated with minor changes would not result in impacts to sage-grouse due to livestock grazing.
2-7	Table 2-2 Preamble	<p>Include as preamble to the tables—The purpose of the habitat objectives tables is to identify vegetation attributes important to Greater Sage-Grouse site selection as described in the habitat assessment framework. Indicators should be measured during the appropriate season, within the seasonal habitat being assessed, and in the context of the ecological potential for the site.</p> <p>Collectively, the indicators for sagebrush (cover, height, and shape), perennial grass, and perennial forb (cover, height, and/or availability) represent the desired vegetation components for the seasonal habitats. Indicators are not standards to be achieved but a metric used to evaluate habitat suitability within a home range.</p> <p>The habitat objectives tables outline range-wide attributes and values for each. Some of the science-based information used to determine the values in the Habitat Objectives tables was developed in disparate geographic regions and may not be based on local conditions. The BLM uses the best available information to ; specific values should be developed locally or at the project level. Data collected at each location (during the appropriate season) in Greater Sage-Grouse habitat is compared to each seasonal habitat indicator value in the tables. These indicator values would then be examined using a preponderance of evidence approach (BLM Technical Reference 1734-6) to determine seasonal habitat suitability within a home range and documented in a Greater Sage-Grouse habitat assessment.</p> <p>When completing site-scale assessments for Greater Sage-Grouse, it is not appropriate to use a single indicator to determine habitat suitability. Site-scale Greater Sage-Grouse habitat assessments inform the land health standard evaluation for the wildlife/special status species standard.</p> <p>Not all areas within a given habitat type would be</p>	<p>Include as preamble to the tables—The purpose of the habitat objectives tables is to identify vegetation attributes important to Greater Sage-Grouse site selection as described in the HHabitat aAssessment fFramework (HAF; Stiver 2015). Indicators should be measured during the appropriate season, within the seasonal habitat being assessed, and in the context of the ecological potential for the site.</p> <p>The habitat objectives tables outline range-wide attributes and values for each. Some of the science-based information used to determine the establish indicator values in the Habitat Objectives tables was developed in disparate geographic regions and may not be based onwill not reflect local conditions. The BLM is required to use the best available information toand specific values should be developed locally or at the project level.</p> <p>Collectively, the indicators for sagebrush (cover, height, and shape), perennial grass, and perennial forb (cover, height, and/or availability) represent the desired vegetation components for the seasonal habitats. Indicators are not standards to be achieved but a metric used to evaluate habitat suitability within a home rangeconditions. Data collected at each location during the appropriate season) in Greater Sage-Grouse habitat is compared to each seasonal habitat indicator value in the tables. These indicator values would then be examined using a preponderance of evidence approach (BLM Technical Reference 1734-6) to determine seasonal habitat suitability within a home range and documented in a Greater Sage-Grouse habitat assessment.</p> <p>The habitat objectives tables outline range-wide attributes and values for each. Some of the science-based information used to determine the values in the Habitat Objectives tables was developed in disparate geographic regions and may not be based on local conditions. The BLM uses the best available information</p>	<p>Include as preamble to the tables—The purpose of the habitat objectives tables is to identify vegetation attributes important to Greater Sage-Grouse site selection as described in the Habitat Assessment Framework (HAF; Stiver 2015). Indicators should be measured during the appropriate season, within the seasonal habitat being assessed, and in the context of the ecological potential for the site.</p> <p>The habitat objectives tables outline range-wide attributes and values for each. Some of the science-based information used to establish indicator values in the Habitat Objectives tables was developed in disparate geographic regions and will not reflect local conditions. The BLM is required to use the best available information and specific values should be developed locally or at the project level.</p> <p>Collectively, the indicators for sagebrush (cover, height, and shape), perennial grass, and perennial forb (cover, height, and/or availability) represent the desired vegetation components for the seasonal habitats. Indicators are not standards to be achieved but a metric used to evaluate habitat conditions. Data collected at each location (during the appropriate season) in Greater Sage-Grouse habitat is compared to each seasonal habitat indicator value in the tables. These indicator values would then be examined using a preponderance of evidence approach (BLM Technical Reference 1734-6).</p> <p>When completing site-scale assessments for Greater Sage-Grouse, it is not appropriate to use a single indicator to determine habitat suitability. Site-scale Greater Sage-Grouse habitat assessments inform the land health standard evaluation for the wildlife/special status species standard.</p> <p>Not all areas within a given habitat type will be capable of achieving the indicator values, due to inherent variation in vegetation communities and ecological site</p>	<p>The phrase “suitability within a home range” is not accurate and does not reflect the need to define “suitability” at the local level. Indicators are used to assess condition of habitat using values developed for each attribute, not habitat suitability; the HAF repeatedly notes this concept and states “habitat characteristics should be used as tools for assessing habitats” (HAF pg. 20), “suitability is determined by the relationship among the several indicator values” (HAF pg. 20) and “site suitability descriptions require an interpretation of the relationships between all of the indicators and other factors” (HAF pg. 29). As written, the language specific to “home range” does not reflect the HAF in its entirety or the 3rd and 4th Order of the HAF. Further, Wyoming has not defined “home ranges” for GRSG populations and the attributes in the table do not reflect habitat indicators for HAF 3rd Order (home range of a population; see HAF pages 7 and 17).</p> <p>The yellow highlighted text at left should be edited and moved up (as shown) to come before the paragraph beginning with “Collectively, the indicators for sagebrush...” to improve clarity.</p> <p>The blue highlighted text was moved up and edited (as shown).</p>

		<p>capable of achieving the indicator values, due to inherent variation in vegetation communities and ecological site potential. Further, local data supported BLM-approved data collection protocols or most recent available science may indicate Greater Sage-Grouse select for vegetation structure and composition not characterized by values in the table.</p> <p>The values in the tables should be considered as initial references and do not preclude development of local desired conditions or utilizing other indicators/values, based on site selection preferences of the local population and ecological site capability of sagebrush communities.</p>	<p>to; specific values should be developed locally or at the project level. Data collected at each location (during the appropriate season) in Greater Sage-Grouse habitat is compared to each seasonal habitat indicator value in the tables. These indicator values would then be examined using a preponderance of evidence approach (BLM Technical Reference 1734-6) to determine seasonal habitat suitability within a home range and documented in a Greater Sage-Grouse habitat assessment.</p> <p>When completing site-scale assessments for Greater Sage-Grouse, it is not appropriate to use a single indicator to determine habitat suitability. Site-scale Greater Sage-Grouse habitat assessments inform the land health standard evaluation for the wildlife/special status species standard.</p> <p>Not all areas within a given habitat type would-will be capable of achieving the indicator values, due to inherent variation in vegetation communities and ecological site potential. Further, local data supported BLM-approved data collection protocols or most recent available science may indicate Greater Sage-Grouse select for vegetation structure and composition not characterized by values in the table.</p> <p>The values in the tables should be considered as initial references and do not preclude development of local desired conditions or utilizing other indicators/values, based on site selection preferences of the local population and ecological site capability of sagebrush communities.</p>	<p>potential. Further, local data supported BLM-approved data collection protocols or most recent available science may indicate Greater Sage-Grouse select for vegetation structure and composition not characterized by values in the table.</p> <p>The values in the tables should be considered as initial references and do not preclude development of local desired conditions or utilizing other indicators/values, based on site selection preferences of the local population and ecological site capability of sagebrush communities.</p>	
2-7	Table 2-2	<p>Adequate nesting cover is determined by ESD site potential or best available science in consideration of local variability.</p>	<p>Adequate nesting cover is-as determined by ESD site potential or best available science in consideration of local variability.</p>	<p>Adequate nesting cover as determined by ESD site potential or best available science in consideration of local variability.</p>	<p>This section pertains to the removal of ≥ 7" in Table 2-2. While it appears that this is actually a change within the table it is not entirely clear. Please clearly state that this is a replacement of the numeric value with this language and replace "is" with "as".</p>

2-12	MD LG 10	<p>In PHMA, for riparian and/or wet meadow communities utilized by Greater Sage-Grouse, livestock grazing management would be balanced to promote the production and availability of beneficial grasses and forbs for use during late brood-rearing, while maintaining upland conditions and functions.</p>	<p>In PHMA, for riparian and/or wet meadow communities utilized by Greater Sage-Grouse, livestock grazing management would be <u>managed/balanced</u> to promote the production and availability of beneficial grasses and forbs for use during late brood-rearing, while maintaining upland conditions and functions.</p>	<p>In PHMA, for riparian and/or wet meadow communities utilized by Greater Sage-Grouse, livestock grazing would be managed to promote the production and availability of beneficial grasses and forbs for use during brood-rearing, while maintaining upland conditions and functions.</p>	<p>The word “late” was inadvertently left in during edits of MD LG 10 and later leads to issues within the analysis portion of the document. The intention of this MD is to maintain production and availability of beneficial grasses and forbs during brood rearing, not just late brood-rearing, and to remove the reference to nesting season that is in the No Action Alternative (current management). Additionally, the original reference in MD LG 10 to “balanced grazing” is not tangible and should be changed to reflect proper management of riparian areas.</p>
4-16	Habitat Objectives	<p>The Management Alignment Alternative proposes to include clarifying language for the intent of the habitat objectives tables. It also would modify the value of a greater than or equal to 7 inches for perennial grass and forb height indicator to reflect ESD site potential or best available science in consideration of local variability. Impacts associated with this alternative would be similar to those identified in the No-Action Alternative in the ARMPA’s Final EIS. This would not affect Greater Sage-Grouse conservation in Wyoming.</p> <p>It is likely that the impacts of clarifying language for the intent of the habitat objectives tables and modifying the 7-inch indicator for perennial grass and forb height would be minimal. There are existing mechanisms throughout the ARMPA and other RMPs that allow for adjustments, if necessary. Because the Management Alignment Alternative continues to stress the important of providing nesting cover, local impacts on Greater Sage-Grouse would also be minor.</p>	<p>The Management Alignment Alternative proposes to include clarifying language for the intent of the habitat objectives tables. It also would modify the value of a greater than or equal to 7 inches for perennial grass and forb height indicator to reflect ESDs, site potential, or best available science in consideration of local variability. Impacts associated with this alternative would be similar to those identified in the No-Action Alternative in the ARMPA’s Final EIS. Because the Management Alignment Alternative continues to stress the importance of providing nesting cover, local impacts on Greater Sage-Grouse would also be minor.</p> <p>This would not affect Greater Sage-Grouse conservation in Wyoming.</p> <p>It is likely that the impacts of clarifying language for the intent of the habitat objectives tables and modifying the 7-inch indicator for perennial grass and forb height would be minimal. There are existing mechanisms throughout the ARMPA and other RMPs that allow for adjustments, if necessary. Because the Management Alignment Alternative continues to stress the important of providing nesting cover, local impacts on Greater Sage-Grouse would also be minor.</p>	<p>The Management Alignment Alternative proposes to include clarifying language for the intent of the habitat objectives tables. It also would modify the value of a greater than or equal to 7 inches for perennial grass and forb height indicator to reflect ESDs, site potential, or best available science in consideration of local variability. Impacts associated with this alternative would be similar to those identified in the No-Action Alternative. Because the Management Alignment Alternative continues to stress the importance of providing nesting cover, local impacts on Greater Sage-Grouse would be minor. This would not affect Greater Sage-Grouse conservation in Wyoming.</p>	<p>Changes to the table would NOT be similar to the No-Action Alternative of the 2015 ARMPA. The No-Action Alternative from 2015 does not have a table.</p> <p>Remove redundant and confusing language in the second paragraph. The last sentence of paragraph 2 was moved up into paragraph 1 (highlighted at left).</p>
4-16 and 4-17	Livestock Management – Permit Renewals	<p>The Management Alignment Alternative does not include a requirement for incorporation of terms and conditions for achieving the habitat objectives; rather, it requires achievement of Land Health Standard #4 (Wildlife/special status species). Standard #4 achievement would still be required to rely on meeting habitat objectives identified in either the Land Health Standards (Habitat Assessment Framework [HAF]); therefore, the impacts of this action would be similar to the No-Action alternative as analyzed in the RMPA’s No-Action Alternative (Alternative A), beginning on page 4-</p>	<p>The Management Alignment Alternative does not include a requirement for incorporation of terms and conditions for achieving the habitat objectives <u>in Table 2-2</u>; rather, it requires achievement of Land Health Standard #4 (Wildlife/special status species). Standard #4 achievement would still be required to rely on meeting habitat objectives identified in either the Land Health Standards (Habitat Assessment Framework [HAF]); therefore, the impacts of this action would be similar to the No-Action alternative <u>(current management)</u>, as analyzed in the RMPA’s No-Action</p>	<p>The Management Alignment Alternative does not include a requirement for incorporation of terms and conditions for achieving the habitat objectives in Table 2-2; rather, it requires achievement of Land Health Standard #4 (Wildlife/special status species) ; therefore, the impacts of this action would be similar to the No-Action alternative (current management).</p> <p>The Management Alignment Alternative does not have an explicit requirement for analysis of thresholds and responses during permit renewal or modification;</p>	<p>Paragraph 1 references page 4-90 which states: “Adjustments to livestock grazing management would impact livestock grazing permittees/lessees on allotments managed by the BLM not meeting the Wyoming Standards for Rangeland Health due to existing livestock grazing management. Such adjustments could include season-of-use changes, changes in stocking rates, implementation of improved grazing management practices (e.g., growing season deferral, riparian pastures, and enclosures), forage utilization limits, and conversions in kind or type of</p>

	<p>90 of the 2015 Final EIS for the RMPAs.</p> <p>The Management Alignment Alternative does not have an explicit requirement for analysis of a threshold to trigger the response; however, it says the analysis, if done, should also identify the location, timing, frequency, and methods used for monitoring conditions and determining when adjustments are necessary. The impacts of changing when and how analysis should be conducted would be similar to those described for Alternative A in the 2015 Final EIS for the RMPA No-Action Alternative.</p> <p>Under the Management Alignment Alternative, permit renewals in PHMA where the wildlife/special status species standard is not being met would include actions necessary to achieve or make progress toward achieving the standard in accordance with 43 CFR 4180. If needed, it may include actions to maintain or improve Greater Sage-Grouse habitat, resulting in no impact or beneficial effects.</p> <p>Strict requirements to analyze thresholds and responses for Greater Sage-Grouse habitat based on the habitat objectives table would be removed. Under the Management Alignment Alternative, if NEPA analysis is required, one alternative would include mechanisms to make adjustments to meet or make progress toward meeting the wildlife/special status species standard. This management change is commensurate with the threat grazing poses to Greater Sage-Grouse and relies on BLM's existing grazing regulations. The impacts would be similar to No-Action.</p> <p>The Management Alignment Alternative also identifies how and when the BLM would consider Greater Sage-Grouse habitat maintenance or improvement if the current authorized use is identified as a significant factor that contributes to failing to achieve the standard in accordance with 43 CFR 4180.2. This regulation requires the BLM to formulate, propose, and analyze appropriate action to address the failure to meet the standards or conform to the guidelines when the BLM Authorized Officer determines that existing grazing management or level of use are significant factors in failure. Similar to the No-Action Alternative, the Management Alignment Alternative would emphasize balanced grazing between riparian areas/wet meadows</p>	<p>Alternative (Alternative A), beginning on page 4-90 of the 2015 Final EIS for the RMPAs.</p> <p>The Management Alignment Alternative does not have an explicit requirement for analysis of a threshold to trigger the response; thresholds and responses during permit renewal or modification; however, it says the analysis, if done, should also identify the location, timing, frequency, and methods used for monitoring conditions and determining when adjustments are necessary would require the analysis of one alternative that allows for adaptive management to meet or make progress towards meeting the Wildlife/SSS Standard. The impacts of changing when and how analysis should be conducted would be similar to those described for Alternative A in the 2015 Final EIS for the RMPA No-Action Alternative. Impacts associated with this change would not affect Greater Sage-Grouse conservation in Wyoming.</p> <p>Under the Management Alignment Alternative, permit renewals in PHMA where the wildlife/special status species standard is not being met would include actions necessary to achieve or make progress toward achieving the standard in accordance with 43 CFR 4180. If needed, it may include actions to maintain or improve Greater Sage-Grouse habitat, resulting in no impact or beneficial effects; current livestock grazing is a significant causal factor in failure to achieve the Wildlife/SSS Standard and GRSG are affected, livestock grazing management would be adjusted to achieve or make progress towards achieving the Standard, including action to improve or maintain GRSG habitat as needed. Similar to the No-Action Alternative, the Management Alignment Alternative would emphasize balanced grazing between riparian areas/wet meadows and uplands to promote beneficial grass and forb abundance during brood-rearing season for Greater Sage-Grouse in PHMA. If implemented, these actions could result in beneficial effects to GRSG habitat.</p> <p>Strict requirements to analyze thresholds and responses for Greater Sage-Grouse habitat based on the habitat objectives table would be removed. Under the Management Alignment Alternative, if NEPA analysis is required, one alternative would include mechanisms to make adjustments to meet or make progress toward meeting the wildlife/special status species standard.</p>	<p>however, it would require the analysis of one alternative that allows for adaptive management to meet or make progress towards meeting the Wildlife/SSS Standard Impacts associated with this change would not affect Greater Sage-Grouse conservation in Wyoming.</p> <p>Under the Management Alignment Alternative, permit renewals in PHMA where the wildlife/special status species standard is not being met would include actions necessary to achieve or make progress toward achieving the standard in accordance with 43 CFR 4180. If current livestock grazing is a significant causal factor in failure to achieve the Wildlife/SSS Standard and GRSG are affected, livestock grazing management would be adjusted to achieve or make progress towards achieving the Standard, including action to improve or maintain GRSG habitat as needed. Similar to the No-Action Alternative, the Management Alignment Alternative would emphasize balanced grazing between riparian areas/wet meadows and uplands to promote beneficial grass and forb abundance during brood-rearing season for Greater Sage-Grouse in PHMA. If implemented, these actions could result in beneficial effects to GRSG habitat.</p> <p>The impacts of implementing the Management Alignment Alternative for livestock grazing/permit renewals would be similar to current management (No Action). This would not affect Greater Sage-Grouse conservation in Wyoming.</p>	<p>livestock. Such management changes could result in increased operating costs to the livestock operator. There are 186 out of 574 BLM allotments within core habitat not meeting the current RMP standards due to livestock grazing. Adjusting grazing practices during times of drought would occur across the National Forest and BLM Field Offices. Although these actions would help to enhance rangeland conditions and increase long-term forage production, animal unit months (AUMs) use could also decrease for some operators." While impacts may be similar to livestock grazing permittees, this section implies there would be a negative impact to GRSG. Changes proposed in this analysis would not be similar to the No Action Alternative from 2015 because there are still management prescriptions for GRSG where there would have been none under the No Action Alternative from 2015.</p> <p>Paragraph 2 does not reflect reality or information provided earlier in the document. Please incorporate our edits.</p> <p>Paragraph 3 was not accurate. Please incorporate our edits.</p> <p>Paragraph 4 is redundant and confusing. Remove.</p> <p>Paragraph 5 is redundant with exception of the last sentence regarding "balancing grazing in upland and riparian areas". The last sentence was added to paragraph 3 revisions (highlighted)</p> <p>Paragraph 6 says changes would remove all management for GRSG and is incorrect. Changes proposed would keep management similar to the current management (No Action). Please incorporate our edits.</p>
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		<p>and uplands to promote beneficial grass and forb abundance during brood-rearing season for Greater Sage-Grouse in PHMA.</p> <p>The impacts of implementing the Management Alignment Alternative for livestock grazing/permit renewals would be similar to those for the No-Action Alternative for the 2015 Final EIS for the 2015 RMPs.</p>	<p>This management change is commensurate with the threat grazing poses to Greater Sage-Grouse and relies on BLM's existing grazing regulations. The impacts would be similar to No-Action.</p> <p>The Management Alignment Alternative also identifies how and when the BLM would consider Greater Sage-Grouse habitat maintenance or improvement if the current authorized use is identified as a significant factor that contributes to failing to achieve the standard in accordance with 43 CFR 4180.2. This regulation requires the BLM to formulate, propose, and analyze appropriate action to address the failure to meet the standards or conform to the guidelines when the BLM Authorized Officer determines that existing grazing management or level of use are significant factors in failure. Similar to the No-Action Alternative, the Management Alignment Alternative would emphasize balanced grazing between riparian areas/wet meadows and uplands to promote beneficial grass and forb abundance during brood-rearing season for Greater Sage-Grouse in PHMA.</p> <p>The impacts of implementing the Management Alignment Alternative for livestock grazing/permit renewals would be similar to those for the No-Action Alternative for the 2015 Final EIS for the 2015 RMPs-current management (No Action). This would not affect Greater Sage-Grouse conservation in Wyoming.</p>		
4-17	Livestock Management – Existing Range Improvement Structures	<p>The impacts associated with the proposed change to MD LG 8 from the ARMPA would be minimal. The only changes between the existing management decision and the Management Alignment Alternative is to remove the requirement for the BLM to assess the potential risk to Greater Sage-Grouse and its habitats from existing structural range improvements. The potential for modification of those improvements identified as posing a risk would be evaluated and the requirement in GHMA would be removed.</p> <p>The BLM would be required to analyze the impact of modifying range improvements, regardless of habitat type, and the risk to Greater Sage-Grouse and other resources would need to be evaluated in any case. Because of this, there would be minimal differences between the impacts of these alternatives; however, there is the potential for increased risk of exposure to West Nile virus or other risks to Greater Sage-Grouse if structural range improvements go unevaluated for long</p>	<p>The impacts associated with the proposed change to MD LG 8 from the ARMPA would be minimal. <u>The BLM would still be required to evaluate and modify existing range improvements in PHMA; therefore there is no impact to Sage-Grouse conservation in Wyoming.</u></p> <p>The only changes between the existing management decision and the Management Alignment Alternative is to remove the requirement for the BLM to assess the potential risk to Greater Sage-Grouse and its habitats from existing structural range improvements. The potential for modification of those improvements identified as posing a risk would be evaluated and the requirement in GHMA would be removed.</p> <p>The BLM would be required to analyze the impact of modifying range improvements, regardless of habitat type, and the risk to Greater Sage-Grouse and other resources would need to be evaluated in any case. Because of this, there would be minimal differences</p>	<p>The impacts associated with the proposed change to MD LG 8 from the ARMPA would be minimal. The BLM would still be required to evaluate and modify existing range improvements in PHMA; therefore there is no impact to Sage-Grouse conservation in Wyoming.</p>	<p>This is incorrect; changes to MD LG 8 do not “remove the requirement for the BLM to assess the potential risk to Greater Sage-Grouse and its habitats from existing structural range improvements.” MD LG 8 says: “In PHMAs, existing range improvements (e.g., fences, livestock/wildlife watering facilities) will continue to be evaluated and modified when necessary. Supplements and supplemental feeding will continue to be authorized where appropriate.” which would require the BLM to “continue to evaluate and modify when necessary” meaning they would have to analyze them.</p> <p>Changes proposed in the Management Alignment Alternative remove redundant and unnecessary language, not requirements to analyze range improvements in PHMA. Please incorporate our edits.</p>

		periods; therefore, there is the potential for a local adverse impact on Greater Sage-Grouse if existing range improvements are not periodically evaluated for risks to Greater Sage-Grouse.	between the impacts of these alternatives; however, there is the potential for increased risk of exposure to West Nile virus or other risks to Greater Sage-Grouse if structural range improvements go unevaluated for long periods; therefore, there is the potential for a local adverse impact on Greater Sage-Grouse if existing range improvements are not periodically evaluated for risks to Greater Sage-Grouse		
4-17 and 4-18	Livestock Management – Riparian Area Management	<p>The impacts associated with the Management Alignment Alternative for riparian area management would be similar to those identified in the No-Action Alternative. There would be the potential for some disruption and impacts to occur on nesting and early brood-rearing habitat for Greater Sage-Grouse as a result of the Management Alignment Alternative both in PHMA and GHMA.</p> <p>Livestock grazing management would be adjusted if needed to promote the production and availability of beneficial grasses and forbs for use during late brood-rearing, as opposed to also including nesting and early brood-rearing habitat (as identified in the No-Action Alternative). Because of this, there may be impacts on the nesting and early brood-rearing habitat in riparian areas. This would likely result in local adverse impacts on Greater Sage-Grouse. This would be the case in areas where livestock grazing is not balanced to promote beneficial forbs and grasses in nesting and early brood-rearing habitat, especially in GHMA; however, it would not be likely to affect the conservation of Greater Sage-Grouse in Wyoming</p>	<p>The impacts associated with the Management Alignment Alternative for riparian area management would be similar to those identified in the No-Action Alternative. There would be the potential for some disruption and impacts to occur on nesting and early brood-rearing habitat for Greater Sage-Grouse as a result of the Management Alignment Alternative both in PHMA and GHMA.</p> <p>Livestock grazing management would be adjusted if needed to promote the production and availability of beneficial grasses and forbs for use during late brood-rearing, as opposed to also including nesting and early brood-rearing habitat (as identified in the No-Action Alternative). These changes would not affect Greater Sage-Grouse conservation in Wyoming. Because of this, there may be impacts on the nesting and early brood-rearing habitat in riparian areas. This would likely result in local adverse impacts on Greater Sage-Grouse. This would be the case in areas where livestock grazing is not balanced to promote beneficial forbs and grasses in nesting and early brood-rearing habitat, especially in GHMA; however, it would not be likely to affect the conservation of Greater Sage-Grouse in Wyoming</p>	<p>The impacts associated with the Management Alignment Alternative for riparian area management would be similar to those identified in the No-Action Alternative.</p> <p>Livestock grazing management would be adjusted if needed to promote the production and availability of beneficial grasses and forbs for use during brood-rearing, as opposed to also including nesting habitat (as identified in the No-Action Alternative). These changes would not affect Greater Sage-Grouse conservation in Wyoming.</p>	<p>See comments above on MD LG 10.</p> <p>Changes proposed by WDA in MD LG 10 -would make this analysis incorrect and Chapter 4 should be updated to reflect this.</p>
4-37	Environmental Consequences	<p>The Management Alignment Alternative proposes to modify livestock grazing actions for riparian area management and range improvement projects. Analysis indicates that there is a potential for localized adverse impacts on Greater Sage-Grouse; however, the BLM would be required to analyze the impact of modifying range improvements and riparian management, regardless of habitat type, under management prescriptions analyzed in the 2014 and 2015 Final EISs; therefore, the additive impact of this change at a population level would be minimal.</p> <p>Under the Management Alignment Alternative, language would be modified in the habitat objectives table. The proposed preamble language is intended to</p>	<p>The Management Alignment Alternative proposes to modify minor changes to language regarding livestock grazing management in riparian areas and with range improvement projects. Analysis indicates that there is a potential for localized adverse impacts on Greater Sage-Grouse; however, the BLM would be required to analyze the impact of modifying range improvements and riparian management, regardless of habitat type, under management prescriptions analyzed in the 2014 and 2015 Final EISs; therefore, the additive impact of this change at a population level would be minimal. The impact of these changes would be minimal and would not impact Greater Sage-Grouse conservation in Wyoming.</p>	<p>The Management Alignment Alternative proposes minor changes to language regarding livestock grazing management in riparian areas and with range improvement projects. The impact of these changes would be minimal and would not impact Greater Sage-Grouse conservation in Wyoming.</p> <p>Under the Management Alignment Alternative, language would be modified in one part of the habitat objectives table and a preamble would be added. The proposed preamble language is intended to clarify the use of the tables and does not alter management actions associated with the tables. The modified language for perennial grass height expresses reliance on best available science to define appropriate</p>	<p>Paragraph 1: We question what “analysis indicates there is a potential for localized adverse impacts” due to changes to the language regarding riparian area management and range improvement projects. The statement regarding requirements to “analyze the impact of modifying range improvements and riparian management” is also incorrect. MD LG 8 (Range Improvements) and MD LG 10 (Riparian/Wet meadow management) are intended to improve management and help meet the Standards for Healthy Rangelands, as opposed to the overly onerous requirements that were included before. We strongly believe the changes proposed would actually benefit GRSG through more logical management, not create localized impacts as stated. Please incorporate our changes.</p>

		<p>clarify the use of the tables and does not alter management actions associated with the tables. The modified language for perennial grass height expresses reliance on best available science to define appropriate perennial grass height. This is also included in the No-Action Alternative and does not preclude the use of the science supporting the objective defined by the No-Action Alternative. Because the Management Alignment Alternative either does not alter management actions or is included in the No-Action Alternative, there is no additive impact of this change.</p>	<p>Under the Management Alignment Alternative, language would be modified in <u>one part of</u> the habitat objectives table <u>and a preamble would be added</u>. The proposed preamble language is intended to clarify the use of the tables and does not alter management actions associated with the tables. The modified language for perennial grass height expresses reliance on best available science to define appropriate perennial grass height. This is also included in the No-Action Alternative and does not preclude the use of the science supporting the objective defined by the No-Action Alternative. Because the Management Alignment Alternative either does not alter management actions or is included in the No-Action Alternative, there is no additive impact of this change- <u>and would not impact Greater Sage-Grouse conservation in Wyoming.</u></p>	<p>perennial grass height. This does not preclude the use of the science supporting the objective defined by the No-Action Alternative. Because the Management Alignment Alternative either does not alter management actions or is included in the No-Action Alternative, there is no additive impact of this change and would not impact Greater Sage-Grouse conservation in Wyoming.</p>	<p>Paragraph 1 also talks about the “population level” while other sections have referred to “Greater Sage-Grouse conservation in Wyoming” (state level) or “local level”. The BLM should analyze everything at the same scale throughout the document.</p> <p>Paragraph 2 changes are intended to clarify what is being done within the Management Alignment Alternative.</p>
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