

**From:** [DeBerry, Drue](#)  
**To:** [Berglund, Jeff](#)  
**Cc:** [Pat Deibert](#); [Jodi Bush](#)  
**Subject:** Re: Review of Update Version - Draft Range Wide Transmission Line BMPs - By Sept 10th Noon PT; 1PM MT  
**Date:** Monday, September 09, 2013 1:27:51 PM

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I was just telling Lief this morning I wasn't sure how much feedback we'd get from the field given short timeframe, but that you would make time to offer valuable insight. Much appreciated. You da man.

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On Mon, Sep 9, 2013 at 1:22 PM, Berglund, Jeff <[jeff\\_berglund@fws.gov](mailto:jeff_berglund@fws.gov)> wrote:

Hi Drue. The document's a good start, but still doesn't contain many BMP specifics. That said, here are some general comments (there are no page numbers in the document, so I used headings where possible). Thanks for the chance to review and good luck with the meeting. I've also included the track changes version in case there are questions (my comments are "USFWS" - I'm not sure where all the other ones came from).

Section 4.4: The COT Report should be referenced somewhere in this section.

Section 7.0: Should include / reference / address infrastructure measures from COT Report (p 51-52) in this section.

Section 7.0/I/i/2/a: Should define "crucial sagebrush habitats" and include PACs. Also, disturbance density consideration should be mentioned. In some states (and BLM RMPs within states), disturbance caps are or will soon be in place.

Section 7.0/I/i/2/c: The goal should be to adhere to buffers and avoid disturbance within them. The phrase "Avoid sage-grouse buffers" could be confusing.

Section 7.0/I/i/2/c/i: Should pertain to utility corridors also.

Section 7.0/I/i/2/c/ii: Suggest steering first to non- or unsuitable habitat, then secondly to low-quality habitat.

Section 7.0/I/i/2/c/iv: Unclear what "where allowable" means – why would staging outside of sagebrush not be allowed?

Section 7.0/I/i/2/c/v: Aren't cutting and mowing the same thing in grassland? Suggest cutting rather than grubbing, or something similar.

Section 7.0/I/i/2/c/vi: Suggest "outside of", rather than "prior to" nesting season.

Section 7.0/II/a: It is important to distinguish that the primary goal should be to avoid impacts to nesting and nesting habitat where possible / feasible through siting (e.g., larger lek buffers [4 mi commonly cited]); secondary goal is avoidance of disturbance to lek activity.

Section 7.0/II/b: Unclear what "Reference Plans" means – just that buffers are shown on the plans? Should clarify.

Section 7.0/V: What about compensatory mitigation (offsets) for unavoidable losses? This should be included.

Section 7.0/V/b: Should also include states.

Under "Determining Suitability of Habitat": Upon what literature / studies are the proposed 1 km, 2km, and 3km buffers based? These may be inadequate.

"Recommended practices or related stipulations from sage-grouse conservation plans that may not be feasible or recommended to reduce nesting or perching of raptors or corvids on new lines": It is not clear what this is supposed to be – a heading for an eventual list of previously recommended but infeasible measures?

Mitigation I: There may be additional triggers – compliance with state executive orders, permit / easement conditions, etc.

Mitigation II: The major compensatory mitigation considerations are missing here – habitat restoration, habitat acquisition, conservation easements, removal of unused infrastructure, etc. Also should include discussion of how to mitigate temporal impacts (mitigate in advance of impacts; increase replacement ratios, etc.).

Mitigation II/c: How are construction easements mitigation? This should be explained.

Mitigation IV: Why aren't these items included in the mitigation toolbox under II?. Suggest combining these.

Mitigation IV/a: What are co-owned lands, and why is co-ownership a requirement?

Section 12.0: Should add Knick et al (2013) and cite effects associated with disturbance % and powerline densities, etc.

On Thu, Sep 5, 2013 at 2:55 PM, DeBerry, Drue <[drue\\_deberry@fws.gov](mailto:drue_deberry@fws.gov)> wrote:

Project Leaders,

I just received the revised draft transmission line BMPs for sage-grouse habitat from APLIC. [If you have staff who are able to provide feedback, please ask them to provide it to me by Tuesday Sept 10th Noon Pacific Time/1PM Mountain Time.](#) For specific comments, please ask them to cite page number and issue in a separate document and to provide literature citations for any suggested additions or changes to the BMPs.

APLIC wants to finalize the BMPs by October. The APLIC group will meet in Denver Sept 11 and 12

to generate a final draft. Pat Deibert, Lief Wiechman and I will represent the Service at the meeting, operating with the feedback we have received from your field staff. I have strongly encouraged the APLIC group to provide sufficient time for the Service to review the final draft and anticipate circulating that back out to you to review following the meeting.

The Service will not endorse the BMPs, however the BMPs do provide an opportunity for the Service to improve consistency when providing input on transmission line projects across the sage-grouse range. The hope is that by providing input on the development of these BMPs, barring new science, the Service will avoid any future major surprises and have few minor ones that deviate from the BMPs. Any details we can suggest adding that will have range wide applicability will improve the document.

**In addition to providing general feedback, input on the following questions would be helpful:**

Do you have specific examples in addition to those in the BMP draft of negative impacts to sage-grouse from transmission lines that should be included in the document?

Are there any additional literature citations that provide the basis of direct or indirect transmission line impacts to sage-grouse?

Do you know of any examples of transmission line operations applying BMPs to existing transmission lines? i.e. looking for ways to minimize impacts to already constructed transmission lines?

Do you have any suggestions for BMPs related to co-location?

Are there any BMPs that aren't included in this document that could be applied range wide and should be added?

Thanks,

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