United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Idaho State Office
1387 South Vinnell Way
Boise, Idaho 83709-1657

In Reply Refer To:
1610 (931)

AUG 0 6 2015

Honorable C.L. "Butch" Otter
Governor of Idaho
P.O. Box 83720
Boise, ID 83720

Dear Governor Otter,

This is in response to your letter dated July 28, 2015, which provided your consistency review of the Idaho and Southwestern Montana Greater Sage-Grouse Proposed Resource Management Plan (PRMP). The Governor's consistency review is an important part of the Bureau of Land Management (BLM's) land use planning process. Partnership between the State and the BLM is an integral part of successful land management. Our partnership is particularly important as we work to address the threats to Greater Sage-Grouse (GRSG) and its habitat to conserve the species and hopefully avoid a determination by the Fish and Wildlife Service (FWS) that the species is warranted for listing under the Endangered Species Act (ESA). We greatly appreciate the leadership that your team has provided in this regard as well as the time and attention of you and your staff on this important effort.

The Idaho and Southwestern Montana Greater Sage-Grouse PRMP is part of an unprecedented and proactive partnership to conserve GRSG and its habitat by incorporating conservation measures in the land use plans. The plans build upon the foundation for sage-grouse conservation initiated by the state of Idaho's three-tiered conservation approach and adaptive management framework. The plans also reflect guidance developed by the BLM to incorporate FWS feedback on the draft plans. The PRMPs were developed in coordination with a range of stakeholders and cooperators, including state fish and wildlife agencies and the Western Governors Association Sage-Grouse Task Force.

The purpose of the GRSG planning effort is to identify and incorporate conservation measures to conserve, enhance and restore GRSG habitat by reducing, minimizing, or eliminating threats to that habitat in a manner that provides sufficient regulatory certainty to the FWS that will hopefully support a finding that Endangered Species protection is not warranted. The plans were developed in collaboration with state officials to reflect local ecological conditions and resource needs by incorporating many measures recommended by the State. In order to provide a high degree of certainty for regulatory mechanisms, the BLM has included some common elements across the range to address specific threats to the bird and to provide for a net conservation gain

to GRSG and its habitat to reduce the need to list the species under the ESA. The plans allow for state-based variations where difference approaches or priorities were consistent with the overall conservation objectives, and can continue to provide adequate regulatory certainty.

The BLM is able to address some of the concerns outlined in your letter either through a change or a commitment to clarify our intent, particularly with regard to range management objectives. The BLM looks forward to continued collaboration with the State in the coming weeks to finalize that language. The standard for review and the specific responses to issues raised is found below.

Statutory and Regulatory Framework for Consistency Review

In considering your recommendations, I am guided by the BLM's planning regulations in 43 C.F.R. §1610.3-2. These regulations implement Section 202 (c)(9) of the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, 43 U.S.C. § 1712(c)(9), which states in part:

> In the development and revision of land use plans, the Secretary shall...to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, including, but not limited to, the statewide outdoor recreation plans developed under the Act of September 3, 1964 (78 Stat. 897), as amended [16 U.S.C. 460l–4 et seq. note], and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, to the extent he finds practical, keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

The regulations state that Resource Management Plans (RMPs) and amendments to RMPs "shall be consistent with officially approved or adopted resource related plans, and the policies and programs contained therein" of State and local governments and Indian Tribes "so long as the guidance and resource management plans [of the State and local government and Tribe] are also consistent with the purposes, policies, and programs of Federal laws and regulations applicable to public lands...." 43 C.F.R. §1610.3-2(a). In the absence of such plans, RMPs and amendments shall "be consistent with officially approved and adopted resource related policies and programs" to the maximum extent possible and "so long as the guidance and resource

management plans are consistent with the policies, programs, and provisions of Federal laws and regulations applicable to public lands..." 43 C.F.R. §1610.3-2(b).

The BLM incorporated significant portions of the Idaho State Plan into the Idaho and Southwestern Montana PRMP, including a three tier habitat management mapping scheme. The three tiers serve as the foundation for an innovative adaptive management approach that includes habitat and population hard and soft triggers that, when hit, require shifting Important Habitat Management Area (IHMA) management to Priority Habitat Management Area (PHMA) management to maintain sufficient areas to support populations. The Idaho and Southwestern Montana PRMP also designates five GRSG Conservation Areas within the sub-region to define the geographic areas necessary for achieving and monitoring population objectives; evaluating the disturbance density and adaptive regulatory triggers; and tailor adaptive management responses.

However, the BLM has determined that several of the State's recommendations would not be consistent with the purposes, policies, and programs of federal laws applicable to public lands. Specifically, FLPMA generally requires the BLM to manage public lands for multiple-use and sustained yield, taking into account the long-term needs of future generations for renewable and non-renewable resources -- including fish and wildlife -- and to seek achievement and maintenance in perpetuity of renewable resources. See 43 U.S.C. 1732(a); 1702(c), (h); 1701(a)(8). The BLM's Special Status Species Manual sets forth BLM policy with respect to FLPMA's consideration of wildlife and fish and renewable resources. In particular, the objectives of the special status species policy are A) to conserve and/or recover ESA-listed species and the ecosystems on which they depend so that ESA protections are no longer needed for these species; and B) to initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA. See Manual No. 6840, Section .02(A)(B). Further policy is found in BLM's IM 2012-044 (Dec. 27, 2011), which initiated the "BLM National Greater Sage-Grouse Land Use Planning Strategy" and provided guidance and direction for the agency's consideration of GRSG conservation measures. The IM and the planning strategy were initiated in response to the FWS' March 2010 decision finding, in part, that existing regulatory mechanisms found in the BLM's Land Use Plans (LUPs) were inadequate to protect the species. The IM states that "the BLM needs to incorporate explicit objectives and desired habitat conditions, management actions, and area-wide use restrictions into land use plans" in order to "conserve sage-grouse and its habitat and potentially avoid an ESA listing." See IM 2012-044. In addition, the Approved RMP Amendment will be consistent with the BLM's 2004 National Sage-Grouse Habitat Conservation Strategy which calls for managing public lands in a manner that will maintain, enhance and restore sage-grouse and sagebrush habitats while continuing to provide for multiple uses of lands under BLM stewardship.

In accordance with FLPMA's direction to manage the public lands pursuant to principles of multiple use and sustained yield and the policy direction set forth in IM 2012-044 and the BLM's 2004 National Sage-Grouse Habitat Conservation Strategy, in addition to the BLM's Special Status Species Manual, the BLM's purpose for this planning effort is to identify and incorporate appropriate conservation measures in LUPs to conserve, enhance and/or restore GRSG habitat by reducing, eliminating, or minimizing threats to that habitat. The goal of the BLM's GRSG conservation strategy rangewide is to provide for the conservation of the GRSG and its habitat

and to provide the FWS with regulatory certainty that in turn will potentially preclude a determination that the species is warranted for listing.[1] To the extent a particular recommendation is inconsistent with that goal or the policies identified above, the BLM has respectfully declined to adopt it. See 43 U.S.C. 1712(a)(9); 43 U.S.C. 1610.3-2.

To ensure that we have fully responded to your concerns, the issues you identified in your consistency review are listed below, and are followed by the BLM's response. Please note that the BLM generally only responded to issues that you identified as being inconsistent with your State's (or other local and tribal) plans and not issues of disagreements with portions of the Proposed Land Use Plan Amendment (LUPA)/Final Environmental Impact Statement (FEIS). In addition, the BLM provides information to resolve several areas of disagreement and provide appropriate clarification to address concerns as we finalize the plans.

State of Idaho's Recommendations and the BLM's Responses

Issue 1: Sagebrush Focal Areas (SFAs)

Governor's Concern: *"While the Proposed Plan purports to adopt Idaho's three-tiered habitat approach (MA-2), the Proposed LUPAs actually creates a fourth habitat zone with the designation of SFAs (MA- 10). As noted above, the Governor's trigger strategy and its management responses are effective because of the three-zone approach, particularly where the IHZ can serve as a savings account in case of severe wildfires. However, the inclusion of the SFA zone adds a fourth management layer (the SFA overlay is not consistent with the CHZ), and complicates this approach."*

Governor's Recommendation: *"Provide Idaho an Exemption from the SFAs."*

BLM Response: On October 27, 2014, the USFWS provided the BLM a memorandum titled "Greater Sage-Grouse: Additional Recommendations to Refine Land Use Allocations in Highly Important Landscapes". The memorandum and associated maps provided by the USFWS identified areas that represent recognized "strongholds" for GRSG that have been noted and referenced as having the highest densities of GRSG and other criteria important for the persistence of the species. In this memorandum, FWS Director Dan Ashe specifically stated that, "Strong, durable, and meaningful protection of federally-administered lands in these areas will provide additional certainty and help obtain additional confidence for long term sage-grouse persistence."

To ensure that these areas will be managed to provide durable protection from further surface disturbance, while recognizing valid existing rights, consistent with the statement of the Director of the FWS and direction provided by the FWS in their October memorandum, the PRMP identifies a subset of the Priority Habitat Management Areas as "Sagebrush Focal Areas" (SFAs) which are a portion of the FWS identified "strongholds" administered by the BLM. The PRMP applied the following conservation measures in SFAs, all of which were analyzed in the draft EIS: recommending these areas for withdrawal from the Mining Law of 1872, subject to valid

[1] Notably, the chairs of the Sage Grouse Task Force recognized this goal in 2011 by making a commitment to develop an action plan that "prescribes near-term conservation measures, that when added to the body of past and current efforts would ensure a viable sage-grouse population in the West and preclude the listing of the species." (Mead, Hickenlooper, and Pool Letter, June 2011)

existing rights, and applying a no surface occupancy stipulation, without waiver, exception, or modification, for fluid mineral leasing.

Sagebrush Focal Area designation adds additional restrictions to a subset of PHMA and is also used for prioritizing activities during plan implementation, but does not create a fourth habitat management area in Idaho. The methodology for applying the habitat or population adaptive management triggers in PHMA and IHMA remains the same as presented in the Draft Environmental Impact Statement (DEIS). The premise of the plan is to move disturbance out of PHMA (including SFA) and IHMA and into the lower quality General Habitat Management Area (GHMA) or non-habitat.

In November 2014 the states were notified, through a conference call, of this additional recommendation for stronghold conservation by the FWS and described to states and on January 20, 2015, the BLM presented BLM's draft proposed management for these SFAs to the 11 state agencies in attendance at the Western Governors Association Sage Grouse Task Force meeting. In addition, the State, as a cooperating agency, was provided with the opportunity to review the administrative draft proposed plan in early May 2015, where these conservation measures for SFAs were outlined. Idaho BLM will continue to work with the State to further refine our approach for prioritizing the review of grazing permits/leases and the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) to better reflect the prioritization approach adopted in the Idaho State Plan for Core Habitat Zone (CHZ).

In light of the BLM's Sage-Grouse Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GRSG and its habitat so as to potentially reduce the need to list the species, the BLM finds it is essential to manage SFAs as presented in the PRMP and therefore respectfully declines to adopt this recommendation because it is not consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands.

Issue 2: Disturbance Cap

Governor's Concern: "*While ...the portion of LR-1 dealing with PHMA appear to adopt the same approach as the Governor's Plan, after carefully examining the CHZ exemption criteria, the agencies' Proposed Plan is inconsistent. The BLM's exception criteria, as expressed in LR-1, alters the Governor's Plan by requiring that the project-level disturbance cap is not exceeded within a BSU. Id. at 2-48 (See also AD-1 at FEIS 2-19, and GRSG-GEN-ST-004 at FEIS 2-59 discussing disturbance caps in this Consistency Review). By contrast, the Governor's Plan has a disturbance cap only for fluid mineral development, and does not apply this unnecessary and difficult to implement measure to transmission lines, roads, and pipelines; accordingly, AD-1 and GRSG-GEN-ST-004 are inconsistent with the Governor's Plan.*"

Governor's Recommendation: *Remove... "project-level disturbance cap..."*

BLM Response: Idaho developed a disturbance cap for oil and gas leasing based on the Wyoming DDCT strategy. Through collaboration with the state of Idaho, BLM modified the disturbance cap concept using the best available science (Knick, et al, 2013) to develop a disturbance cap strategy that would incorporate the Degradation Threats presented in Appendix G of the FEIS.

Disturbance caps were designed to provide regulatory certainty that anthropogenic disturbance could be managed to provide for the conservation of the GRSG and its habitat so as to reduce the need to list the species. The management actions in the Proposed LUPA were aimed to reduce disturbance associated with threats to GRSG habitat. "Sage-grouse are extremely sensitive to discrete disturbance (Johnson et al. 2011, Naugle et al. 2011a,b) although diffuse disturbance over broad spatial and temporal scales can have similar, but less visible effects." Only applying disturbance caps to fluid minerals would not capture the extent of anthropogenic disturbance affecting GRSG in the planning area and would not provide the regulatory certainty necessary to preclude listing.

The BLM respectfully declines to adopt this recommendation because it is not consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands; in particular, would not address the Degradation Threats (Appendix G FEIS) potentially influencing GRSG habitat into the future.

Issue 3: Net Conservation Gain Standard

Governor's Concern: *AD-3 includes the post-DEIS "net conservation gain" standard for sage-grouse, which is not found in the Governor's Plan nor the other co-Preferred Alternative.*

Governor's Recommendation: *Remove... "the undefined net conservation gain mitigation standard."*

BLM Response: The net conservation gain strategy is in response to the overall landscape-scale goal which is to enhance, conserve, and restore GRSG and its habitat. This goal is also consistent with 2006 Western Association of Fish and Wildlife Agencies GRSG Comprehensive Strategy's objective to maintain and increase where possible the present distribution and abundance of GRSG. All of the action alternatives provided management actions to meet that landscape-scale goal (PRMP GRSG Goals: Goal 1, 2, 3 and 5; Special Status Species Objectives: MA-OBJ-1, 2, and 3; HM-OBJ-1 and 2; Vegetation Management Objectives VEG-OBJ-1, 2, and 3, Wildland Fire Management Objective Fuel-OBJ - 1).

Consistent with the PRMP's goals, the intent of the Idaho and Southwestern Montana LUPA/FEIS is to provide a net conservation gain to the species. To do so, consistent with valid existing rights and applicable law, in authorizing third party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions.

This standard is consistent with the recommendation included in the GRSG rangewide Mitigation Framework: Version 1.0 published by the FWS in September 2014, which states that mitigation "be strategically designed to result in net overall positive outcomes for sage-grouse". It is also consistent with BLM Manual 6840 – Special Status Species Management, Section .02B, which states "to initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of the need for listing of these species under the ESA."

Mitigation will follow the regulations from the White House Council on Environmental Quality (40 CFR 1508.20; e.g. avoid, minimize, and compensate), hereafter referred to as the mitigation hierarchy.

The BLM respectfully declines to adopt this recommendation because, as explained above, it is not consistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands, in particular BLM's Sage-Grouse Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the SRSG and its habitat so as to potentially reduce the need to list the species.

Issue 4: Grazing Management

Governor's Concern: *"The Proposed Plan is materially inconsistent with the Governor's Plan for livestock grazing. The designation of sage-grouse "strongholds" in the Ashe Memo, that imposed designation of 3 million acres of SFAs, is the key driver for this inconsistency. See FEIS at 2-14. Along with the SFAs, the Proposed Plan imposes unnecessary grazing standards contrary to the 2010 Finding, misinterprets or disregards the Governor's adaptive management construct, and arbitrarily applies lek buffers to range improvements and infrastructure."*

Governor's Recommendation: *The plan requires "Significant changes to the livestock grazing section with the explicit recognition that improper grazing is a secondary threat."*

BLM Response:

Livestock grazing is an integral part of the BLM's multiple-use mission and is authorized by the Taylor Grazing Act (1934), the FLPMA (1976) and the Public Rangeland Improvement Act (1978). While livestock grazing is not recognized as a widespread threat to GRSG habitat, improper grazing can be a localized threat to GRSG habitats. In light of the BLM's Greater Sage-Grouse Conservation Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GRSG and its habitat so as to potentially reduce the need to list the species, the BLM finds it is essential to include these range management objectives in the PRMPs. However, in response to your concerns, the BLM will provide clarifying information on the range management objectives in the RODs to make clear that appropriately-managed livestock grazing is not a threat and may continue under the plans.

The PRMP direction to prioritize reviews of livestock grazing, as well as other vegetation treatments and management actions, to ensure consistency with land health standards and GRSG Habitat Objectives in SFAs is not meant to nor is it intended to communicate that livestock grazing is a threat in these areas. To the contrary, given the high value placed on maintaining "strong, durable, and meaningful protection" of the federally-administered lands in the SFAs, the purpose of prioritizing reviews of the status and health of rangelands in SFAs is to ensure that, where improper management is occurring, resources and assistance can be prioritized to help make progress toward meeting land health standards and objectives, consistent with the ecological potential of that site. In this way, the BLM can make prudent use of limited range management resources to protect these highly-valued habitat areas.

By ensuring that the National Environmental Policy Act (NEPA) analysis associated with land-use activities, including, but not limited to, livestock grazing permit renewals and modifications,

includes specific adaptive management thresholds and responses based on the GRSG Habitat Objectives Table, Land Health Standards (43 CFR 4180.2), and ecological site potential, the BLM will be able to make adjustments to livestock grazing when necessary to respond to rangeland conditions that have already been analyzed under NEPA. This approach provides the FWS with the certainty that the BLM will take prompt action when any range-use is not meeting or moving towards meeting, a GRSG habitat objective or land health standard.

In exercising its authority to modify terms and conditions of a permit or lease following completion of the NEPA analysis, the BLM will engage in close consultation, cooperation, and coordination with the affected lessees or permittees, the State agency managing lands or resources within the area, and the interested public. Also, please note that all applicable procedures that are required pursuant to the grazing regulations will be followed, including the right to protest and appeal.

The recommendation does not identify an inconsistency with State or local resource related plans, policies, or programs because current grazing management will not change as a result of the SFA designation. In regards to livestock grazing management, the SFAs will only be used as a prioritization mechanism for renewing grazing permits for allotments within SFAs. However, I will continue to work with the State to further refine our approach for prioritizing the review of grazing permits/leases and the processing of grazing permits/leases in Sagebrush Focal Areas (SFAs) to better reflect the prioritization approach adopted in the Idaho State Plan for CHZs.

The NEPA analysis for these renewals will include habitat thresholds; and if threshold is exceeded and livestock grazing is identified as a probable casual factor, adjustments can be made following the Adaptive Grazing Management Response described in Appendix G.

Your concern related to applying lek buffers to range improvements is discussed in the response to *Issue 5: Uniform Lek Buffers.*

Issue 5: Uniform Lek Buffers

Governor's Concern: *"Lek buffers, in the Proposed Plan are uniformly calculated at 2 miles (See FEIS App. DD at DD- 1), which is inconsistent with the Governor's Plan requiring a buffer for this type of infrastructure to be set at .6 miles See E.O. 2015-04 at (II)(c)(ii)(2); and Idaho State Bd. of Land Comm'rs, Greater Sage- Grouse Conservation Plan at section 14.1.2 (2015).*

Accordingly, application of uniform lek buffers in the GHZ is a major inconsistency with the Governor's Plan."

Governor's Recommendation: *Remove... "uniform lek buffers... ."*

BLM Response: The recommendation to revise all buffer distances does not identify an inconsistency with State or local resource related plans, policies, or programs since the buffer distances will be determined during project level implementation authorizations for consistency with GRSG conservation objectives reflecting local ecological conditions. Specifically, the PRMP's direction on United States Geological Survey (USGS) buffer recommendations will be applied to project implementation level authorizations and are not allocations. When considering projects in PHMA and GHMA within the range of distances referenced in the USGS report, it is

the BLM's intent to consider local data and regulations, including those identified in the State's plan as appropriate. The BLM will consider justifiable adjustments to decrease or increase distances from the USGS Report based on other local data, best available science, landscape features, and other existing protections.

Moreover, even if there is an identified, inconsistency with state or local resource-related plans, policies, or programs, in light of the BLM's Sage-Grouse Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GRSG and its habitat so as to potentially reduce the need to list the species, the BLM finds it is prudent to include buffers to protect leks as presented in the PRMP and that adoption of this recommendation would be inconsistent with purposes, policies, and programs of federal laws and regulations applicable to public lands.

Issue 6: Required Design Features (RDFs) in all Habitat Types
Governor's Concern: *"Significant differences between the BMPs required by the Governor's Plan and the RDFs required in the agencies' Proposed Plan. Specific RFDs either conflict directly with the Governor's Plan, or are inconsistent because such practices were intentionally omitted from the Governor's Plan."*

Governor's Recommendation: *Remove RDFs that are not contained in the Governor's plan.*

BLM Response: Required Design Features (RDFs) are required for certain activities in all GRSG habitat. BLM has discretion in the application of RDFs and Best Management Practices (BMPs) on any proposal for which BLM issues a permit. Through the NEPA analysis, it may be determined that RDFs and/or BMPs should be incorporated into the respective permit as conditions of approval in order to avoid or reduce adverse impacts.

Given the flexibility inherent in the application of RDFs, there is minimal inconsistency, if any, between the Governor's Plan and the Propose LUPA. In light of the BLM's Greater Sage-Grouse Conservation Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GSRG and its habitat so as to potentially reduce the need to list the species, the BLM finds it is essential to include RDFs for the GRSG in all habitat types. The RDFs are designed to respond to recommendations identified in the Conservation Objectives Team report and will assist in meeting the primary objective of the BLM Special Status Species policy. Not including RDFs in all habitat types where sensitive species are found would be inconsistent with the purposes, policies, and programs of federal laws and regulations applicable to public lands, in particular BLM's Sage-Grouse Strategy, its Special Status Species Policy, and its goal to provide regulatory certainty for the conservation of the GRSG and its habitat so as to potentially reduce the need to list the species; therefore, the BLM respectfully declines to adopt this recommendation in full. However, to address your concern, the BLM will add clarifying language to include state-implemented conservation measures or protections as an alternative to consider in the application of RDFs.

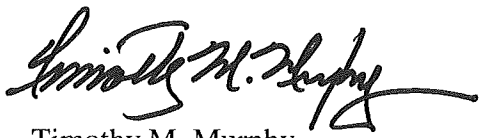
Please note that you have the opportunity to appeal this response to the Director of the BLM pursuant to 43 CFR 1610.3-2(e). Such an appeal must be filed within 30 days of your receipt of this letter, by September 8, 2015. Please submit appeals to:

BLM Washington Office
Attention: Director of the BLM
1849 C Street NW, Rm. 5665
Washington DC 20240

Thank you for your thorough, comprehensive and thoughtful consistency review. I also appreciate the hard work your staff and the various state agencies and local governments have contributed to the consistency review and BLM's Sage-grouse Planning Strategy. I look forward to continuing a productive and collaborative working relationship as we move forward to develop clarifying language where noted above and in implementing the Plans.

If you or your staff has any questions please contact Jonathan Beck, Idaho State GRSG Lead, at (208) 373-4070 or email at jmbeck@blm.gov.

Sincerely,



Timothy M. Murphy
State Director