



**United States Department of the Interior
BUREAU OF LAND MANAGEMENT**

Bishop Field Office
351 Pacu Lane Suite 100
Bishop, California 93514
www.blm.gov/ca/bishop



June 6, 2014

1610 (CA-170) P

Edward D. Koch
State Supervisor
U.S. Fish and Wildlife Service
Nevada Fish and Wildlife Office
1340 Financial Blvd; Suite 234
Reno, NV 89502

Dear Mr. ^{Ted}Koch,

The Bureau of Land Management (BLM) Bishop Field Office has been actively involved in efforts to conserve greater sage-grouse (*Centrocercus urophasianus*) populations and habitats in the Bi-State area for several decades. As you are aware, the Bishop Field Office has played a central role in the conservation and management of sage-grouse habitats and populations in the Bodie and South Mono population management units (PMUs); PMUs which today comprise the core of the Bi-State distinct population segment (DPS) of greater sage-grouse and account for an estimated 70 percent of all individuals in the DPS. The Bishop Field Office also manages habitat for the DPS in the California portions of the Pine Nut and White Mountains PMUs. In sum, the Bishop Field Office is responsible for the management of an estimated 56 percent of all BLM administered public lands currently identified as proposed critical habitat for the Bi-State DPS.

Sage-grouse conservation was a key issue during the development of the Bishop Resource Management Plan (RMP) which began implementation in 1993; and the Bishop RMP, as amended, continues to provide a comprehensive and effective regulatory framework for conserving and managing greater sage-grouse habitats on public lands administered by the Bishop Field Office today. As outlined in your Species Status Assessment for the Bi-State DPS, the Bishop RMP's "yearlong protection" provision explicitly provides that "no discretionary action that would adversely affect" habitat for the DPS may be authorized. Under this provision, the Bishop RMP also provides that existing uses and casual uses be managed to avoid adverse effects to habitat for the DPS. This land use plan guidance has, and continues to, effectively eliminate the threat of development-based habitat loss or adverse modification and effectively

provide for the implementation of proactive management to remove existing habitat-based threats to the Bi-State DPS on public lands administered by the Bishop Field Office.

It is also important to note that the conservation deference provided to greater-sage grouse habitat under the Bishop RMP is consistent with our current knowledge and understanding of the Bi-State DPS. For example, the overarching regulatory framework provided by the RMP's yearlong protection provision does not rely upon lek buffers or other habitat surrogates for its application. Instead, the yearlong protection provision is applied to all sage-grouse habitat regardless of proximity to leks. This ensures the protection and long-term conservation of seasonal habitats both within and beyond the 5.0 Km lek buffer recently recommended by Coates et al. (2013). As a result, the Bishop RMP continues to provide a higher level of regulatory assurance for the maintenance and improvement of greater sage-grouse habitat than recommended by the best available science.

The Species Status Assessment for the Bi-State DPS also summarizes key land use plan amendments and the incorporation of BLM State-level guidance specific to our sensitive species policy (BLM Manual 6840) that have further strengthened the regulatory effectiveness of the Bishop RMP. Specifically, in July 2000 the Bishop RMP was amended to incorporate the Central California Standards for Rangeland Health and Guidelines for Livestock Grazing Management and in January 2005 the RMP was amended to incorporate the Bishop Fire Management Plan. These two land use plan amendments provide additional guidance to specifically address the amelioration of threats related to permitted livestock grazing and wildfire.

In addition to providing a robust regulatory framework for the conservation and management of greater sage-grouse habitats on public lands administered by the Bishop Field Office, the Bishop RMP also fully supports the implementation of the conservation efforts formalized in the Bi-State Action Plan. The development of cooperative wildlife habitat management plans was explicitly identified as a support need in the Bishop RMP. The recently refined Bi-State Action Plan fulfills this support need and provides science-based activity-level plan guidance that will ensure the successful implementation of "on-the-ground" sage-grouse habitat restoration projects for many years to come.

In closing, the Bishop RMP continues to provide a comprehensive and effective regulatory framework for conserving and managing greater sage-grouse habitats on public lands administered by the Bishop Field Office. The Bishop RMP has a proven 20-year track record of effectively conserving sage-grouse habitat by consistently avoiding development-based habitat loss or adverse modification in the Bi-State area. The RMP also has a proven 20-year track record of providing for the implementation of proactive sage-grouse habitat management and restoration actions to ameliorate existing habitat based-threats to the Bi-State DPS. The Bishop RMP, when combined with the recently refined Bi-State Action Plan, provides a high level of both regulatory certainty and project implementation certainty that will result in significant conservation benefits to greater sage-grouse populations and habitats in the Bi-State area. I look forward to working with you and our other cooperators as we continue our cooperative effort to conserve this iconic species and the ecosystems upon which it depends.

If you have any questions or require further information regarding the regulatory framework that the Bishop RMP, as amended, provides for the long-term conservation and management of greater sage-grouse habitat on public lands administered by the Bishop Field Office in the Bi-State area, please contact me at 760-872-5011 or via email at snelson@blm.gov.

Sincerely,

A handwritten signature in blue ink that reads "Steven L. Nelson".

Steven L. Nelson
Bishop Field Manager

cc:

Tony Wasley, Nevada Division of Wildlife Director, Co-Chair Bi-State EOC
Bill Dunkelberger, Humboldt-Toiyabe National Forest Supervisor, Co-Chair Bi-State EOC