

# Western Values Project

	WEA COMPLAINT/ASK	DOI RESPONSE/RECOMMENDATION
1.	Overly expansive and burdensome lek and noise buffers.	<ul style="list-style-type: none"> <li>• Reevaluate lek buffers from grouse plans and consider “adjusting the size of the buffer. . . .” DOI Report App. A at 16.</li> <li>• Develop new process to “streamline the process [of adjusting lek buffers] using local information.” <i>Id.</i></li> </ul>
2.	Inconsistent and overly burdensome density and disturbance caps.	<ul style="list-style-type: none"> <li>• Resolving any inconsistencies by developing a new “density and disturbance process that recognizes State-specific issues and needed flexibilities.” DOI Report App. A at 2.</li> </ul>
3.	Inconsistent and overly burdensome oil and gas lease stipulations.	<ul style="list-style-type: none"> <li>• Identify “opportunities to provide additional waivers, modifications, and exceptions” to oil and gas lease stipulations established by the grouse plans. DOI Report at 5.</li> <li>• Consider changing oil and gas lease stipulations for General Habitat Management Areas (GHMAs). DOI Report App. A at 1.</li> </ul>
4.	BLM’s unlawful ceding of authority to the U.S. Fish & Wildlife Authority for approval of exceptions, waivers and modification (WEMs) to oil and gas lease stipulations.	<ul style="list-style-type: none"> <li>• Eliminate “U.S. Fish and Wildlife Service (FWS) role in approving WEMs.” DOI Report App. A at 1.</li> </ul>
5.	Imposition of unlawful and overly broad compensatory mitigation and net conservation gain requirements.	<ul style="list-style-type: none"> <li>• Consider adopting state mitigation standards and procedures to replace mitigation requirements, including compensatory mitigation and net conservation gain standard, from the grouse plans. DOI Report App. A at 3.</li> </ul>
6.	Undue leasing prohibitions and restrictions.	<ul style="list-style-type: none"> <li>• See DOI Response to 3.</li> <li>• Instructs BLM staff to lease in all forms of grouse habitat and consider rescinding 2016 BLM instruction memorandum that requires the “prioritization” of leasing outside of grouse habitats. DOI Report App. A at 2.</li> </ul>
7.	Arbitrary and unduly burdensome “Required Design Features” (RDFs).	<ul style="list-style-type: none"> <li>• Issue new guidance allowing BLM to either not impose RDFs or ignore RDFs from grouse plans in favor of “State RDFs.” DOI Report App. A at 15.</li> </ul>

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8.	Unsupported and overly broad designations of Priority Habitat Management Areas (PHMAs).	<ul style="list-style-type: none"> <li>• Develop a new process for adjusting habitat designation boundaries “without a plan amendment” (i.e., without any public review or input). DOI Report App. A at 17.</li> </ul>
9.	Arbitrary exemptions for renewable transmission projects (e.g., surface disturbance cap exemption counted against oil and gas development cap).	<ul style="list-style-type: none"> <li>• See DOI Response to 2.</li> </ul>
10.	Rescind BLM’s 2016 Greater Sage-Grouse Instruction Memoranda.	<ul style="list-style-type: none"> <li>• Rescind 2016 BLM instruction memorandum that requires the “prioritization” of leasing outside of grouse habitats. DOI Report App. A at 2.</li> </ul>
11.	Issue Instruction Memorandum to clarify and define “valid existing rights.”	<ul style="list-style-type: none"> <li>• Issue clarification “so there is a clear and consistent understanding of application of plan actions to valid existing rights and existing authorizations.” DOI Report App. A at 13.</li> </ul>
12.	Review WEA’s 2015 Data Quality Act Challenges “to identify key scientific and data flaws that need to be addressed and corrected. . . .”	<ul style="list-style-type: none"> <li>• Review the science underlying key components of the grouse plans, including for density and disturbance caps, habitat objectives, lek buffers and habitat designations. DOI Report App. A at 2, 7, 16 &amp; 18.</li> <li>• Places “locally collected partner information” on equal footing with “peer-reviewed journals” and “agency data.” DOI Report at 12.</li> <li>• Emphasizes “the need for locally relevant science and data to inform implementation of management actions.” <i>Id.</i></li> </ul>
13.	Revise sage-grouse habitat maps and habitat designations.	<ul style="list-style-type: none"> <li>• Consider eliminating Sagebrush Focal Areas, which are the most important habitat types for sage-grouse designated by the grouse plans. DOI Report App. A at 17.</li> <li>• Develop a new process for adjusting habitat designation boundaries “without a plan amendment” (i.e., without any public review or input). <i>Id.</i></li> <li>• Consider eliminating all GHMAs in Utah. DOI Report App. A at 18.</li> </ul>