

December 18, 2010

Mark Thonhoff
Bureau of Land Management
Pinedale Field Office
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RE: Adaptive Management of Monitoring Comment

Mr. Thonhoff,

At this time the elimination of the three matrix line items which you are proposing – one line each for pronghorn, mule deer and sage grouse have merit.

However, other important monitoring plan change recommendations which were proffered by the COOP review do not appear to be incorporated in your current efforts to edit the matrix. We ask that all COOP recommendations be freshly reconsidered and addressed as appropriate.

To give one example, we agree with the COOP that the decline in numbers criteria of the ROD seems to be susceptible to multiple interpretations and should, if not must, be made plain. This point was raised by the COOP review reports for mule deer and sage grouse, which respectively stated:

Criterion one (15% decline in numbers) should be defined more clearly and its logic should be examined. This criterion treats a 15% annual decline and a 15% cumulative decline in the same manner. Obviously, these could imply very different population dynamics.

Moreover, the change requiring mitigation does not have a temporal component. Is the 30% decline calculated on a per year basis or is it cumulative over several years? If the change is calculated over a single year then conceivably 29% of leks could be lost each year until no leks were left and mitigation would never be invoked. If the change is calculated over some period of years then that temporal span should be defined.

To avoid future wrangling over the meaning of the ROD, please consider rewording and/or clarifying the decline in number criteria for all appropriate species.

Thank you for the opportunity to comment.

Susan Kramer
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