

Conversation Contents

Draft Response to Sec Order 3349

Attachments:

/50. Draft Response to Sec Order 3349/1.1 Briefing Memo to AS-LM on SO 3349 kk st edits.docx

"Tryon, Steve" <stryon@blm.gov>

From: "Tryon, Steve" <stryon@blm.gov>
Sent: Fri Apr 07 2017 06:56:28 GMT-0600 (MDT)
To: Kristin Bail <kbail@blm.gov>
CC: Karen Kelleher <kkelleh@blm.gov>, Leah Baker <lbaker@blm.gov>, Deborah Mead <dmead@blm.gov>, Kit Muller <kmuller@blm.gov>, Thomas Bartholomew <tbarthol@blm.gov>
Subject: Draft Response to Sec Order 3349
Attachments: Briefing Memo to AS-LM on SO 3349 kk st edits.docx

Morning, Kristin,

Here is a soft copy of our draft response to SO 3349, after edits by KK and myself.

I'll bring a hard copy to you in a minute, prior to our 0900 DCs conf call.

n.b., We have a meeting at 1300 with 300, 400, and SOL on this same subject.

st

Steve Tryon
Deputy Assistant Director, Resources and Planning
Bureau of Land Management
1849 C Street, NW
Room 5654
Washington, DC 20240
202-208-4896

"Mead, Deborah" <dmead@blm.gov>

From: "Mead, Deborah" <dmead@blm.gov>
Sent: Fri Apr 07 2017 08:45:30 GMT-0600 (MDT)
To: "Tryon, Steve" <stryon@blm.gov>
Kristin Bail <kbail@blm.gov>, Karen Kelleher <kkelleh@blm.gov>,
CC: Leah Baker <lbaker@blm.gov>, Kit Muller <kmuller@blm.gov>,
Thomas Bartholomew <tbarthol@blm.gov>
Subject: Re: Draft Response to Sec Order 3349

Karen, Steve,

Looks good; but I found one typo -- page2, #2 under **BLM MITIGATION ACTIONS**, end of the paragraph. I think "... public land used..." should be "...public land users..."

Also, here is some proposed text to address Robin's comment that could be added to the end of the last paragraph under **MITIGATION**, on page 2.

(b) (5)



Deblyn

Deborah (Deblyn) Mead
National Mitigation Coordinator
Bureau of Land Management
20 M Street
Washington, DC 20003
Phone: 202.912.7542
Mobile: 202.494.7865
Email: dmead@blm.gov

On Fri, Apr 7, 2017 at 8:56 AM, Tryon, Steve <stryon@blm.gov> wrote:

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Bureau of Land Management
1849 C Street, NW
Room 5654
Washington, DC 20240
202-208-4896

"Kelleher, Karen" <kkelleh@blm.gov>

From: "Kelleher, Karen" <kkelleh@blm.gov>
Sent: Fri Apr 07 2017 09:18:29 GMT-0600 (MDT)
To: "Bail, Kristin" <kbail@blm.gov>
Subject: Fwd: Draft Response to Sec Order 3349

----- Forwarded message -----

From: **Mead, Deborah** <dmead@blm.gov>

Date: Fri, Apr 7, 2017 at 10:45 AM

Subject: Re: Draft Response to Sec Order 3349

To: "Tryon, Steve" <stryon@blm.gov>

Cc: Kristin Bail <kbail@blm.gov>, Karen Kelleher <kkelleh@blm.gov>, Leah Baker <lbaker@blm.gov>, Kit Muller <kmuller@blm.gov>, Thomas Bartholomew <tbarthol@blm.gov>

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Steve Tryon
Deputy Assistant Director, Resources and Planning
Bureau of Land Management
1849 C Street, NW
Room 5654
Washington, DC 20240
202-208-4896

--

Karen Kelleher

Deputy Assistant Director - Resources and Planning

Main Interior room 5644

kkelleh@blm.gov

202-208-4896

"Mead, Deborah" <dmead@blm.gov>

From: "Mead, Deborah" <dmead@blm.gov>
Sent: Fri Apr 07 2017 11:51:13 GMT-0600 (MDT)
To: "Tryon, Steve" <stryon@blm.gov>, Karen Kelleher <kkelleh@blm.gov>
CC: McKinley Ben Miller <mbmiller@blm.gov>
Subject: Re: Draft Response to Sec Order 3349

I just heard back from Theresa Alexander on Clean Air Act requirements. We can add the following text to the footnote on page 2 of the SO 3349 memo (add before the FLPMA reference).

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Deborah (Deblyn) Mead
National Mitigation Coordinator
Bureau of Land Management
20 M Street
Washington, DC 20003
Phone: 202.912.7542
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Steve Tryon
Deputy Assistant Director, Resources and Planning
Bureau of Land Management

1849 C Street, NW
Room 5654
Washington, DC 20240
202-208-4896

INFORMATION/BRIEFING MEMORANDUM
FOR THE ASSISTANT SECRETARY – LAND AND MINERALS MANAGEMENT

DATE: April 12, 2017

FROM: Michael Nedd, Acting Director – Bureau of Land Management

SUBJECT: Implementation of Secretarial Order 3349, Section 5

This ~~purpose of this~~ memorandum responds to questions posed in ~~is to implement~~ sections 5(a)(i) and 5(b)(i) ~~and (c)(i)~~ of Secretarial Order 3349, “American Energy Independence,” which requests summary information about “actions” taken by the BLM in the areas of mitigation and climate change. The BLM has interpreted “actions,” as described in SO 3349 to include: (1) new regulations or amendments to existing regulations, (2) new or revised BLM Manual Sections, (3) new or revised handbooks, (4) Instruction Memoranda, (5) Information Bulletins, and (6) other policy and guidance documents that include direction on mitigation and climate change.

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MITIGATION

BLM has been using mitigation to address impacts to a wide variety of resources and land uses across the landscape for decades. ~~In accordance with~~ As required under the National Environmental Policy Act (NEPA), the BLM routinely evaluates mitigation measures in its Environmental Impact Statements and Environment Assessments on land use plans and specific projects. While avoidance and minimization are most commonly used, compensatory mitigation is also used, particularly with regards to residual impacts to threatened and endangered species, cultural resources, air and water. (b) (5)

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~~Most of these mitigation provisions are~~ Avoidance and minimization measures that are often referred to as lease stipulations, permit conditions of approval, best management practices, or

reclamation measures; they may also be built into the proposed action as design features to avoid known sensitive resources. Avoidance, minimization, and sometimes compensation are included as design features in proposed projects. Mitigation, including compensation, may be necessary or even required by law under certain conditions. (b) (5)

[Redacted]

The Permian Basin Agreement is an example of a voluntary program in which a company may choose to use the Agreement procedures, contributing the cost of the required archaeological survey (required under Section 106 of the NHPA) into a mitigation pool. The pooled fund allows for much more effective management of the area's archaeological resources and provides industry more predictability and control over schedules and budgets needed to operate efficiently.

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Use of mitigation in appropriate circumstances may also increase the defensibility of BLM's decisions. For example, in 2008, when BLM authorized natural gas development in the Pinedale Anticline in western Wyoming, that record of decision was challenged on the grounds that it violated FLPMA's prohibition on preventing unnecessary or undue degradation. The D.C. Circuit, however, found that BLM's authorization complied with FLPMA, citing with approval BLM's reliance on mitigation measures to reduce project impacts (*Theodore Roosevelt Conservation Partnership v. Salazar*, 661 F.3d 66; 398 U.S. App. D.C. 199 (2011).

BLM began working on formal mitigation policy in the early 2000s to provide clarity and guidance for the field and increase consistency in the implementation of mitigation, in particular, identifying, considering, and, as appropriate, requiring mitigation, to address impacts to resources from public land uses.

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BLM MITIGATION ACTIONS

To implement Secretarial Order 3349, The Bureau of Land Management (BLM) provides the following list of all actions it has adopted or is in the process of developing the following list of actions relating to, (1) Secretarial Order 3330, dated October 31, 2013, "Improving Mitigation Policies and Practices of the Department of the Interior;" and the associated report dated April

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2014, "A Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior;" and (2) the Presidential Memorandum dated November 3, 2015, "Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment."

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1. **BLM Information Bulletin No. 2017-015, Availability of Model Compensatory Mitigation MOU** (December 2016). The IB announces the availability of a model memorandum of understanding (MOU) for use by the BLM State Offices when collaborating with state governments regarding State-based compensatory mitigation programs for the greater sage-grouse or its habitat. This model provides language that makes the strongest commitment the BLM can make within our legal constraints to coordinate our project review processes with the states' compensatory mitigation programs. The model MOU can be adapted for other resources and circumstances where state compensatory mitigation programs may assist the BLM in achieving its mission.
2. **BLM Mitigation Manual, MS-1794** (December 2016). This manual section and the Mitigation Handbook, H-1794-1 (listed below), were issued under **BLM Instruction Memorandum No. 2017-021**. This policy includes principles for mitigation that require, "effective mitigation is durable, defined by outcomes, implemented and monitored for effectiveness, considered within an adaptive management framework, reported upon, managed by a responsible party, guided by the best available science, and developed through effective, early, and frequent communication with the public land used, cooperating agencies, and other stakeholders, including the public."
3. **BLM Mitigation Handbook, H-1794-1** (December 2016). Description included above under MS-1794.
4. **BLM New Mexico Instruction Memorandum No. NMF010-2016-004, Bureau of Land Management (BLM) Sensitive Species – Brack's Cactus Management** (September 7, 2016). This State Office issued IM provides management guidance to conserve habitat and protect Brack's cactus, a BLM Sensitive Species and a species included on the State of New Mexico list of endangered plant species, from ground-disturbing projects by (1) requiring surveys to identify Brack's cactus locations; and (2) implementing management guidance to mitigate impacts to Brack's cactus by avoiding and minimizing impacts, and then compensating for impacts that cannot be avoided.
5. **BLM California Instruction Memorandum No. CA-2015-009 - Renewal of IM Implementing Provisions within the Consolidated Appropriations Act, 2012 (Public Law 112-74) Related to Livestock Grazing Authorizations in the California Desert Conservation Area** (December 17, 2014). This IM reiterates and provides direction on implementing the livestock grazing provisions in P.L. 112-74, which states that BLM shall accept the donation of valid existing grazing allotments and make the land available for mitigation by allocating the forage to wildlife use consistent with any applicable Habitat Conservation Plan, Endangered Species Act section 10 permit, or biological opinion.
6. **Multi-Scale Guidance for Identifying Shared Visual Resources and Mitigation Adverse Impacts through a Collective and Collaborative Process** (~~January 2017~~in progress). The National Park Service and the BLM are co-leading an interagency group to advance a coordinated effort to encourage thoughtful management of shared scenic resources, which encompass both natural and cultural settings. As part of its effort, the team

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developed the visual resources guidance called for under #15 of the “[Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior](#),” report. The guidance underwent SOL review but has not been finalized. The NPS and BLM agreed to wait for the new Administration to finalize the guidance. Once completed, the participating agencies will need to determine the extent to which they integrate the guidance into their procedures. The guidance does not place requirements on agencies instead it encourages them to work cooperatively with states, industry, private property owners and stakeholders to identify upfront important scenic views and visual resources and to forge a collective management strategy for their stewardship into the future. The guidance is wholly voluntary and does not “burden” energy development but rather seeks to resolve potential conflicts early in decision making processes.

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Prior to issuance of Secretarial Order 3330 and the 2015 Presidential Memorandum, the BLM took the following actions of note related to mitigation:

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1. **BLM Information Memorandum No. 2013-142, *Interim Policy, Draft Regional Mitigation Manual Section (MS-1794)*** (June 2013). This interim policy directed resource programs to move from case-by-case application of mitigation to a regional approach that involves anticipating future mitigation needs and strategically identifies mitigation sites and measures that can help the BLM achieve its resource objectives while improving permitting efficiencies and providing greater certainty to permit applicants, partners, stakeholders, and the public. The 2013 interim policy covered all resource programs and was the precursor to the current Mitigation Policy.
2. **BLM Arizona Instruction Memorandum No. AZ-2012-031, *Desert Tortoise Conservation Agreement Implementation*** (June 2012). The ~~Arizona~~ State Office issued IM articulates mitigation policy, including off-site compensation for the desert tortoise and its habitat on public lands managed by the Bureau of Land Management (BLM) in Arizona, (b) (5).
3. **BLM *Special Status Species Manual* (M 6840)** (December 2008). This Manual identifies and interprets BLM’s responsibilities under the Endangered Species Act and mentions off-site compensatory mitigation as a means to further the conservation of federally-listed species.
4. **BLM Instruction Memorandum No. 2009-011, *Assessment and Mitigation of Potential Impacts to Paleontological Resources*** (October 10, 2008). The IM provides guidelines for assessing potential impacts to paleontological resources in order to determine mitigation steps for federal actions on public lands under the Federal Land Policy and Management Act and the National Environmental Policy Act. These guidelines also apply where a federal action impacts split-estate lands. It also provides field survey and monitoring procedures to help minimize impacts to paleontological resources determined to be significant that are expected to be adversely affected by a federal action.
5. **BLM Instruction Memorandum No. 2008-204, *Offsite Mitigation*** (September 30, 2008). This instruction memorandum outlines policy for the use of offsite mitigation for authorizations issued by the Bureau of Land Management and replaced IM WO-2005-069 *Interim Offsite Compensatory Mitigation for Oil, Gas, Geothermal and Energy Rights-of-way Authorizations* (February 1, 2005).
6. **BLM *National Environmental Policy Act Handbook, H-1790-1*** (January 2008). Following the Council of Environmental Quality’s regulations at 40 CFR 1508.20, this Handbook defines mitigation and states that mitigation can be used to reduce the effects of an action below the threshold of significance thereby avoiding the need to prepare an EIS. It also requires description of any residual

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effects that remain after mitigation measures have been applied, requires that adopted mitigation measures be described in decision documentation, and requires monitoring to ensure implementation of adopted measures.

7. **BLM Instruction Memorandum No. 2008-050 – Migratory Bird Treaty Act – Interim Management Guidance** (December 2007). This Memorandum provides direction to avoid, reduce or mitigate adverse impacts to the habitats of migratory bird species of conservation concern to the extent feasible, and in a manner consistent with regional or statewide bird conservation priorities handbook.
8. **BLM's land use planning regulations, 43 CFR 1600 and the BLM's Land Use Planning Handbook H-1601-1 (2005)** - (b) (5)
9. **Protecting Cultural Resources Manual (MS-8140)** (December 2004). This Manual provides general guidance for protecting cultural resources from inadvertent adverse effects associated with BLM land use decisions, pursuant to the National Historic Preservation Act, the National Environmental Policy Act, Executive Order 11593, and the National Programmatic Agreement regarding the manner in which the BLM will meet its responsibilities under the National Historic Preservation Act.
10. **BLM's hardrock mining regulations, 43 CFR 3809** - Among the general performance standards for surface management within a mining plan of operations is the requirement to "take mitigation measures specified by BLM to protect public lands" (43 CFR 3809.420(a)(4)).
11. **BLM's FLPMA right of way regulations, 43 CFR 2800** (b) (5)

CLIMATE CHANGE

The BLM has (b) (5) -considered climate change, its effects on public lands resources and public land users, and how BLM decisions contribute to climate change for many years, primarily through the land use planning and NEPA analysis process. BLM began working on formal climate change policy in 2008 through issuance of an Instruction Memorandum (IM), transmitting draft guidance on incorporating climate change into land use planning and NEPA documents. (b) (5)

-In 2010, the Council on Environmental Quality (CEQ) released a document entitled "Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emission" for review by the public and agencies. (b) (5)

-The CEQ issued revised draft guidance in December of 2014 for review and comment. (b) (5)

(b) (5) [redacted] -Final CEQ guidance was issued in August of 2016 (b) (5) [redacted]

BLM CLIMATE CHANGE ACTIONS

To implement Secretarial Order 3349, the Bureau of Land Management (BLM) provides the following list of all actions it has adopted or is in the process of developing the following list of actions relating to the guidance identified in Secretarial Order 3349, and in addition (1)

(b) (5) [redacted]

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(b) (4) [redacted]

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1. **BLM Instructional Memorandum No. 2017-003, *The Council on Environmental Quality Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews*** (December 2016). The IM transmits CEQ guidance on considering climate change in NEPA analysis. It also provides specific step-down guidance for how to calculate the “downstream” or indirect greenhouse gas emissions associated with fossil fuel actions (coal, oil, and gas), when production estimates are reasonably foreseeable.

2. ~~**BLM Instructional Memorandum, *Considering Climate Change in NEPA Documents***~~ (never issued). This draft policy was intended to provide BLM specific step-down guidance from various draft iterations of CEQ guidance and Department of the Interior Office of Environmental Policy and Compliance (OEPC) guidance on considering climate change in NEPA analysis. (b) (5) [redacted]

Prior to issuance (b) (5) [redacted]

(b) (5)

the BLM took the following actions of note related to climate change:

(b) (5)

1. **BLM New Mexico Instructional Memorandum No. IM-NM-2013-022, *Availability of Updated Air Resources Technical Report (ARTR); Use of Environmental Assessment (EA) Template Air Quality and Climate Change Language for Applications for Permit to Drill (APDs) and Lease Sales*** (June 2013). The IM instructed BLM New Mexico District Office and Field Offices to use the latest version of the BLM New Mexico Air Resources Technical Report, and provided template language for use in NEPA environmental analysis documents, to address air quality and climate change impacts.
2. **BLM Oregon/Washington Instructional Memorandum No. IM-OR-2010-012, *Analysis of Greenhouse Gas Emissions and Consideration of Climate Change in National Environmental Policy Act Documents*** (January 2010). The IM provided BLM Oregon/Washington State Office guidance on analyzing greenhouse gas emissions and addressing changing climate conditions in NEPA documents. The IM expired in October 2011. (b) (5)
3. **BLM Instructional Memorandum No. 2008-171, *Guidance on Incorporating Climate Change into Planning and NEPA Documents*** (August 2008). The IM transmitted draft guidance on BLM offices to follow to adequately incorporate climate change considerations into the Land Use Planning/NEPA analysis process. (b) (5)

BLM has also developed tools to assist in assessing emissions, including the following:

(b) (5)

1. **Tool: BLM Emissions Inventory Toolkit.** The BLM Washington Office is developing an Emissions Inventory Toolkit, scheduled for completion in September 2017, which will be a consolidation and enhancement of existing emissions inventory tools. The Emissions Inventory Toolkit will be a web-based application that will provide a consistent BLM methodology for calculating emissions from criteria pollutants, hazardous air pollutants and greenhouse gases. It also will have the capability to store emissions inventories from various projects so that cumulative emissions can be assessed, and has a modeling component that can produce results for near-field impacts analysis. The toolkit will include a library where documents and reports can be stored. The toolkit will be useful in streamlining air analyses for planning activities including for NEPA and General

Conformity requirements and in showing whether air quality standards or management goals are currently being met.

2. **Tool: BLM Colorado Emissions Inventory Calculator.** The BLM Colorado emissions calculator estimates air resources emissions, including greenhouse gases, with the goal of providing technical consistency and efficiency in gathering data on emissions-generating activities for use in NEPA analyses. The ability of the tool to gather information from external sources to be compiled for analysis has led to faster processing times for projects requiring air analysis. This tool is being consolidated into the BLM Emissions Inventory Toolkit mentioned above.
3. **Tools: BLM Oregon/Washington carbon calculators.** Four of the BLM western Oregon Districts have developed carbon storage and greenhouse gas calculators to support environmental analyses, primarily timber sales. Key features of these tools will be rolled into the BLM Emissions Inventory Toolkit mentioned above.
4. **Tools: BLM New Mexico emissions calculators.** In BLM New Mexico, three calculators have been available to estimate air resources emissions, including greenhouse gases, for use in NEPA environmental analysis documents associated with applications for permit to drill and oil and gas lease sales. Key features of these tools will be ~~rolled~~ incorporated into the BLM Emissions Inventory Toolkit mentioned above.
5. **Report: Greenhouse Gas & Climate Change Report.** The Greenhouse Gas & Climate Change Report provides a database and air emissions tool that will calculate greenhouse gas emissions for the base year database and the out-year projections for 10 western states. The report include emissions associated with production and consumption activities, separated by Federal and non-Federal lands for coal, oil, natural gas, and natural gas liquids, for incorporation by reference into NEPA analyses. The reports will be housed in the library section of the BLM Emissions Inventory Toolkit mentioned above.

In addition to the policies and tools listed above, the BLM has taken a wide variety of actions over the years to assess and address the risks associated with wildland fire, invasive plants and animals, drought and other environmental changes that may be caused, in part, by climate change. Examples of such adaptation actions include, helping develop and implement the National Cohesive Wildland Fire Management Strategy, participating in the work of the National Invasive Species Council, working with the State of Montana and the National Drought Resilience Partnership to build drought resilience in the Upper Missouri River Basin, synthesizing and considering ecoregional information related to impacts of climate change on resources BLM manages in land use planning, and partnering with individual livestock permittees to help them adapt to their operations to be more resilient to wildland fire and drought.

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(b) (5) [Redacted]

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NEXT STEPS

In responding to SO 3349, the BLM has focused primarily on policies that have been adopted since the documents specified in the Order. The BLM has applied mitigation and considered climate change in its decision-making and use authorizations for years, encompassing thousands of individual actions and decisions. Several laws under which BLM manages require consideration of mitigation and courts have also weighed in on the need for the BLM to consider both mitigation and climate change, including greenhouse gas emissions, for the BLM and many other Federal agencies. (b) (5)

BLM recommends that consideration be given to reconsideration or modification of these policies, rather than outright rescission.

(b) (5) [Redacted]

In general, BLM believes the primary issues

of concern relate to compensation and recommends that reconsideration of its mitigation policies focus on its approach to compensation in future land use plans and future projects, such as which resources should be compensated for and what standard(s) should be applied when compensatory mitigation is appropriate (e.g., no net loss, net conservation gain).

(b) (5) [REDACTED] BLM requests clarification on whether reconsideration should focus on analyzing the impacts of authorization on climate change (e.g., greenhouse gases) or should also include reconsideration of BLM's adaptation actions (e.g., drought, invasive species, fire and other changes that may be related to climate change). In general, BLM believes there is broad support for BLM's adaptation related actions and recommends that reconsideration focus on consideration of GHG, such as evaluation of downstream effects.