



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

APR 25 2016

OFFICE OF THE DEPUTY ASSISTANT SECRETARY

SAF/IEI
1665 Air Force Pentagon
Washington, DC 20330-1665

The Honorable Adam Smith
Ranking Member
Committee on Armed Services
United States House of Representatives
Washington, DC 20515

Dear Representative Smith:

Thank you for the letter co-signed by you and Representative Grijalva dated 23 March 2016 regarding the potential effects on Air Force operations of placing the Greater Sage Grouse on the Endangered Species List. Specific answers to the four questions asked in the letter are attached.

The Air Force has reviewed the resource management plans developed by the Bureau of Land Management, U.S. Forest Service, and the states in advance of the U.S. Fish & Wildlife Service's (USFWS) decision not to list the species. These reviews determined that the management practices described would not affect Air Force training, operations, or readiness to any significant degree. However, the forecast of no adverse impact could change with the potential implementation of new management practices. The Air Force will continue to monitor closely the status and issues associated with the Greater Sage Grouse.

On behalf of the Secretary of the Air Force, thank you for your continued contributions to our Nation's defense and the United States Air Force.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer L. Miller".

JENNIFER L. MILLER
Deputy Assistant Secretary of the Air Force
(Installations)

Attachments:
Sage Grouse Congressional Questions and Answers

1) How would the BLM or USFS Resource Management Plans, and other requirements for protection of the greater sage-grouse and its habitat, affect military training, operations, or readiness?

The specific operational impacts of the Greater Sage Grouse being listed under the ESA are dependent on the management practices and associated restrictions that would be put in place for Critical Habitat designated by the FWS. We have previously reviewed relevant portions of the resource management plans adopted by the Bureau of Land Management (BLM), US Forest Service (USFS), and the states in advance of the U.S. Fish & Wildlife Service's (FWS) decision not to list the species. These reviews determined that the management practices described at that time would not affect military training, operations, or readiness to any significant degree.

2) If the greater-sage grouse were to be listed as threatened or endangered under the Endangered Species Act, what affect would that decision have on military training, operations, or readiness?

The Greater Sage Grouse distribution consists of 480,000 square miles of historic habitat in the western United States and Canada, Figure 1. The distribution overlays multiple Air Force installations and operational ranges listed by state in Table 1. The habitat also occurs under multiple sections of Air Force Special Use Airspace used for testing and training throughout the west.

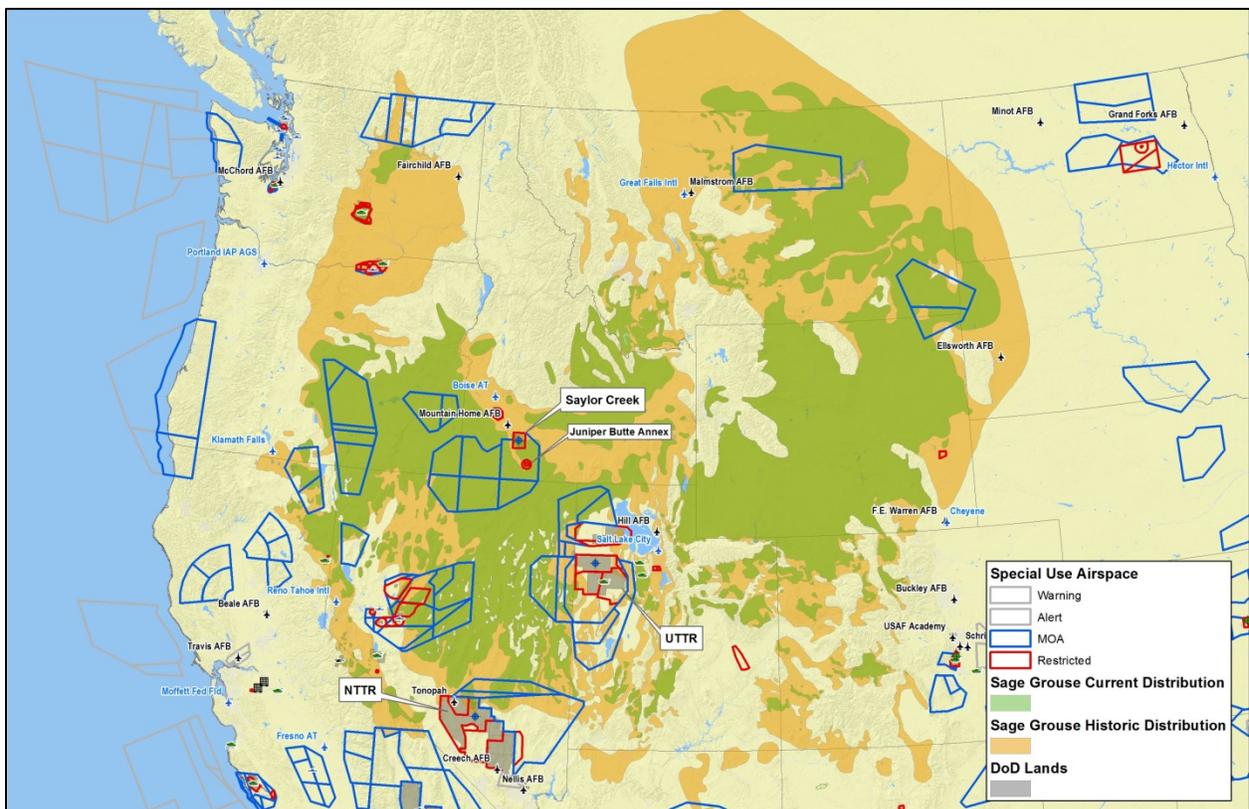


Figure 1: Greater Sage Grouse Distribution

The impacts on Air Force military training and testing are expected to be manageable if the Greater Sage Grouse is added to the Endangered Species List and if Air Force lands are exempted from Critical Habitat designation. The Air Force has been making investments in maintaining Greater Sage Grouse habitat as

documented in each installation’s Integrated Natural Resource Management Plan (INRMP). These INRMPs have been developed with and approved by the Fish and Wildlife Service (FWS) and State fish and game agencies. Because these INRMPs are protective of the Greater Sage Grouse as a candidate species, the Air Force anticipates an exemption from Critical Habitat designation. Current management activities include fire control and invasive species (cheatgrass) management at an approximate annual cost of \$200K.

Idaho	Boise Air Terminal ANGB Mountain Home AFB Saylor Creek Range and Juniper Butte Annex
Montana	Great Falls Intl ANGB Malmstrom AFB
Nevada	Reno - Tahoe Intl ANGB Tonopah Air Field Nevada Test and Training Range (NTTR)
Oregon	Klamath Falls ANGB
South Dakota	Ellsworth AFB
Utah	Hill AFB Salt Lake City IAP ANGB Utah Test and Training Range (UTTR)
Washington	Fairchild AFB

Table 1: USAF Installations within Sage Grouse Distribution

While it is not expected, the level of impact would increase if the Greater Sage Grouse is listed for protection under the Endangered Species Act and Air Force lands are not exempted from Critical Habitat designation. If the Greater Sage Grouse is listed as an endangered species, Section 7 consultations would be required for any development activities on Air Force lands impacted, and as a result of consultation, mitigation measures may be required at a cost to the Air Force. We project annual species investment could rise to ~\$500K per year. Additionally, these consultations could increase the total amount of time required for development, thereby reducing both the responsiveness and flexibility of the Air Force to meet new requirements.

3.) How do the Integrated Natural Resources Management Plans (INRMPs) allow for both training and wildlife conservation at U.S. military installations while not adversely affecting military training, operations, or readiness?

INRMPs are developed in coordination with the U.S. Fish and Wildlife Service (USFWS), the appropriate State fish and wildlife management agency(s), and the installation in accordance with the ESA and provide a plan for military operations in an environment that may include endangered species while complying with applicable Federal and State natural resources laws and regulations. As such, the INRMP is the principal tool the Air Force uses to manage military installation natural resources in a manner that accommodates the mission. INRMPs specifically ensure that activities such as habitat management, species protection, and outdoor recreation are conducted in a manner that is compatible with the installation’s military operations. INRMPs may also document mitigation activities that compensate for

potential impacts on a protected species. The INRMP facilitates the maintenance of a healthy ecosystem, which supports a realistic landscape for military training, and ensures that they are not mutually exclusive. In fact, a healthy ecosystem is more durable to the adverse effects that may occur due to military mission activities.

4) What statutory authorities does the DoD have to address potential conflicts that may arise in the future to ensure that military training, operations, and readiness will not be adversely affected? Does the Department believe these authorities are sufficient to protect the interests of the DoD without additional legislation from Congress?

DoD relies primarily on the ESA Section 4(a)(3)(B)(i) which provides an exemption from designation of critical habitat on military lands covered by an INRMP after a finding that the INRMP provides a benefit to the species concerned. DoD has also relied upon Section 4(b)(2) which allows the USFWS or NOAA take national security impacts into consideration in the critical habitat designation process. ESA Section 7(j) also provides an exemption for national security reasons but currently the Air Force has not needed to seek the 7(j) exemption for any species.